



EUROPEAN COMMISSION
 DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director General

Brussels,
 DG (2011)

Dear Ms de Lucas,

I would like to thank you for the LDRAC document on the *Commission Communication on the External Dimension of the Common Fisheries Policy*. I note with satisfaction that LDRAC welcomes this Communication and shares many of the considerations and actions put forward by the Commission. Let me react to some of the points made.

Contribution to the Global Sustainability

I concur with you that the global presence of the EU fleet and EU investors should be given special acknowledgement. As pointed out by LDRAC the fight against IUU fishing, cooperation with key partners, including coastal States and capacity management are key elements of the EU's external fisheries action. In line with LDRAC recommendations, the EU is putting forward proposals on a Unique Vessel Identifier in RFMOs, and there have been recent decisions in that direction in ICCAT and CCAMLR for example.

With regard to the fees for access to fishing on the high seas outlined in the External Communication, they would be intended to contribute to the strengthening of the financial base of RFMOs, including their monitoring, control and surveillance capabilities to deter non-compliance and IUU fishing. At the same time the particular circumstances of each RFMO (i.e. membership, fleet segments, main fishing grounds) require access fees to be considered on a case by case basis.

I am pleased to see you support the Commission's initiative for organisation of an international conference on the issue of capacity to ensure that this problem is discussed and appropriately tackled while bearing in mind the needs of the developing States. As you point out, the system of capacity management of RFMOs needs to be developed and agreed at international level, however it should reflect the principles enshrined in the EU's Common Fisheries Policy.

Policy coherence is one of the pillars of the External Communication and it implies coherence of EU fisheries policies in internal and external waters as well as

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complementarity between EU fisheries policies towards third countries and other EU policies linked to or being impacted by fisheries (development, trade, environment, research and health).

Sustainable Fishing Agreements

I am pleased that LDRAC's supports the SFAs legal framework regarding the regulation of the EU fleet activities in the third countries and that it supports the Commission's proposals on the separation of the access costs and the sectoral support. Indeed, to improve financial management we need to decouple sectoral support payment from fisheries access rights payments and will define sectoral support in the light of the needs and absorptions capacity of the partner countries. With this decoupling, shortcomings in the delivery of sectoral support should be avoided. Sectoral support will be more effective and focus on scientific capacity, data collection, surveillance and monitoring and fisheries management measures.

Regarding the issues of the increase of ship-owners' contribution to the access costs I share your opinion that this is a crucial element of the SFAs. The Commission is convinced that a balanced solution has to be found.

Furthermore, I take good note of LDRAC proposal on stakeholders' participation in the negotiation process for SFA and its interest in working conditions on board of EU vessels. Finally, on the issue of extending the network of the Agreements, it would be appropriate to first find a common understanding on the external dimension of the CFP before such initiative would be launched.

Yours sincerely,



Lowri EVANS