To Licence holders over 10m, registered buyers and Sellers of first sale fish and interested organisations.

**Our ref** CRL 611
5 May 2006

Dear Sir/madam,

**Electronic Recording and Reporting of Fishing Activity and on means of Remote Sensing**

In April 2005 Emma Southard sent a copy of an EU proposal on Electronic Recording and Reporting of Fishing Activities and on Means of Remote Sensing to interested organisations. We have now received a revised proposal and I attach a copy for your information and comment. You should note that this is due to be discussed at European Council in June; comments should therefore be sent to Emma Southard at the above address or by e-mail to Emma.Southard@defra.gsi.gov.uk before 31st May 2006 to enable us to take account of your views and where possible feed into the discussion.

As you will see the revised proposal contains no details of what the systems must/should do, it simply provides the obligation on Member States to use Electronic Recording Systems. There are three clear aspects to the proposal:

- electronic recording of information required in logbooks, landing declarations and transhipment declarations;
- electronic recording and submission of sales note data by those involved in the sale and purchase of first sale fish; and
- use of remote sensing of fishing vessels by Member States.

We are broadly supportive of these measures which will help to improve compliance and reduce administrative burdens on industry. Nevertheless we believe the current suggested timetable for implementation is unreasonable. We have suggested that there should be at least a 12 month period for introduction of the first phase once detailed rules are agreed and put in place. For the introduction of electronic sales notes, we have
suggested 1 January 2009. Hopefully this will be clearer once a further revised text is received.

Detailed implementation rules will be negotiated once this proposal is adopted at Council, on the basis of a proposal from the Commission. When we receive this we will write again to seek your views on the detailed arrangements.

Yours sincerely

J Fitton

Julie Fitton
Fisheries Enforcement Policy