

Mr. Karmenu Vella
Commissioner for Environment, Maritime Affairs and Fisheries
European Commission

Copy:
Mr. João Aguiar Machado
Director General for Maritime Affairs and Fisheries
European Commission

Brussels, 2 November 2017

Subject: Meeting request – Revision of the fisheries Control Regulation

Dear Commissioner Vella,

Since 2010, the European Union (EU) has been a leader at the international level on the fight against Illegal, Unreported and Unregulated (IUU) fishing, notably through the implementation of the EU IUU Regulation.¹ Through this piece of legislation and related commendable initiatives taken under your leadership, third countries wishing to export fish into the EU must certify that it was caught in accordance with all applicable laws and regulations. To ensure a level-playing field between third countries and EU operators, it is however of utmost importance that this anti-IUU policy is matched with a strong internal fisheries control policy. The EU fisheries Control Regulation which entered into force in 2010,² sets the rules applicable to the monitoring and control of EU vessels, notably within EU waters.

Under your supervision, the EU has strengthened its role as a driving force of strong anti-IUU policies and improved the accountability and transparency of its own fishing fleet in non-EU waters. The success of the anti-IUU fishing policy as well as of the Regulation on the sustainable management of the external fishing fleet and of the Common Fisheries Policy rely to a large extent on the full implementation of the Control Regulation. Furthermore, the European Commission is also driving the implementation of technical management rules for EU vessels to comply with, and the Control Regulation will be fundamental to ensure that these rules are applied.

¹ Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing.

² Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy.

Birdlife Europe, CAPE-CFFA, ClientEarth, the Environmental Justice Foundation, Greenpeace, Oceana, the Pew Charitable Trusts, Seas At Risk and WWF would like to highlight their serious concerns regarding the proposed fast-track revision process of the Control Regulation. According to the Inception Impact Assessment of the revision of the Fisheries Control System published earlier this month,³ a standard open, public consultation will not be conducted before the publication of the Commission proposal. It will instead be replaced by “targeted consultations” which will take place during the last quarter of 2017, in clear contradiction with the European Commission’s own Better Regulation Guidelines.⁴

The Control Regulation is an important and wide-ranging piece of legislation. We therefore believe that any revision of this text should be conducted without unnecessary haste and should allow all stakeholders to express their opinions within a reasonable timeframe. The Commission has an obligation to respond to such submissions when drafting its proposal. We therefore call on you to follow due process under the Better Regulation initiative.

We would like to therefore kindly request a meeting with you to further discuss the revision of the Control Regulation and its role in protecting the marine environment. To arrange the details of the meeting, your services can contact Elisabeth Druel (edrue@clientearth.org).

Yours sincerely,



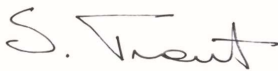
Ariel Brunner
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Birdlife Europe and Central Asia



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Catherine Weller
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Senior Officer
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Monica Verbeek
Executive Director
Seas At Risk



Dr. Andrea Kohl
Director (acting)
WWF European Policy Office

³ Available [here](#).

⁴ Commission Staff Working Document SWD (2017) 350, Better Regulation Guidelines, Chapter VII.