

Mr Fabrizio Donatella  
Director - Fisheries Policy Atlantic, North Sea, Baltic and outermost regions  
DG MARE, European Commission  
Rue Joseph II 99  
1049 Brussels  
Belgium

Zoetermeer, 20 May 2022

**Subject: NSAC Letter to Commission on Technical regulation in the Norwegian EEZ**

Dear Director Mr Donatella,

The North Sea Advisory Council (NSAC) members resolved to write to you after having recently learned of the new set of technical regulations implemented unilaterally by Norway as of 1<sup>st</sup> January 2022, stipulating the ban on the use of beam trawlers by March 2022. While the ban on beam trawling has since been postponed to June 1<sup>st</sup>, this decision presents a major issue for the beam trawl fleets that have traditionally carried out their fishery in the Norwegian zone, as well as, through displacement, for many other fisheries in the North Sea.

Among other things, the new Norwegian rules are comprised of the setting of a new unified Minimum Conservation Reference Size (MCRS) for a number of species which has until now been set separately for the North Sea and the Skagerrak region. The possibility of Norwegian authorities reserving certain areas for particular types of fishing gear have also raised concerns.

To our dismay, these substantial changes in conditions for the performance of fishery seem to have been taken forward without any, let alone timely, consultation with the parties affected by these provisions. The representatives of the fishing industry have not been invited to discuss the contents of the new legislation and have not been notified in due course that the new regulation is set to step into force. The general impression is that the same approach, severely lacking in transparency, has been applied to the European Commission. The NSAC finds this to be a major breach of formal and pragmatic cooperation between two friendly partners.

Executive Committee Chair: **Kenn Skau Fischer** - tel: +45 51 19 95 37, email: ksf@dkfisk.dk  
Secretariat: **Tamara Talevska** - tel: +31 62 53 18 192, email: tamarat@nsrac.org  
NSAC is an association registered in The Netherlands No 73959987  
Registered Office: Louis Braillelaan 80, 2719EK Zoetermeer  
NSAC Transparency Register ID: 91682404018-74

We would like to stress that, while not in any way questioning or challenging the right of the Kingdom of Norway to decide on the rules regarding the performance of the fishery in their respective economic zone, the NSAC would have expected to have been given the opportunity to contribute, in a constructive way, to the introduction of the new technical measures and to accommodate Norwegian ambitions for a strengthened protection of the environment, which we fully support.

The Advisory Council of the North Sea therefore suggest that the European Commission approaches the relevant Norwegian authorities with an invitation to meet, with the intention to engage on the ways to make such decisions taken in a transparent and inclusive way. The Council strongly believes that it should be possible to find common grounds without diminishing the ambitions of Norwegian authorities. Here, one important question could be raised, which is what the purpose of the exclusion of beam trawls is, and whether this purpose could perhaps be achieved through alternative means.

We suggest this and more to be the topic of a proposed meeting between the Commission and the Norwegian delegation. The NSAC, as always, stands ready to provide further assistance in the setting and coordination of such a meeting.

We thank you in advance for your consideration of the above and remain at your disposal for further engagement on the matter.

With best regards,



Kenn Skau Fischer  
NSAC Executive Committee Chair

