

# PRAC Discard Plan Document Structure

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1. Introduction: biology, stock size and distribution, management, recent catch data
2. Fisheries data: area, gear, mesh size, vessel type & number, season, tonnes caught (by country)
3. Existing discard data
4. Discard measures in place (official and industry initiatives)
5. Problems & solutions
6. New requirements of the CFP, implementation of discard measures, incentives
7. Implementation & Control & enforcement
8. Conclusions & recommendations



# Articles 15 and 16 of the CFP

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- Severe shortcomings in the formulation of these articles
- Open to different interpretations
- Interpretation of de minimis exemption can have an essential impact on the potential effect of the exemption
- No metrics defined regarding the application of the de minimis
- No definition of “disproportionate costs”
- Implementation of 9% inter-species flexibility can have significant impacts depending on how this is applied
- Application additional TAC under article 16
- “High survival” is a highly subjective term
- Lack of scientific evidence due to lack of standardized experiments

