

North Western Waters Regional Advisory Council Working Groups Opinion on *Rajidae* (skates and rays)

April 2009

The working groups of the North Western Waters RAC met in Madrid on 17 and 18 February 2009 discussed the introduction of the regulations on skates and rays in the Regulation on TAC and quotas for 2009 [Regulation (EC) 43/2009]: introduction of the TAC, catch reporting by species and duty to release certain species. Members recognize the need to regulate catches of these species and do not oppose the principle of introducing a TAC. However, the measures adopted pose a range of issues – listed below – as to application, and the relevant regulations are to some extent hard to understand. The measures adopted have attracted much criticism, especially for the lack of scientific grounds for certain prohibitions on landings, and for the not inconsiderable socioeconomic effects on some fleets. RAC members hope to be provided with scientific rationale of the measures.

- 1- Species identification is difficult and crews do not necessarily have the training required to identify all species of skates and rays. The on-board workload is heavy, furthermore, and mistakes could be made despite the crew's intentions.
- 2- Several species of skates and rays the landing of which is banned (mandatory release) account for a significant volume of trade for many British, French, Belgian, Irish and Spanish vessel owners. The European Commission appears not to have considered this economic detriment. Undulate ray (*Raja undulata*) and blue skate (*Dipturus batis*), specifically, are species of commercial importance for many vessel owners.
- 3- The measure prohibiting landings and mandating discards appears to be grounded in survival rates thought to be high. However, fishing industry members have scant information on the extent to which survival rates are known. It would be useful to obtain information about the available data and, if necessary, to support the setting in motion of a fresh programme/study to improve such knowledge.
- 4- Specifically as regards undulate ray, some NWWRAC members were aware of ICES scientific reports on *Rajidae*. The opinion put forward with regard to this specific species seems not be alarming. NWWRAC members accordingly fail to understand the prohibition on landing proposed by the Commission and adopted by the Council. According to the ICES report, the state of this population is “*uncertain but with cause for concern*”. NWWRAC members would therefore wish to know the reasoning behind the ban.
- 5- As to blue skate, NWWRAC members wonder about the specific scientific grounds, since, according to the perceptions of fishing industry members, the population is not in an alarming state.

The NWWRAC members wonder if it would not be advisable to be informed of the specific scientific grounds of these bans, and the data underlying the scientists' and the EC's actions.



Finally, the NWWRAC wishes to underscore that neither the European Commission nor ICES had informed the NWWRAC working groups in the course of their meetings of the situation eliciting concern with regard to certain populations of skates and rays.