



Dublin, 18 October 2012

**Subject: Request for an *Audit* of Irish Sea Cod Assessments and Management Measures**

Dear Director General Evans,

As you are very well aware, the Irish Sea cod stocks present a major problem in terms of stock assessment, fisheries policy and management measures.

By contrast with the North Sea (where a steady increase in the biomass and reduction in fishing mortality are reflected in ICES advice) or the West of Scotland (where a high level of discards have been identified as the main impediment to recovery), ICES and STECF have to date been unable to identify or weight the causal factors behind the truncated age structure that is the apparent reason for the Irish Sea cod stock's failure to recover after more than a decade of remedial measures.

The present management measures which include effort control, TACs set at very low or by-catch levels and a seasonal spawning area closure have proved to be ineffective and indeed they have not contributed to improve the knowledge of these stocks leading to the application of the precautionary approach. The NWWRAC considers that a determined effort must now be made to identify and weight the *unaccounted mortality* which afflicts both the assessment and recovery of the Irish Sea cod stocks. We fear that unless the source of the unidentified mortality can be identified, we will face another decade of ineffectual measures which undoubtedly cause pain for the industry but bring little relief in terms of recovering cod stocks that are reflected in the assessment.

This type of fundamental review (which was first requested during the Cod Symposium organised by the NWWRAC and NSRAC in 2006) requires resources and direction. We therefore request that the Commission makes it a priority to include an audit of Irish Sea cod under its *Memorandum of Understanding* (MoU) with ICES. The Commission may also think it appropriate to request that STECF also investigates aspects of this issue.

The range of possible factors involved in a truncated age structure is quite large, although some may be dismissed as not relevant or minor at an early stage in the investigation.

They include, inter alia:

- Misreported catch
- The contribution of targeted catches
- Discards
- Seals and other forms of predation
- The robustness of the assessment model
- Data deficiencies of various kinds



- Perverse effects of existing management measures
- Out migration
- Limitations in survey data/methodology
- Spatial distribution - including cod's location in the water column
- Recreational fisheries
- By-catches
- Ecosystem changes

We would hope that in undertaking this kind of fundamental analysis, the review would arrive at balanced judgements on the efficacy of longstanding measures such as the seasonal closure in the East Irish Sea and the selectivity measures (both longstanding and recently adopted such as the *Seltra* trawl).

Against the background of more than a decade of apparently failed measures we are sure that you will appreciate that a period of intense scrutiny could save much time, and wasted resources (not to mention the possibility of misdirected restrictions on the fishing industry). We are hopeful therefore that you will support our request for a full and hopefully decisive audit that would put both the assessment and management measures for the Irish Sea on a more solid footing.

Yours sincerely,

Bertie Armstrong  
NWWRAC Chairman