

Utrecht, June 10, 2008

To: NSRAC Secretariat,

A number of non-fishing sector interest groups (e-NGOs and recreational anglers, hereafter referred to as 'we') met recently to discuss the functioning of the RACs. We accept the RACs as a constructive forum to move fisheries policy forward. In this spirit, we are committed, wherever possible, to seek consensus with other stakeholders in the interests of yielding robust RAC advice for the Commission and the wider EU institutional framework.

A particular issue, however, where we have genuine concerns is the TAC advice proposals from the RAC. There are several reasons for this:

- On the strictly quantitative issue of TACs, the views of the sector and ourselves are routinely so far apart as to be irreconcilable, with no consensus possible.
- We feel that the annual discussions on TACs and the timing of the advice take up too much valuable time in RAC meetings. We consider that this time should be devoted more usefully to strategic actions, notably the design and implementation of long term management strategies, and the discussion and planning for piloting practical schemes deemed capable of improving fishing practices (such as improving selectivity, discard reduction schemes, spatial planning systems, rights based management etc). We would prefer to spend relatively more time on such strategic issues as being more likely (a) to improve fisheries management within the region covered by the RAC and (b) to reach a consensus viewpoint; this, in turn, will generate advice of greater value to the Commission. The same cannot be said of the RACs' recurring advice on TACs, the large percentage of which carry NGO minority positions.
- We believe that RACs should be working to have all stocks operating under well designed, long term management plans, as agreed by the revised CFP regulation. We have seen that where effective plans are agreed, TACs are generated according to the plans, minimising the need for negotiating and freeing up more time to discuss other management measures.
- The NGOs and recreational anglers often simply do not have sufficient capacity to make an informed judgment on RAC alternatives to the ICES advice.
- Parties who would like to table issues in the RAC, such as research initiatives, hardly get an opportunity to do so because of the overloaded RAC meeting agendas.

With these considerations in mind, we would like to have the *option of abstaining from a position* on issues, in particular on TACs, where we have not been able to reach an informed opinion which coincides with the majority of the RAC. The abstention should be duly noted in the RAC's advice to the Commission and any other fora.

The same challenge has already arisen, and been dealt with, in ACFA with the approval of all stakeholders, so there is an important precedent for resolving the situation.

We request that this proposal be tabled at the next Executive Committee with a view to its adoption. We submit the proposal as a constructive contribution to facilitating debate and the decision-making process in the RACs.

Yours sincerely

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Vice-chair NSRAC  
On behalf of the e-NGOs and European Anglers Alliance