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Mr. Frans Timmermans
First Vice-President of the European Commission
European Commission

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

Brussels, 20 December 2017

Subject: Meeting request – Revision of the EU Fisheries Control System

Dear First Vice-President,

Birdlife Europe, CAPE-CFFA, ClientEarth, the Environmental Justice Foundation, the Fisheries Secretariat, Greenpeace, Oceana, Our Fish and WWF would like to highlight their serious concerns regarding the rushed revision process of the fisheries Control Regulation and the decision not to conduct an open public consultation before the publication of the legislative proposal in early 2018. Contrary to the original plan of the European Commission¹ and according to the Inception Impact Assessment of the revision of the Fisheries Control System published in October 2017,² the standard open, public consultation will 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.³

The fisheries Control Regulation⁴ sets the rules applicable to the monitoring and control of European Union (EU) fishing vessels, making it the cornerstone of the EU fisheries control system. The proper implementation of this important piece of legislation has wide-ranging implications for EU fishers, consumers and the marine environment.

The short timeframe within which the targeted consultations currently carried out are taking place will not allow the Commission to seek stakeholders’ views on all key impact assessment issues, such as amendments now under consideration to the regulation to prevent, deter and eliminate illegal,

¹ Available [here](#).

² Available [here](#).

³ Commission Staff Working Document SWD (2017) 350, Better Regulation Guidelines, Chapter VII.

⁴ 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.

Unreported and Unregulated (IUU) fishing. Neither will the Commission be able to collect and analyse all relevant evidence, as required in the ordinary Impact Assessment procedure. In addition, our organisations will be unable to fulfil our role in enabling public participation and dialogue during the consultation and subsequent decision-making process, which in turn undermines civic rights and democratic principles of the EU.

It is of utmost importance that the revision of the fisheries Control Regulation is conducted without unnecessary haste, allowing all stakeholders to express their opinions on all elements of the impact assessment. We also kindly remind you that the Commission has an obligation to respond to such submissions when drafting its proposal.

We would like to offer our support to the European Commission in ensuring the proper feedback in the revision of this important piece of legislation. For this, we kindly call on you, as First Vice-President responsible for the better regulation agenda within the European Commission, to follow due process under the Better Regulation initiative and conduct an open and public consultation. We further kindly request a meeting with you to further discuss the revision of the Control Regulation. To arrange the details of the meeting, your services can contact Elisabeth Druel (edrue@clientearth.org).

Yours sincerely,



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Birdlife Europe and Central Asia



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CFFA Coordinator



Catherine Weller
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Steve Trent
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Jan Isakson
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The Fisheries Secretariat



Saskia Richartz
Deputy Director
Greenpeace European Unit



Lasse Gustavsson
Executive Director
Oceana in Europe



Rebecca Hubbard
Programme Director
Our Fish



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