



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

Brussels,  
MARE C2/ Ares (2012)

Bertie Armstrong  
NWWRAC Chairman  
c/o Bord lascaigh Mhara  
Crofton Road  
Dun Laoghaire  
Dublin  
Ireland

Dear Mr Armstrong,

Thank you for your letter of December 2011 setting out your proposals in respect of nephrops Stocks in Area VII. As you are aware when the NWWRAC submitted this information the Commission had already made its proposal to the Council, and the final decision was a matter for the Council. However, the issues raised by the NWWRAC were discussed further during the Council meeting in December and you will be aware of the outcome. I hereby would like to provide you with some additional clarifications.

In your proposals you identified information from the Irish Marine Institute that is more current than that available to ICES when preparing their advice. The inclusion of additional information at such a late stage is often difficult as it cannot be fully peer reviewed. You will be aware that while a roll over in TAC was accepted, the sub-TAC for the Porcupine bank and closed period remain in place. ICES will be able to fully consider the additional information and incorporate it into their advice for 2013.

The issue of management on the basis of area or functional unit for Area VII nephrops needs to be revisited; you highlight that you are content for stock assessment to be carried out on a functional unit basis but wish to retain flexibility to move between these areas and oppose the imposition of TAC's on a functional unit basis. However, you highlight that the Spanish fleet has access only to the Porcupine Bank, therefore the opportunities open to that fleet must reflect the reality of the fishing opportunities on those grounds. Clearly unless there is a mechanism to reduce effort within a functional unit the potential for overexploitation remains.

As regards your point regarding the under utilisation of quota by certain Member States it is useful to note that mechanisms exist for Member States to transfer or exchange such quotas.

Finally, I would like to thank you for your request for STECF to carry out an evaluation of both the management options and the time period of application and the effectiveness of the seasonal closure in FU16. We agree that this is relevant and consider that this should be included as part of the annual appraisal of this stock unit and will pass this request onto STECF.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lowri Evans', written in a cursive style.

Lowri EVANS