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**North Western Waters Regional Advisory Council  
South Western Waters Regional Advisory Council**

**JOINT OPINION**

**Response to European Commission Consultation  
On a Long-term Management Plan for Northern Hake Stock**

**13<sup>th</sup> of June 2008**

**Conclusions and Recommendations from the  
NWWRAC – SWWRAC Focus Group on Northern Hake management  
(Madrid, 22 May 2008)**

**Presentation of the preliminary ICES advice**

The Chair of ICES Working Group on Hake, Monkfish and Megrim, presented the general trend of northern hake stock during the last years. The following were some of the main points and conclusions:

- Stock spawning biomass is increasing and has surpassed the Bpa (140 000t) for three consecutive years (2005, 2006 and 2007)
- The fishing mortality has decreased since 1995 and it is around Fpa.
- The evaluation includes landings data only for some fleets and a first estimation (still not reliable) of discards.

**General discussion on the NON PAPER**

The representative from the European Commission reminded that the Council has agreed to vote on a proposal for a long term management plan on northern hake in 2009. He added that the EU and main fishing Member States (Ireland, Great Britain, France, Spain...) had yet committed themselves to reach the MSY for its main stocks in 2015. He also noted that the entry into force of the Lisbon Treaty in 2009 may delay all the current texts coming from the European Commission.

He also took this opportunity to require the help of the fishing industry in the data collection work and cooperation from the Member States to comply with the provisions of the Data Collection Regulation in order to improve the quality of advice and ensure an updated evaluation of the stocks for all species.

All RAC participants expressed disappointment of the lack of accuracy of the NON PAPER and the restrictive nature of the management measures thereby suggested. They noted many misunderstandings and lack of technical knowledge. For example, section 3.1 related to identification of the sectors but some fleets and métiers have been omitted. In addition impacts such as discarding rates of individual métiers have not been appropriately analyzed. The participants re-emphasized the multi-specific dimension of the fishery and requested that management be consequently adapted to the specificities of the different fishing segments, patterns or fisheries. The participants regret that the NON PAPER is leaving very little place for the economic and social aspects and asked for a more balanced view.

- The table estimating the economic costs of reducing fishing mortality to MSY (Fmax) presented in point 6.2. of the NON PAPER was criticized and the participants regretted that an economist was not present to discuss the proposed figures.
- The market policy aspects (control of illegal importations from third countries, traceability about origin of products, responsible fishing or minimum prices for first sale...) are not properly dealt with in the NON PAPER. These are issues that would damage the position of the European fishing industry on the European market.
- Some participants rejected the biased version described in point 6.3. on analysis of social impacts insofar as it has many inaccurate statements which go beyond the socioeconomic report from STCEF in which these conclusions were based and affects the image of the fishing sector. The participants stressed the number of jobs created through fishing and the complexity of the social thread and activities of the fishing industry.

In summary, this document should be completely reviewed by the Commission in order to give an appropriate picture of the existing current situation of the stock (which is recovering and shows a solid and stable trend through the historical data). If the diagnosis is not precise, the implementing measures as a result of it will be neither suitable nor effective from a socioeconomic point of view.

## **Answers on the options proposed in the NON PAPER**

### 5.1. Management of fishing mortality by TAC and effort

#### *5.1.1. Which fishing opportunities should be adjusted: TACs, fishing effort or both?*

The participants, despite not agreeing with the necessity to increase the current adjustment rate, do not oppose a fishing effort reduction. Although this should be considered and developed in light of the current circumstances of structural changes within the fishing industry and not in a general manner, to achieve a modification of the exploitation pattern of the fishery. However they oppose the proposed limitation on KW/days and its potential implications for TAC and quota allocations. If adjustments need to be carried out using TACs, the real effect will be partial, as it will only affect quotas that, in the last years, have been fully taken up (30% in area VII). Indeed, a reduction on the TAC might lead to an increase of discards in certain areas. Finally, it was noted at the meeting there is already a western waters effort scheme in place

#### *5.1.2. How can fishing effort be reduced: reduction of kw/days at sea, decommissioning vessels or both?*

The participants from the fishing sector believe that the fishing effort is going to be reduced through decommissioning of vessels within each national scheme.

### 5.2. Technical measures

#### *5.2.1. Should the mesh size for the hake gillnet fishery be increased from 100mm to 120mm?*

The majority of participants from the fishing sector (with the exception of the Irish fishing industry representatives, which are opposed to any reduction from 120 mm to 100 mm as referred to in previous meetings) does not agree on the proposed increase and would rather consider the possibility of proposing the harmonization of mesh sizes to 100mm for all the hake gillnet fishery. The NWWRAC are currently awaiting a response from the Commission on an assessment by STECF on the impact of such a mesh change to the stock. The representatives from the NWWRAC members will wait to the outcomes of the work of STECF before adopting a final position on this issue.

#### *5.2.2. Should the mesh size of the Nephrops fishery be increased?*

The members support the French initiative to increase selectivity for nephrops trawlers (through the use of square mesh panels) and refuse an increase in the mesh size. Further trials on square mesh panels should be supported

#### *5.2.3. Should the mesh size of the demersal fishery less than 100mm be increased?*

The fishing industry members think that the mesh size of the demersal fishery should not be increased to improve selectivity for hake. They note that there are enough measures for protecting juveniles such as for instance the specific mesh sizes for gillnets (120 mm) and trawlers (100 mm) in the Biologically Sensitive Area in South and East Ireland

#### 5.2.4. Can an (several) area(s) be closed to fishing to protect hake juvenile?

The participants from the fishing sector refuse new proposed closed areas. They argue that many are already in place and some others are planned within the frame of the Natura 2000 network. Representatives from Ireland, Scotland and Spain stated there was merit in exploring closed areas but not in the Scottish format of Real Time Closures. The Spanish delegation show its distrust towards the concept of real-time closures, specially within a multispecific fishery

The representative from the eNGO generally supports the improvement of TCMs (leaving the fishing industry members to determine the adequate mesh sizes), and the closed areas proposal as suitable for conservation of the hake stocks.

### **Main recommendations**

The participants from the fishing sector worry that the proposed management plan will exacerbate the current measures taken within the frame of the former recovery plan. They consider that this is in contradiction with the current decrease of the mortality (F), the increase of the stock spawning biomass (SSB) and the huge increase in fuel prices.

They are aware of the objective of reaching the MSY within 2015, but in order to achieve it they would suggest to the Commission the following recommendations:

- The existing management measures (TAC and TCM) should be considered as they have proven to be successful as the ceiling of constraints before moving towards any additional and more stringent measures;
- The MSY should be reached “naturally” following the fleets’ dynamic of decreasing economic profitability mainly due to the increase of fuel prices and rising of exploitation costs. This situation will lead many vessels to move out from the fishery and participate in decommissioning schemes;
- The control measures currently in force have rendered positive results thus it is not deemed necessary to amend or modify them, with the exception of:
  - o A better control of discards (some participants mention the possibility of scientific surveys with observers on board or auto-sampling projects)
  - o Better traceability of landings;
  - o An elimination of the necessity of giving prior notice once the electronic logbook has entered into force.
  - o The future obligation of electronic log-book should both improve the quality of data and facilitate a better control of the fishing activity on sea;
  - o Removing the requirement of landing at designated ports as it only imposes more difficulties and costs for the fleet.
  - o The need of a “level playing field” for the elaboration, enforcement and application of control measures.
  - o Nevertheless, all the participants ask to increase the current margin of tolerance from 8% to fall in line with other species not subject to recovery plans. Given the fact that this measures has been proven to be one that is neither easy to implement or enforce and is not effective from a conservation point of view.