



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels,

Mr. Sam Lambourn
NWWRAC
Board Iscaigh Mhara
Crofton Road
Dun Laoghaire
Co. Dublin
Ireland

Subject: Effort Management in Zone VII_{fg}

Dear Mr Lambourn,

I am pleased to reply to the NWWRAC's opinion concerning effort management in zone VII_{fg}, following from the Commission's non-paper.

Co-decision procedure

The setting of permissible effort management, like the setting of TACs, is an instance of setting "fishing opportunity". Such decisions can be taken by the Council on the basis of a proposal from the Commission and do not require the ordinary legislative procedure (co-decision).

State of stocks

The issues you note have already been considered by ICES and STECF. For convenience I will summarise verbatim the headline advice for 2011 for each of the stocks in question according to the transitional MSY approach with caution at low stock size:

- Celtic Sea cod: "Catch and effort reduction"
- Celtic Sea haddock: "Effort should not be allowed to increase, reduce discard rates"
- Celtic Sea whiting: "Effort should not be allowed to increase, reduce discard rates"
- Celtic Sea plaice: "Less than 390t". This catch corresponds to a 35% reduction in fishing mortality.
- Celtic Sea sole: "Less than 1400t". This catch corresponds to a 63% increase in fishing mortality".
- Celtic Sea Nephrops: "Reduce landings from recent level". STECF adds that recent catch and effort data are not reliable.
- Megrim VII : "Catch and effort reduction"
- Anglerfish VII and VIII: "Catches should be consistent with no increase in effort "

- Hake VI, VII and VIII: STECF advice is "Less than 63 300t". The ICES advice appears to include a mistake. However, both ICES and STECF agree that the state of the stock is unknown.

I conclude that there is no basis in the scientific advice for an increase in fishing effort for any of these stocks, with the exception of Celtic Sea sole. That exception merits further examination.

You mention that an effort is needed to improve data provision in this area. I agree. The main problem with the data is the absence of reliable catch and landing data. Provision of such data is in the hands of the catching sector and Member States. In the absence of such information a simple and precautionary approach - and a very minimalistic one - is simply to avoid effort increasing. That is the purpose of the Commission's approach here.

Science-Industry Partnerships

I welcome the establishment of the initiatives you mention. I have been made aware of similar initiatives in the past which regrettably did not result in sufficient improvement in data collection to resolve the problems with the assessments that we see today. I hope the new initiatives will be more successful. Pending a demonstration of their outcomes it remains appropriate not to increase fishing effort or fishing mortality.

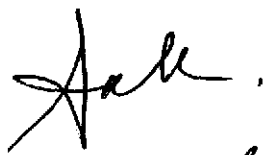
Days-at-Sea Regime

I am not proposing an extension of the days-at-sea scheme from the cod recovery programme to the Celtic Sea. My approach is a simple effort ceiling commensurate with the state of the activities at this time. This does not prejudge further work towards a comprehensive area-based management system, if the RAC would be ready to develop possible measures to this end.

Capacity Gap

The measure you propose would limit the capacity of vessels having access to Zone VII_{fg}. It would not limit the fishing effort nor the fishing mortality that such vessels could deploy by fishing more time in this zone. In fact, the measure would not prevent redeployment of more effort into Zone VII_{fg} by vessels that currently spend only a small part of the year fishing in this area. As such, this measure would be less effective than an effort limitation. I am open to looking into this further, but I would have to be convinced that the capacity of vessels fishing in VII_{fg} is already close to being fully utilised in this area, otherwise the measure would risk being largely ineffective.

Yours sincerely,


for Lowri EVANS 