

**Attn:**-----

Madrid, XX March 2015

**Subject: Improved transparency in the PNA model application**

Dear Director:

In my capacity as Chair of the Long Distance Advisory Council (LDAC), I would like to convey the opinion of our members on the PNA model application regarding tropical tuna fisheries management in the Western Pacific Ocean and its potential extension to other areas in the Atlantic Ocean.

The LDAC is a body that provides advice on issues relating to management of fisheries resources by the European fleet fishing in distant waters. The LDAC was formally declared operational in 2007 and is made up of fisheries sector members and other stakeholders. Our mission is to provide advice to the European institutions (Commission, Council and Parliament). The LDAC mainly focuses on the external dimension of the Common Fisheries Policy of the European Union. More precisely, the LDAC issues opinions on topics relating to:

- Fisheries agreements with third countries;
- Relations with Regional Fisheries Organisations where the EU is a contracting party;
- Relations with international organisations, in the waters of which the Community fleet operates;
- Trade relations and international market of fishing products.

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With this letter we wish to inform you about our members' concern regarding potential problems arising from the displacement of non-European fleets fishing efforts from the Western Pacific Ocean towards other waters such as the Indian and the Atlantic Oceans, something that would affect tuna fisheries as a whole worldwide. Thus, attention should be drawn to the need to agree on an effective Vessel Day Scheme (VDS) based on transparency and on a level playing field.

We are aware of the fact that the European Commission is having conversations with the PNA to work along the abovementioned lines. We would like to congratulate the Commission on this initiative and we would like to know the level of progress achieved with the PNA to improve the transparency of its VDS system. The LDAC supports the Commission's work with the PNA and we kindly request you not to cease your efforts to ensure [the Commission's](#) participation in a monitoring committee in the event the desired results are not obtained. Otherwise, the catch certificates issued by countries fishing under the VDS will not be able to ensure the validity of their licenses and whether the fishing days purchased comply with the sustainability criteria required. Since the VDS implementation, the situation of bigeye tuna stocks has not improved at all in spite of the time/area closure measures for FAD fishing that have been applied by the WCPFC, since the increase in fleet capacity neutralises the potential positive effects that closures might have.

It is a fact that vessels flying an EU flag strictly comply with Community regulations in terms of preservation and sustainability of marine and fisheries resources and fighting against IUU fishing. With our experience, we consider it is extremely important that the European Union be an ally for these matters to assist on an effective and transparent application of the PNA model. Within the LDAC, we will be pleased to offer our help and collaboration to provide the stakeholders' perspective as representative body of the Community fleet present in international waters, RFOs and with fishing interests and investments in third countries.

I remain at your disposal should you have any queries.

Yours sincerely,

Antonio Cabral, LDAC Chair