

JOINT ADVISORY COMMITTEE

Agreement between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the French Republic concerning Fishing in the Bay of Granville.

COMITÉ CONSULTATIF MIXTE

Accord relatif à la pêche dans la baie de Granville entre la République Française et le Royaume Uni de Grande Bretagne et d'Irlande du Nord

to Sam LAMBOURN Chairman of the North West Waters Regional Advisory Council

Dear Sir

PROPOSED COUNCIL REGULATION CONCERNING THE CONSERVATION OF FISHERIES RESOURCES THROUGH TECHNICAL MEASURES

The Joint Advisory Committee Bay of Granville established under the above Agreement is tasked with ensuring the conservation and effective management of the fishery resources in the area covered by the Agreement (an area of both French and Jersey territorial waters situated in the Channel). The Committee meets three times each year and at its most recent meeting held in Jersey on 17th September discussed amongst other topics the draft proposal for a Council Regulation concerning the conservation of fisheries resources through technical measures.

The Committee did not have sufficient time to make a comprehensive study of the draft and in particular did not fully examine the proposals relating to the use of towed nets; however the following areas of concern were highlighted:

Detailed Comments

Article 3 The fishermen we represent are concerned at the reduction in the number of species subject to minimum sizes and would wish to see the existing minimum sizes retained and a re-introduction of the minimum sizes previously dropped from the regulations. It would not be sufficient to reintroduce those minimum sizes at a regional level as this could lead to instability in the marketing of fish and shellfish.

Of particular concern is the omission of minimum sizes for shellfish species including lobsters; minimum sizes for such species are a proven management measure and particularly important as their capture does not depend to any significant degree on gear selectivity.

Annex I *Maja squinado* should read *Maja brachydactyla*.

Annex II(3) In previous regulations the size of a spider crab has been measured as the length of the carapace. If width is now to be used, then if the same effective size is to be retained the minimum size at Annex 1 will need to be appropriately adjusted. There would not appear to be any good reason for changing the way in which a spider crab is measured.

- Article 4 There is no longer a reference to the need to retain lobsters, crayfish, bivalve and gastropod molluscs whole; this was an important safeguard in allowing effective enforcement of minimum sizes, particularly of scallops and of spider crab being retained as bait.
- Article 8(2) It is understood that a tangle net being used to catch spider crabs falls within the description of nets that would have a proposed maximum soak time of 48 hours. Tangle netting for spider crabs is an important aspect of the local fishery and in some circumstances tangle nets need to be set for longer than 48 hours. There may however be some merit in setting a maximum soak time provided that it does not impact on sensible fishing practices.
- Article 10(1) It is assumed that this measure is intended to apply to mobile gear but the word "haul" is not defined and hence this measure could be interpreted as relating to dredging, static netting and potting activity. This needs clarification. Whilst the impact on the use of towed nets has not been considered, the imposition of such a requirement in relation to static nets, pots and dredges would be unacceptable.
- Article 12 Whilst Regulation 850/98 prohibited the sale of fish caught with spearguns (projectiles) the draft regulation appears to totally prohibit the use of spearguns for catching fish. Spear fishing is a popular form of recreational fishing and this new restriction will prove unpopular in some circles.

We would be most grateful if you could take the views expressed in this letter in to consideration when preparing a response to the Commission on behalf of the North West Waters Regional Advisory Council.

Yours faithfully



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