Executive Director
CFCA - Community Fisheries Control Agency
Apartado de Correos 771
E-36200 Vigo
Spain

1 July 2011

Dear Mr/Ms….

As you will recall, the North Sea Regional Advisory Council has previously expressed concern over the introduction of the new OMEGA net gauge. In our letter of 15 December 2009 to the European Commission we set out our reservations in some detail.

When the OMEGA was introduced, netting which had proved satisfactory when measured with a wedge gauge consistently failed measurements made with the OMEGA meter. Fishers have been faced with the prospect of having to invest substantial sums in acquiring new nets, or the payment of large fines, at a time when they can ill afford to do so.

The industry therefore commissioned an independent scientific agency, TNO in the Netherlands (http://www.tno.nl/), to investigate the workings of the OMEGA (Objective Mesh Size Gauge) when measuring mesh sizes. You will find the report with the results of this research attached.

The most important conclusions of this research are as follows:

1. The OMEGA works properly and is fit for the purpose of measuring mesh size
2. It is difficult to measure mesh size reliably and reproducibly. This is an inherent problem because of the material nets are made of.
3. Mesh size shows a large variation (standard deviation) when measured.
4. This variation leads to a high probability of unjust rejection of a net.
5. A higher pre-tension when measuring the net, for example 300N as opposed to the current 125N will increase the reliability and reproducibility of the measurements.
6. Repeated measurements on the same mesh will, alternatively, also increase the reliability and reproducibility of the measurements.

TNO concludes:

“To achieve a more reproducible and reliable result with the OMEGA, two recommendations are made:

1. increase the pretension of the mesh size gauge,
2. measure each mesh at least three times and judge a mesh size on the last reading of these consecutive readings.”

Based on this expert advice from an international agency of high standing, the NSRAC proposes a workable solution to the problems being caused by the difficulty in measuring

mesh sizes reliably by the OMEGA gauge. The NSRAC proposes that the CFCA accepts the advice of TNO and adheres in future to the following protocol:

1. Increase the pre-tension at which mesh sizes are measured to at least 300N.
2. Measure each mesh 3 times and use the last measurement to calculate the average of the 20 meshes measured.
3. The results from point 2 above should then be judged as follows:
    a. The average value of the mesh size should be at least 1 mm above or below the legally required mesh size. This allows accounting for the 1mm accuracy of the OMEGA.
    b. Average values that are between 1-3mm below the legally required mesh size should lead to cutting of the net.
    c. Average values that are 3mm below the legally required mesh size, lead to reprimands.

Because of the importance of this matter we are copying this letter to the Commissioner, Commission Services and North Sea Member States.

It has been agreed by the NSRAC that a small industry group from the RAC will seek a meeting with the CFCA and the Commission to discuss the protocols being applied, and this group will subsequently report back to the NSRAC. We hope you are willing to discuss the matter with us and look forward to your invitation.

Yours Sincerely,

Niels Wichmann