

Opinion on Management of Sole in Division VIIe

5th of November 2009

Preamble

This paper is submitted to the Commission as an aid to the deliberations on the subject of management and opportunities in 2010 for Sole in ICES Division VIIe.

The NWWRAC makes the following observations in relation to the “STECF response to a request from the Commission on fishing opportunities for 2010 for sole in ICES division VIIe”.

1. Although STECF has been unable to provide advice to the Commission on this stock in the way required by and envisaged in the management plan Council Regulation (EC) No. 509/2007, the NWWRAC is pleased to note that STECF has now provided some further guidance on the appropriate level of TAC and associated effort limits necessary to achieve the objectives of long-term sustainable exploitation and management.
2. In particular and in response to the Commission request to advise on the most appropriate TAC in 2010 likely to be consistent with achieving the target $F = 0.27$, STECF noted that F in recent years has been about $F = 0.32$. Furthermore STECF recently stated “...to achieve a target fishing mortality rate of $F = 0.27$ in 2010, would imply a reduction in fishing mortality of about 15% over recent average levels.”
3. The NWWRAC remembers that, based on the ICES WG 2008 management forecast table, fishing at $F_{0.33}$ in 2009 would have yielded 760t. (*UK DEFRA: “Rolling over the 2008 TAC (765t) into 2009 would result in a 21% reduction in fishing mortality in 2009 (from 0.42 in 2008 to 0.33); this is consistent with the level of fishing mortality that was originally intended for the years 2008 – 2010, within the ICES WG simulations used to evaluate the original plan.”*)
4. The NWWRAC also notes that, according to ICES 2008 advice, $F = 0.27$ would be reached by end of 2009 at the rate of Fishing Mortality reductions implied by the terms of Council Regulation (EC) No. 509/2007.
5. The NWWRAC believes that, through cautious interpretation and full implementation of the recovery plan, rapid progress has been made towards the achievement of the target fishing mortality in this stock, with consequent and unnecessary social and economic disruption in fishing communities. The NWWRAC reminds the Commission that no assessment has yet been made of decommissioning in 2007 of more than 20% of the SW UK beam trawl fleet.

6. The NWWRAC notes the words of caution in the latest STECF advice note: "...STECF proposes that managers adopt a pragmatic approach to reduce fishing mortality towards the target rate of $F = 0.27$ through stepwise annual reductions in fishing effort until the target is reached. " "...a more stepwise reduction of fishing days is likely to allow the fleet to adjust to the new regime over time."
7. The NWWRAC remembers the Commission statement that "fishing pressure must be reduced but this should be done gradually in order to help preserve jobs." The NWWRAC is concerned as always that any measures adopted by Council to achieve management objectives should be implemented in such a way as to minimise social and economic damage and disruption in areas categorised as fisheries dependent.
8. Given that the TAC level for 2009 was set unnecessarily low at 15% reduction compared to 2008, the NWWRAC urges that, with the effective suspension of the Council Regulation (EC) No. 509/2007, the Commission now adopts the pragmatic approach STECF suggests and sets TAC and effort levels in 2010 at the status quo compared to 2009.