



EUROPEAN COMMISSION
 DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels,
 Ares (2010)

Mr Hugo Andersson
 Noth Sea RAC
 Aberdeenshire Council
 Woodhill House
 Westburn Road
 Aberdeen, AB16 5GB
 Great Britain

Subject: Fishing Opportunities for 2011

Dear Mr Andersson,

I am pleased to reply to the NSRAC's response concerning Fishing Opportunities for 2011, following from the Commission's Communication¹. I will address your concerns in the order of the paragraphs of your letter.

P. 3: Moving from single-species management to an integrated, ecosystem-based, multispecies approach is a long-term goal of the Commission. However, to be able to implement this it is necessary both to develop a robust model of fishermen's behaviour so that fisheries mixtures can be predicted. You will recall that the industry normally requests as much flexibility as possible so that fishermen can adapt their behaviour to market conditions and do not want to be straight-jacketed into a specific activity. This makes mixed fisheries hard to predict and hence hard to manage.

It is also necessary to reach acceptance on conservation strategies concerning fisheries mixtures. For example, should a mixed fishery be closed when the first quota in the mixture is exhausted (as is done in many fisheries outside the EU)? Or should fishing be allowed to continue, at the risk of discarding over-quota species (as at present)?

These are questions of wide scope that could be discussed in the context of alternative management systems, but it is clear that substantial long-term development is needed. You will recall that the Commission has been requesting mixed-fishery advice from ICES since 2002 but that the relevant experts have not yet felt able to provide advice in this context.

¹ COM/2010/0241 final

P. 4: The Commission considers that a general limit of 15% on TAC changes is too constraining and can prevent management objectives from being reached in a reasonable timescale. This follows from scientific advice on this topic.

P. 5: International commitments in the UN context are to comply with MSY by 2015. The Commission has shown considerable flexibility by interpreting this commitment in a fishing-mortality parameterisation rather than a biomass-based parameterisation. The Commission is open to alternative means to reach the 2015 target than in equal steps, such as in two adjustments rather than four, and I welcome your advice on such options. However, an open-ended flexibility cannot be countenanced if the target is to have serious meaning.

As for the setting of the targets themselves, the latest reports of ICES and STECF are very encouraging: it is clear that very much progress has been made so far this year. While MSY estimates are inevitably provisional as they are provided in a particular technological, and environmental and ecological context (as MSY can be affected by gear selectivity, ecosystem structure and climatic changes) there is scope for updating the present estimates when any of these external variables induce change in the productivity of fish stocks.

P. 6: It is not at all evident that switching to an MSY approach will require the sweeping reductions that you envisage. In many instances of the fish stock advice that we have received from ICES and STECF this year, you will have noted that there is relatively little difference between the "MSY" and "pa" approaches. Where there is a difference, it is often that the "MSY" approach requires a smaller reduction in fishing opportunities when stocks fall under a threshold biomass value. I think the evidence of the first year of implementation of this approach shows that concerns about moving to a more restrictive regime are not well founded.

The difference in opinion about the state of stocks between fishers and scientists is a long-standing grievance that has been much discussed. Clearly, scientists carrying out a survey of a stock in an objective and standardised fashion will have a different perception of stock status than will a fisherman who is using skilled, precise and efficient means to track down and target concentrations of fish. This difference in viewpoint is greatest for aggregating species such as cod, where fishers may well be able to find reasonable concentrations even though the stock is depleted.

P. 7: Lack of data remains a serious problem for many stocks. The most frequent difficulty encountered in this respect by the scientific agencies is the lack of data on catches, discards and landings. Although legal requirements exist they are often not met. I would welcome the NSRAC taking the lead in supporting compliance with existing provisions on data reporting before more ambitious programmes are initiated.

P. 8: Managing fisheries requires making a trade-off between the costs and benefits of catching fish in the next year, or leaving fish in the sea to grow, reproduce and provide more yield for the future. It is not possible to make such an analysis within a short time-frame so any economic analysis that focussed only on a short time-horizon would inevitably be misleading. For this reason, the Commission insists on the need to execute social and economic analysis in a medium-term perspective.

P. 9: Discarding can be seen as a symptom of a problem rather than an issue that can be dealt with by stand-alone measures. Excessive capacity, excessive effort, too high fishing

mortality rates, inappropriate fishing gear with poor size-selection or species-selection characteristics can all result in increased discarding, as can inappropriate behaviour by fishermen such as high-grading. Moving to lower effort, lower fishing mortality rates and increased yields through MSY policies will help reduce discards in the medium term. Other policy instruments (including the use of catch quotas) can also be considered in this context in the course of the CFP reform process and the subsequent development of new technical measures.


P. 10: The Commission is considering devolving decision-making to Member States in these cases. A commitment to management consistent with the 2015 MSY target would be expected. It would be up to the Member State concerned either to organise its own consultation process or to seek advice from the relevant RAC.

P. 11: This point of view has been noted.

P. 12: This viewpoint of the NSRAC is well-known. The Commission has asked STECF to look into an alternative procedure for these cases but the results are not yet forthcoming.

I would like to thank the NSRAC for its contribution to the debate on fishing opportunities for 2011.

Yours sincerely,


PP Lowri EVANS *about*