



12th of November 2009

Subject: Survival rate and stock status of skates and rays in Area VII; and cod and plaice in area VIII

Dear Mr Fotiadis,

In the light of the Commission's response to the opinion of the North Western Waters RAC on *Rajidae*, and following the presentation of the ICES recommendations on certain Eastern Channel stocks to Working Group 3 of the RAC, the members of this RAC wish to raise awareness of the importance of improving knowledge on the status and discard survival rate of certain species.

As already stated in the opinion on skates and rays in April, the 2009 introduction of landing bans for some skates and rays requires these species to be returned to the sea even if they are by-catches. Depending on the gear used and the size of the individuals, discards might be dead or injured, so this drastic measure does not a priori produce the desired effect on stock. The RAC is thus concerned by the generalised introduction of new rules on these species in the framework of the action plan for sharks without knowing the real impact of these restrictions on stock status. The NWWRAC therefore recommends that resources be allocated to studies on survival rates, such as the British study for trawlers targeting demersal species, as well as alternative methods to limit discards of these species, such as the introduction of a minimum landing size for rays.

Furthermore, the data on elasmobranch species, both biological and historical catches, is insufficient to allow ICES to make a quantitative assessment of these stocks or to issue specific recommendations on fishing possibilities. The Commission's reply indicated that the bans reflect the opinion of ICES. However, the latter advocates the introduction of measures to reduce the pressure on local abundance rather than a total ban on landings. The RAC only advocates that special attention be paid to the data collected on these species in order to reduce uncertainty and improve recommendations.

The RAC is also concerned by discards of commercial-sized cod due to the high abundance of cod in the Eastern Channel (also recognised by the working group of ICES¹) and the low TACs. The survival rate of this cod should be measured and the possibility of landing such specimens by adjusting TACs as appropriate should be studied.

¹ Report of the Working Group on the Assessment of Demersal Stocks in the North Sea and Skagerrak, 6-12 May 2009 (ICES CM 2009/ACOM:10)



Lastly, ICES expresses concern in its 2009 recommendations over the high discard rates for plaice in the Eastern Channel². Despite a benchmark meeting on flatfish held in February, a quantitative assessment of stock status cannot currently be made due to the lack of information on actual discard levels and uncertainty over stock structure. Improved stock assessments for this species are therefore essential for setting TACs in line with fishing mortality. In other words, this TAC must take into account the important survival rates of discards suggested by past marking studies.

The North Western Waters RAC therefore invites the Commission to add to the studies on the survival rates of discards of certain species and to take into account these results in seeking out alternatives to landing bans and improving knowledge of stock status in order to establish fairer fishing possibilities.

I am looking forward to hearing from you soon.

Yours faithfully,

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Sam Lambourn

NWWRAC Chairman

² Report of the Working Group on the Assessment of Demersal Stocks in the North Sea and Skagerrak, 6-12 May 2009 (ICES CM 2009/ACOM:10).