

## The North Sea Regional Advisory Council

NSRAC Secretariat  
Woodhill House  
Westburn Road  
Aberdeen AB16 5GB  
Scotland



**NSRAC**

Commissioner Borg  
European Commission  
B-1049  
Brussels

2 February 2006

Dear Commissioner Borg

The NSRAC Directors convened on 11 January 2006 in Aberdeen. From this meeting we would like to convey to you our concerns on two issues: the recent press release regarding the long term management of flatfish in the North Sea and the lack of front loading in the yearly decision making process.

The NSRAC was aware of the fact that the Commission was preparing a proposal for a long term management plan for flatfish in the North Sea based on the MSY approach. Also the NSRAC was aware of the fact that the Commission's approach regrettably was different from the approach of the NSRAC's advice on flatfish management in the North Sea (issued in July 2005). The board of directors of the NSRAC however is disappointed with the Commission's press release of 10 January 2006 which stated that the Commission's proposal was developed after consulting the NSRAC. Although this is correct, to some people who read the release it suggested, or at least implied, that the NSRAC was in agreement with the content of the Commission's proposal.

The NSRAC stated in its flatfish advice of July 2005 that it wished to open a general discussion on high yield (MSY based) long term fisheries management, based on a paper produced by the European Commission, before applying such approaches to the flatfish and other North Sea demersal fisheries. The NSRAC pointed out that it is essential that these long-term approaches should be developed in close conjunction with stakeholders and scientists. Indeed, the NSRAC has started a focus group on this subject in August last year in which some eminent scientists are participating.

The RACs consider front-loading to be of vital importance to the success of the RACs in providing strong, scientifically based advice. However, over the past two years 2004–2005, front loading has on the whole remained an aspiration rather than a reality. In concrete terms this has meant that the Commission has not been able to provide adequate advanced information on its

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proposals to the RACs, or discussed the key elements in such a way that the RACs could provide considered comment.

If RACs are to deliver their full potential ways must be found for the Commission to explain the thinking behind its proposals in detail. This did not happen last year and we therefore hope that strenuous efforts will be made in this year to allow the RACs a genuine role in the pre decision-making stages of policy.

Please find attached our Flatfish Working Group report for your information.

Yours sincerely



Hugo Andersson  
Chair North Sea Regional Advisory Council

cc Miriam Garcia-Ferrer  
Jorgen Holmquist