



The Director-General

Brussels,
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Mr Dr. Yordan Gospodinov
Secretary General of BISAC
Black Sea Advisory Council
Ohrid Street n° 16
Varna
BULGARIA

Subject: Recommendation on IUU fishing

Dear Mr. Gospodinov,

I would like to thank the Black Sea Advisory Council for the detailed advice delivered on issues related to the control of fisheries.

Concerning your recommendation relating to the first sale of fishery products, we agree with them and consider that they are in line with the provisions of Articles 56 and 59 of Regulation (EC) No 1224/2009 on fisheries controls¹.

We agree that proper implementation of the rules on traceability is key in the fight against illegal, unreported and unregulated fishing and to protect the rights of consumers to know the origin of the fishery products. In its proposal on the revision of the EU fisheries control system the Commission has reinforced the provision on traceability and included the mandatory use of electronic tools and the reference to the unique fishing trip identification number.

Concerning the use of designated ports, we agree that the decision to use designated ports allows a better control of the landing of fisheries products. We recall that as part of the management measures adopted by the GFCM for turbot in Black Sea, landings of turbot may only take place in designated ports.

¹ 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, amending Regulations (EC) No 847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006 (OJ L 343, 22.12.2009, p. 1).

Concerning the catch reporting by small-scale fisheries, we welcome your proposal concerning the use of mobile phones and online based solutions for the catch reporting by small-scale fisheries. In its proposal on the revision of the EU fisheries control system², the Commission has included the digital reporting for catches for all vessels below 12m. Tools such as web-based application or mobile phone applications would be adequate. These tools can be developed today without waiting for the new control regulation to be adopted and implemented.

Finally, let me remind that imports of fishery products from third countries, including landings by third country vessels into EU ports designated for that purpose, are covered by requirements of the EU IUU Regulation (1005/2008).

If you have any questions on this reply, you may contact Ms. Pascale Colson, coordinator of the Advisory Councils (pascale.colson@ec.europa.eu, +32 2 29 56273).

Yours sincerely,



Bernhard FRIESS
Acting Director-General

² Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control (COM/2018/368 final)