



**EUROPEAN COMMISSION**  
 DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES  
 THE DIRECTOR-GENERAL

Brussels,  
 D(2011)

Mr Sam Lambourn  
 North-Western Waters  
 Regional Advisory Council  
 Bord Iscaigh Mhara  
 Crofton Road  
 Dun Laoghaire  
 Co Dublin  
 IRELAND

**Subject: Communication on Fishing Opportunities**

Dear Mr Lambourn,

I am pleased to reply to the NWWRAC's position papers concerning fishing opportunities for 2012, and on setting TACs for data deficient stocks in North Western waters. This paper has been a very useful contribution to the extended consultation exercise that was held this year, and we have taken careful account of your points of view when preparing the "Fishing Opportunities" proposals for next year. I will reply to the points in the position paper in turn, but first of all I would like to stress that I appreciate very much the commitments to sustainable fishing and to reductions in TACs following scientific advice about sustainability.

**Introduction/State of Resources**

In line with the proposed reform of the Common Fisheries Policy, the Commission intends to propose long-term plans that take account of both technical interactions in mixed fisheries and of biological competition and predation among the fish stocks in the ecosystem as soon as the scientific advice to do this becomes available. ICES have promised to provide us with multispecies advice for the Baltic Sea in 2012 and the Commission intends to propose a multiannual plan for Baltic Sea cod, sprat and herring that takes account of these interactions. ICES have also promised to provide mixed-fisheries advice in 2012 for the North Sea, and this will be taken into account as soon as the management of North Sea cod and other species in the North Sea is revised. Concerning other areas including those covered by the NWWRAC, we have asked ICES to provide us with a plan that sets out the deliverables needed to implement mixed-fisheries and multispecies advice (such as adequate data sets, and basic research findings) and the timings when we can expect these to be available. If ICES identify shortfalls where the industry could assist in completing data sets or supplying relevant knowledge, we will bring this to your attention in the hope that the NWWRAC will be able to help.

The Commission's analysis of fleet capacity, undertaken in the preparation of the CFP reform process indeed fails to indicate a significant reduction in the EU fishing capacity. Of course, fishing effort in the area to the west of Scotland and in the Irish Sea shows a marked declining trend, but deployed effort in many sea areas shows a different trend to EU-wide capacity, particularly as the areas concerned are mostly subject to effort restrictions. The effort graphs were included in the Communication in order to make available the facts as clearly as possible, but I can agree that these trends could well have been mentioned in the text.

### **Policy Directions (and principles for data-deficient stocks)**

We have taken note of the strong opposition by the NWWRAC as well as other RACs to an across-the board reduction of 25% for all data-poor stocks, and have instead proposed reductions of either 15% or 25% according to the severity of the situation, and taking account of some of the factors you refer to. The situation of data-poor stocks is still deeply unsatisfactory and we have asked ICES to provide an advisory framework that will make use of the available information (even if it is limited) in order to lead to advice that is precautionary. Two ICES working groups will look into this topic next year (WKPOOR and WKFRAME), and the NWWRAC could be represented with observer status. The work of the NWWRAC to look into data-poor situations is valuable and we trust it will continue. However, it remains the case that TAC reductions in data-poor cases are in accordance with the precautionary approach: a failure to provide data should not be rewarded but should lead to a more precautionary management decision.

The Commission has not proposed any alteration to the role of STECF. While reflections are still underway about the need to improve scientific advice in supporting the reformed CFP, no conclusion has yet been reached.

The NWWRAC advises an increase in funding for data collection. We are presently working on a proposal for a new European Maritime and Fisheries Fund for the period 2014-2020 and in this context we will consider the issue of the resources available for fisheries monitoring and advice, including for data collection. However, that need may have to be balanced against other criteria, both within the fisheries sector and elsewhere and the attribution of EU Funds for instance for data collection should not just substitute national resources.

We are also looking at ways to improve the efficiency of the provision of advice through better coordination and management of scientific activities, in partnership with the providers of advice and the managers of the human resources.

### **Discards**

The collection of data on discards is a key data item in the provision of scientific advice. When focussing on data improvements, measures to improve the quantification of discards will naturally play an important role. We will of course be counting on the industry to collaborate in this exercise and I am pleased to see that you share our view on this issue.

Yours sincerely,

  
Lowri EVANS