



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels,
A2/OB-EG D(2013)

North Western Waters RAC

Bertie Armstrong (Chair of the Exec. Committee)
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Subject: Three proposals on management measures on demersal stocks in areas VI and VII in 2013

Reference: Email from Alexandre Rodríguez dated 14 December 2012

Dear Mr Armstrong,

Thank you for the NWWRAC proposals on management measures on demersal stocks in Areas VI and VII in 2013 that we received just prior to the December Fisheries Council. You are certainly aware of the outcome of the discussions, but the Commission would like to seize this occasion to further develop the grounds of the decisions taken.

You will find below our response, especially the follow-up that the Commission intends to give to the points raised. For sake of clarity, we will respond separately to each proposal.

Declaration on cod and mixed demersal fisheries in the West of Scotland (VIa)

The Commission would like to thank the NWWRAC for the declaration on management measures for the West Scotland Demersal fisheries. We welcome the intention to develop an operational plan and explore the possibility of establishing fully documented fisheries (FDF), provided that they guarantee the required protection for Area VIa Cod.

Concerning the current conservation measures in the West of Scotland, we would like to point out that the Cod recovery plan aims at reducing fishing mortality by allowing the introduction of selective fishing practices. In this respect, several measures were found to be ineffective by the Scientific, Technical and Economic Committee for Fisheries (STECF). Some others have been implemented only in 2012 and have hence not yet been evaluated. Finally there are other ones which are under consideration.

TACs and fishing mortality

Before examining the possibility of an increase in cod catches, it is necessary to find a clear mechanism to control mortality. Indeed, the direct transfer of current cod discards into landings will not reduce a fishing mortality that is already considered too high. Moreover, for the cod stock, ICES suggested that the current target of F (fishing mortality of 0.4) is probably too high and a target F of 0.17 may be preferable with all that implies for the operation plan.

Data deficiencies

ICES delivered a quantitative assessment for the West of Scotland Cod in 2012 but it is true that the availability of data is still an issue. In this regard, the Commission invites the NWWRAC to further contribute to improving this assessment. In particular, a key point concerns the discards as previously identified by the NWWRAC.

Fully Documented Fisheries (FDF)

The establishment of a FDF in the Area VI for demersal fisheries requires robust assessment and data on other stocks as well. For instance, the revision of the advice on Haddock stocks last year demonstrates that assessments need to be continually scrutinised and improved to provide an adequate picture. The ICES working group WGMIXFISH is expected to further progress the provision of mixed fishery advice for the West of Scotland.

The UK has undertaken a number of trials on a catch quota system. One of the conclusions is that when there is sufficient quota for a single target species the uptakes can be better controlled (when this is coupled with more selective fishing patterns and gears). However, for multiple target species it is still unclear how this will work (especially with a landing obligation or a more restrictive TAC). Although this does not forcibly imply that an FDF as the one explored by the NWWRAC cannot deliver the target mortality required, it is vital to set out in the operational plan how this will function precisely (namely by identifying effective selective gears and spatial controls). It is imperative that in the operation of a FDF there is sufficient quota to cover the activities of all the vessels. In addition, quota allocation will not be adjusted to match consumption unless the conservation objectives for the stocks can be met.

In this respect it will in particular be important for the Member States to reassess the allocation of quotas to their respective fleets, so as to ensure that this allocation is actually compatible with the catch composition for the different fleets.

Proposal on a seasonal closure for skates and rays in the Irish Sea in 2013

The introduction of a voluntary closure aiming at increasing the protection of these species is very welcome. Indeed, at this stage it is not possible to set Total Allowable Catches (TAC) and quotas for each individual species within the skates and rays group and in addition, data available on these species is limited. Hence, the Council decided to impose an overall catch reduction to which the voluntary closure will contribute.

It is now important to identify how this can be effectively assessed. It may, in fact, turn out to be difficult for scientists to identify the scale of the beneficial impact, if any, and

therefore voluntary closures should be seen more as complementary and interim solutions. In this respect, catch limits remain for the time being the only option that maintains some control over the fisheries concerned. Any alternative solutions, including the use of binding closures and any other technical measures can be taken into consideration, provided that they are clearly proposed, assessed, and agreed. The NWWRAC is therefore strongly encouraged to further explore and develop such options.

Advice in support of the position paper of the European Association of Producers Organisations (EAPO) on Nephrops management in the Porcupine Bank (FU 16) for 2013

The additional survey work undertaken by the Marine Institute on the Porcupine Bank has provided for an amended assessment of the nephrops stocks, according to which there has been an improvement in the stock in 2012. In the light of this information, during the December Council, it was agreed to reduce the period of closure, in line with the NWWRAC's proposal (the period of closure now operates from 1 to 31 May).

By contrast, in order to ensure that the increased access to the stock will not result in over-fishing, the sub TAC has been maintained, setting an upper limit to the catches. A further amendment of the current management arrangements cannot be excluded in light of future surveys and assessments. To assist with this, a request has been tabled for the April Plenary meeting of STECF, seeking their appraisal of the benefits of the previous closures and scientific recommendations for future management conditions.

I thank you for your continued interest and constructive input. If you have any question on this reply, you can contact Mr Olivier Baudelet, coordinator of the Regional Advisory Councils (olivier.baudelet@ec.europa.eu; +32.2.295.68.70).

Yours sincerely,

Lowri Evans

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