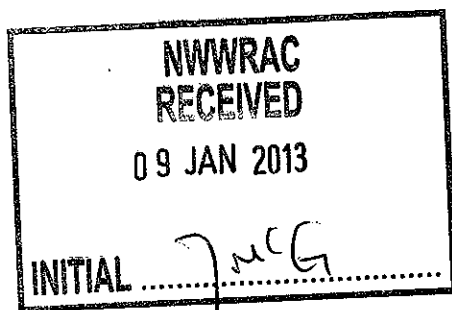




EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels, 13 DEC. 2012  
MARE-A2/OB D(2012)1486407



North Western Waters RAC  
Mr Bertie Armstrong (Chair of the  
Exec. Committee)

BIM, PO Box 12  
Crofton Road,  
Dun Laoghaire  
IRL - Dublin

**Subject:** Advice from the North Western Waters RAC on an audit of Irish Sea Cod Assessments and Management measures and on a Fully Documented Fishery for the West of Scotland Demersal Fisheries

*Yr reference:* Letter from B. Armstrong dated 18 October

Dear Mr Armstrong,

Thank you for the North Western Waters RAC advice on an audit of Irish Sea Cod Assessments and Management measures and on a Fully Documented Fishery for the West of Scotland Demersal Fisheries. You will find below the response to your advice, especially the follow-up that the Commission intends to give to the points raised. For sake of clarity, we will follow the structure of your advice.

Audit of Irish Sea Cod Assessments and Management measures

- *ICES*

The Irish Sea Cod stock was benchmarked in 2012 and ICES intends to undertake a further benchmark in 2014. ICES benchmarks ensure that in assessing a particular stock, scientists have taken all the relevant information available into account and are applying the most appropriate model which reflects the best scientific knowledge available. The benchmarking was indeed unable to satisfactorily resolve the issue of unaccounted mortality for this stock. The stock continues to be below safe biological limits and recovery signs are limited (cod is not the only whitefish stock that is severely depleted in this region).

Whilst we can ask ICES to scope and include any additional data that is now available there is no certainty that this will resolve the unaccounted mortality. It will take time to

reconstruct discard data or to compile sufficient time series for inclusion and ICES already consider the assessment as a work in progress. The NWWRAC may be able to contribute to these issues. This could be further explored for example in the meeting between ICES and RACs on 17-18 January in Copenhagen.

Following your request we have included an item in respect of an audit of Irish Sea Cod within the Memorandum of Understanding with ICES. This will be discussed in more detail in December with ICES.

- *Recovery measures*

It is clear that previous recovery measures have not been as successful as expected. All whitefish stocks in the Irish Sea are in a poor state and there is a history of high discarding rates and low TACs. In particular, discarding from the TR2 fleet must be addressed and improved selectivity is required for all species.

Regardless of the effort regime, selectivity improvements and avoidance measures are required by the industry to reduce discards. Indeed, while discard rates remain high and stocks biomass low any recovery will be impaired.

You will be aware of the Commission's intention to introduce future long term plans on a mixed fishery or multi-species basis. For the Irish Sea, STECF have already identified that considerable work is required to develop a mixed fishery plan, let alone a multi-species one. However, any improvement of management of cod should not be held up by this process. In addition, a review of closed areas has been undertaken previously by STECF, in addition to its yearly evaluation of measures under the Cod Plan.

Whilst work is ongoing on a future long-term plan that will certainly not be proposed before 2015, the industry and regional managers need to consider what selectivity and avoidance measures can be introduced urgently to provide the protection needed to all stocks of whitefish in the Irish Sea.

The United Kingdom, as a major stakeholder, has committed itself in December 2011 to impose selectivity for cod fisheries in the Irish Sea. Gear trials have been carried out in 2012 but have unfortunately not been conclusive and need to be continued. I invite all stakeholders, and especially the RAC, to support and advance this process.

#### Fully Documented Fishery (FDF) for the West of Scotland Demersal Fisheries

In your letter, you consider the establishment of a reference fleet as a move to a FDF in the West of Scotland. As you note the use of reference fleets is currently being examined by the European Fisheries Control Agency and its conclusions will be taken in consideration when examining any specific application of a FDF system to the West of Scotland.

In establishing a reference fleet there will be a number of risks that need to be assessed but this can be considered and hopefully addressed (in this regard, it would be useful if you could provide a couple of risk examples). The key concern is probably whether the reference fleet is truly representative and whether this activity represents the normal one for the vessel types. Another concern is the way it can be implemented given the current state and priorities for the stocks impacted. It is inevitable that for fisheries in the West of Scotland cod be the most impacted species. The current protection given to this stock to

ensure its recovery would severely limit any application of a FDF unless catching and discarding of cod can be avoided.

In your proposal you suggest that a revision of cod TACs with an inclusion of current discard levels (as a reflection of the actual catch) might facilitate the operation of a FDF and directly remove the discarding issue. This approach will however not reduce mortality of the stock. While we are open to any helpful initiative, it is essential that the target mortality can be achieved through changed fishing practices. Unless this is the case any FDF will need to be very restrictive.

The long term aim of the cod plan and hence the effort regime is to control the mortality of the cod stock and to encourage fishing that does not impair it. Previous measures introduced under the cod plan for the West of Scotland have not been successful. Current levels of mortality remain too high. The additional measures put into practice this year have not yet been evaluated and it is not clear whether spatial separation has the intended impact on catches and mortality. When the impact of the current measures will be assessed, it will further contribute to the discussion on a FDF.

In any case, given the extremely high levels of cod discarding recorded in the West of Scotland fisheries, in addition to cod avoidance measures, it would be imperative, in any future scenario and in addition to any FDF catch quota system, that the fleets introduce highly selective gears, similar at least to those used in the North Sea. This is especially needed in the TR2 gear group.

I thank you for your continued interest and constructive input. If you have any question on this reply, you can contact Olivier Baudelet, coordinator of the Regional Advisory Councils ([olivier.baudelet@ec.europa.eu](mailto:olivier.baudelet@ec.europa.eu); +32.2.295.68.70) or directly my colleagues in Directorate C, Bernhard Friess or Fuensanta Candela, who are also in dialogue with Marine Scotland on these issues.

Yours sincerely,



Lowri Evans

Copies: F. Candela Castillo, R. Griffin, L. Markovic, O. Baudelet (DG Maritime Affairs and Fisheries)