



**European Commission J99  
Directorate General for Maritime Affairs and Fisheries  
DGMARE/A2 – Common Fisheries Policy and Aquaculture  
B-1049 Brussels**

**Subject: Request for evaluation of Proposed Closures for Skates and Rays**

Dublin, 4th of September 2013

Dear Director General Evans,

We refer to the above and previous correspondence herein, in particular your letter of the 8<sup>th</sup> of March in response to the NWWRAC proposal regarding a seasonal voluntary closure for Skates and Rays in the Irish Sea submitted in December 2012.

It is noted that while you state the introduction of the voluntary closure is very welcome *“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 [...] 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”*.

Your correspondence was discussed in detail at a NWWRAC working group meeting in Bilbao in April and a number of those present expressed their disappointment with the response of the Commission. Of particular concern was the fact that the Commission appears to indicate that before they will consider any closure proposal in lieu of a quota reduction that the effectiveness of such a closure would have to be demonstrated. It was agreed between several fishing industry representatives present that this would be a considerable disincentive to this type of proposals being put forward in the future.

This issue has been discussed with relevant scientific experts who would appear to be of the view that a system could be implemented which would allow the effectiveness of such closures as previously proposed be assessed prior to the closure being put in place.

From an Industry perspective the members of the NWWRAC are most anxious to continue their work in relation to propose such voluntary closures.

The NWWRAC is requesting that a system be put in place which would allow ICES and STECF to evaluate periodically the effectiveness of such closures with respect to their contribution towards the recovery of stocks. In particular in relation to Skates and Rays we would request that the following proposed voluntary closure be evaluated:

**IRISH SEA VOLUNTARY CLOSURE**

**Duration:** 1 April-30 June 2013

**Co- Ordinates:**

- a. 53 11.50 N ----- 5 57.00 W
- b. 53 11.50 N ----- 5 38.50 W
- c. 52 58.00 N ----- 5 38.50 W
- d. 52 48.00 N ----- 5 51.50 W
- e. 52 36.00 N ----- 5 58.50 W
- f. 52 36.00 N ----- 6 00.00 W
- g. 52 38.50 N ----- 6 00.00 W
- h. 53 11.50 N ----- 5 57.00 W

