

the proposed Action plan will be developed; (ii) present and analyse the options in a better way, for instance explain why a strict precautionary approach is not required; (iii) explain how figures on costs were obtained and further quantify 'management costs' and administrative burden.

In its meeting with the IAB, DG MARE agreed to make the necessary changes.

(1) Provide more information on the general policy context. The stand alone character of the text should be strengthened by elaborating more on the place the proposed Action plan would occupy in comparison to already existing EU policy (on discards, the reform of the CFP) and international initiatives (e.g. IUU fisheries, Johannesburg WSSD).

(2) Improve the presentation and analysis of the options. The presentation of the policy options is currently too succinct and should be further elaborated. The preferred option should be part of the presented policy options and be structured taking account of the different nature of measures (softer and stricter) which it contains. The report would gain in clarity if option B were split into sub-options and each of them assessed separately. It should clarify whether the measures are aimed at EU flagged ships or at vessels operating in the EU regions. The analysis of the options should demonstrate better which problem causes the preferred option B tries to remedy and the rejection of the strict precautionary approach of option C should be better justified.

(3) Better quantifying and justifying costs. The analysis contained in the report should be strengthened by presenting in an accessible way quantified data, information and estimates obtained on the basis of the MRAG study. This would include a justification on how the expected impacts on each option have been determined. The report should also contain a better explanation of the term 'management costs' and provide related data on estimates of costs for each option. It should also analyse further existing and expected administrative costs in particular with regard to the various reporting requirements. If administrative costs are significant the standard cost model should be used.

(D) Procedure and presentation

The monitoring and evaluation arrangements need to specify when the Commission will monitor and report on implementation of which parts of the Action plan. The defined set of indicators should be expressed in more quantified terms and linked to a clear timetable.

2) IAB scrutiny process

Reference number	2009/MARE/001
Author DG	MARE
External expertise used	No
Date of Board Meeting	24 September 2008
Date of adoption of Opinion	29 SEP. 2008