



**compliance with the rules? What is the risk of uneven implementation or creation of uneven playing fields?**

**4) To what extent does the preferred option address the problems identified and meet the objectives? To what extent can it improve the effectiveness of the technical measures?**

**Once revised, the IA must be resubmitted to the Board which will issue a new opinion on the revised draft.**

### **(C) Main recommendations for improvements**

**(1) The scope of the initiative.** While the report demonstrates there is a need to act, it should clarify the framework and scope of the initiative, clearly mentioning what has been already decided in the revised Common Fisheries Policy (CFP) Regulation and then focusing the analysis on what is to be decided now. The report should better explain the governance structure and how regionalisation would work in practice, mentioning for instance how stakeholders would be involved in the decision making process and what would be the role of the Advisory Councils.

**(2) Content of the technical measures proposed.** The report should explain concretely what would be proposed, and on the basis of which criteria, at the (a) EU level (i.e. adopted through the ordinary legislative proposal); (b) regional level; and (c) which measures would be repealed. Given the divergent views of stakeholders on the content of the framework and the likely different possible ways/measures to achieve the binding objectives stated in the CFP Regulation, the report should consider whether sub-options for the preferred option should be proposed and assessed. Moreover, it should explain, in the context of regionalisation, what incentives are foreseen to encourage compliance with the rules and ensure a level playing field. It should also specify how the effectiveness of the new framework would be monitored.

**(3) The effectiveness of the options.** The report should better explain to what extent the proposed options (and possible sub-options) would enable to deliver the objectives of the CFP and tackle the problems related to the poor effectiveness of the current technical measures. It should explain how the preferred option would avoid that the current drawbacks of the technical measures are going to be reproduced at regional level. The report should also better assess likely concrete impacts stemming from the technical measures, in particular for the catching sector and for different Member States. Furthermore, it should more clearly explain for all policy options how the main advantage of the current technical measures, i.e. ensuring a level playing field for all EU fleet, would still be ensured under the evolving new governance system. In doing so, the report could use examples and findings of the retrospective evaluation or other evidence. Moreover, it should better explain how the catching sector counteracted the effectiveness of the current conservation rules through technical innovation and to what extent the new system would avoid the same undesired consequences.

*Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.*

### **(D) Procedure and presentation**

The different sections of the report should be better linked. First, it should be made clearer which problems are going to be dealt with by the initiative, followed by a consideration of specific objectives directly linked to them. On this basis, more closely

linked objectives and options would make the assessment of each option's effectiveness more meaningful. In order to make the report more accessible for non-expert readers, a glossary explaining technical terms should be added.

<b>(E) IAB scrutiny process</b>	
Reference number	2013/MARE/002
External expertise used	No
Date of IAB meeting	17 June 2015