



25th of November 2010

Subject: Response Commission Letter from Lowri Evans on NWW RAC Opinion on Effort management in Zone VII_{fg}

Dear Ms. Evans,

I am pleased to reply to your letter on effort management in zone VII_{fg} in response to the NWW RAC opinion paper on this subject.

I regret to inform you that it was strongly stated by many members of the NWW RAC that your response of 9th of August did not satisfactorily address the issues raised.

The main concerns were:

Co-Decision Procedures

The legal status and explanation offered in your response on co-decision making was not at all the understanding of the NWW RAC. It was felt that the Commission's non-paper was attempting to describe a complete departure from the existing management regime and therefore was not simply an instance of setting "fishing opportunity". Therefore it was strongly felt that this issue has to be subject to the co-decision procedure.

State of Stocks

We are concerned about the negative interpretation and presentation of the ICES stock assessment advice as well as the apparent lack of recognition of the substantial reduction in effort through existing regulation and structural changes in Member State fleets in the area. There are positive trends in some stocks and there has been a substantial overall decrease in effort in recent years, as confirmed in our July meeting by the ICES Celtic Sea Eco-region Working Group Chair.

The NWW RAC is not suggesting any increase in effort would be desirable only to say that the trends are largely positive and a more collaborative, stakeholder-led approach is needed to secure the long-term sustainability of the stocks. The NWW RAC has already embarked upon the process of developing an ecosystem-based LTMP for mixed demersal fisheries in Zone VII_{fg}.

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Capacity Cap

The Capacity Cap described in the NWW RAC opinion paper is a mechanism to ensure that the activity of vessels not previously active in the area does not substantially increase. The response and non-paper display an apparent lack of understanding of the activities and possible response of the fleets that would be affected.

It is fair to state that effort would not be completely limited by a capacity cap but other measures such as the 'Trevoise Closure' and TAC restrictions have already effected a genuine reduction in effort. There is no evidence to suggest the trends and fishing patterns of the fleet already active in the area will change.

The real threat of increasing effort therefore comes from vessels that, faced with a lack of days in their current areas where the cod recovery plan is implemented, would come and fish in the area. This is exactly what the objective of capacity cap would be: to prevent any increase in fishing from displaced fleets currently fishing outside the area. Notwithstanding this, it must be noted that the Spanish members of the fishing industry have stated that the historical fishing rights of national fleets should be maintained when determining the effort ceiling allocated in the area (regardless the effective consumption or utilisation of their quotas), in order to not alter the relative stability in the area.

The Way Forward

The NWW RAC is committed and prepared to develop a fit-for-purpose Long Term Management Plan (LTMP) but that has to be within an achievable timeframe that allows full and proper development process. The NWW RAC has set up a focus group to begin the process of defining clear and agreed objectives. Only from that starting point can we develop such an LTMP.

However if this is to be successfully achieved, the Commission will need to listen to what the stakeholders are saying and be open to discussion rather than try to impose what the industry considers to be an ill-conceived interim plan. The result of ignoring this advice will be to alienate the stakeholders and bring into question the sincerity and credibility of the Commission's commitment to work with the NWW RAC.

Yours sincerely

Sam Lambourn
NWWRAC Chairman

Attached: Meeting report of the Celtic Sea Fisheries Focus group meeting (Madrid, 8 Sept 2010)