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DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

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Mr. Marc Ghiglia  
North-Western Waters Regional  
Advisory Council, Bord Iascaigh  
Mhara, Dún Laoghaire, Co. Dublin,  
Ireland

**Subject: Response to the Communication from the European Commission concerning Fishing Opportunities for 2013 - COM (2012) 278 final**

Dear Mr. Ghiglia

I thank the NWWRAC for your response to our Communication. I will structure my reply according to the headings in your response.

### **1. Introduction**

Following the successful development by ICES of its MSY framework for the provision of catch advice in fisheries and our adoption of that framework in making proposals for fishing opportunities, I note your view that a necessary next step would be the extension of this approach to cover multispecies interactions. I agree, and we have already asked ICES to work on this. In our view, the implementation of multispecies management should take place through the adoption of multiannual plans covering several species in the same area and accounting for their interactions. We have attended a dialogue meeting with ICES on this topic (WKTRADE) and we understand that work is moving ahead to develop the biological basis for such plans. In the near term, stock assessments and the derived biological reference points will be recalculated using new estimates of natural mortality that includes predation mortality by commercial species. Further developments will be forthcoming when specific regional multispecies or mixed fisheries plans are proposed and established. In this respect, I refer of course to the work of the RAC towards the development of a management plan for the Celtic Sea. As you know, our services would be ready to support this work, in particular with regard to the necessary bioeconomic modelling. We are finalising a call for tenders to fund the necessary study. We place high priority on this project.

I also agree that selectivity improvements can make a big contribution to reduction of discards, but we also consider that reducing fishing mortality rates will also contribute substantially to discard reduction by improving the ratio of larger to smaller fish in the sea.

## **2. State of fish stocks**

The Communication provides an overview of the evolution of the state of fish stocks managed under the CFP. While regional differences and notable events are referred to in the text, we are reticent on providing very detailed tables of stock performance broken down into regional areas. Such tables would be harder to understand, would duplicate information in ICES advice, and would refer to such small numbers of stocks in each region that wider trends might be missed.

I welcome your view that improvements have been made to gear selectivity in the West of Scotland, Irish Sea and Celtic Sea, and would note the input of the NWWRAC in respect of the latter, which the Commission took up in Regulation 737/2012, adopted last August. Such improvements are certainly very necessary and very desirable.

There remain big conservation challenges in these areas. For example, the latest (revised) ICES advice concerning stocks of gadoids to the west of Scotland indicates a need for a threefold reduction in TAC for haddock, that catches of whiting should be reduced to the lowest possible level, and that there should be no directed fishing for cod (with bycatches and discards being minimised).

## **3. Economic analysis**

At the moment only elementary economic analyses can be carried out of the consequences of in-year TAC advice because the economic data reported under the Data Collection Framework lag two years behind. Figures such as the €135m were calculated by DG MARE on the basis of the increase in first-sale value of the TACs for species fished corresponding to  $F_{msy}$ , assuming unchanged prices from recent observed values. We are looking at ways to improve the usability of economic analyses in forward projections in order to make them more pertinent.

## **4. Policy decisions**

A precautionary approach to fisheries management decisions is still necessary and it is a requirement to be more careful where uncertainty is greater. We have advice from ICES on the extent of the additional caution that needs to be implemented, and we surely have to take this into account. I can agree, of course, that it would be far preferable to dispose of accurate and reliable statistics in order to reduce the dependence that management has to make on such precautionary margins.

Concerning Nephrops and Channel plaice, the Commission has after careful consideration deferred work on a possible re-arrangement of the management areas to next year.

## **5. Management by Multiannual Plans**

I share your wish that a solution be found to the institutional disagreement that is hindering the adoption of further long-term plans. The Commission continues to inform

and to facilitate discussions, and hopes that the Council and the Parliament will finally be able to reach agreement on this topic.

## **6. Working method on proposed TAC**

The Commission's proposal for fishing opportunities provides for adaptations in TACs in the direction recommended by the ICES advice for data-limited stocks. Specifically, the Commission is proposing to change TACs by the same proportion as the ICES advice concerning changes in actual catches. This applies both to increases and to decreases, in order to maintain some stability in the fishing opportunities, to provide a buffering against large cuts but equally against large increases. Also, this approach takes account of the fact that recent fishing practices do, in a number of cases, differ from those implicit in relative stability keys and that some national quotas are likely to remain unfished. While the new data-limited form of advice is still subject to further developments, we feel this is an appropriate approach at this stage.

In conclusion, I would like to thank the North-Western RAC for the positive comments you have made in connection with our Communication. It must be a source of satisfaction that substantial and widespread improvements in the state of fish stocks are taking place, and I expect that your industry will soon begin reaping the benefits of phasing out overfishing.

Yours sincerely,



Lowri EVANS