

North Western Waters Regional Advisory Council Opinion on Eastern Channel cod

April 2009

The members of the NWWRAC underline the lack of prior consensus as to the measures adopted in the TAC and Quotas Regulation regarding cod in the eastern area of the Channel. The separation of TACs for the Irish Sea and the Channel this year has prompted the Commission to extend to the eastern zone of the Channel, without prior consultation with professionals, the application of the measures for the North Sea arising from the accords entered into between the EU and Norway: quarterly quota management, support for real-time closed seasons, implementation of technical measures in aid of quarterly management, etc.

The members greatly regret that the Commission in no way reached agreement neither with the concerned professionals in the Channel and the North Sea nor with the NWWRAC as to negotiation of the accords with Norway. However, the Council's decisions adopted in late 2008 as regards cod in the eastern zone of the Channel relate directly to these accords. The extension of the scope of application to the Channel had not been previously discussed with the parties concerned, although the Commission did consult the parties and, specifically, the RACs with regard to the proposed measures for the TAC and Quotas Regulation.

No heed appears to have been paid to the need for consistency and interdependence between the cod plan and the TAC and Quotas Regulation. All Danish trawlers and purse seine vessels, although benefiting from an exemption from application of the fishing effort regime under the cod plan, appear to be bound by the quarterly cod quota management requirements imposed in the eastern sector of the Channel and in the North Sea. But this state of affairs bears no relation to the real world. The new rules under the cod plan will force a ship catching a very small quantity of cod to use cod-selective nets, possibly the "eliminator trawl", if quarterly targets are exceeded, even where such measure has no effect on the species.

The NWWRAC therefore respectfully asks the Commission to examine this issue and release ships benefiting from exemptions or dispensations from compliance with quarterly cod quota management requirements.