



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels,
D(2010)

Mr Hugo Andersson
c/o NSRAC Secretariat
Woodhill House
Westburn Road
Aberdeen AB16 5GB
United Kingdom

Subject: Evaluation of the cod recovery plan

Dear Mr Andersson,

I would like to thank the North Sea RAC for its paper entitled "Evaluation of the cod recovery plan", which we received by e-mail on 3 June.

The Commission acknowledges that the plan is not working as well as intended. ICES has evaluated the management plan as being precautionary if implemented and enforced adequately, but this is evidently not the case. For North Sea cod, fishing mortality is double the target level, and appears to be increasing again following its declining trend since 2000. The target fishing mortality of the plan includes the discard mortality, which is taken into account when fixing the human consumption TAC, but the actual catches have been far in excess of this. Reported discards account for between 30% and 50% of the recorded catch, and unaccounted removals are estimated to represent a further 40% - 100% of the recorded catch.

This is very disappointing, but I would question some of your conclusions regarding the reasons for this poor performance.

We have to take account of scientific advice that there is too much fishing effort directed at cod and there is too much discarding of cod. Both problems have to be addressed within the limit imposed by the fishing mortality target of the plan.

Clearly, too much effort continues to be directed at cod. Whilst I disagree with your conclusion that the effort regime is counterproductive, I do share your concerns regarding the complexity of implementing the regime. I also understand the frustration of having to endure successive reductions in fishing effort, but I cannot agree that effort restrictions have been the cause of discarding and hence the high levels of fishing mortality. The main weakness of the effort regime is that it restricts the effort of the mixed fishery, but does not seem to sufficiently ensure the reduction of the effort directed towards cod, which it was designed to protect.

You will recall that it is a central feature of the revised cod management plan that Member States and industry should take the lead in finding ways to avoid fishing mortality on cod. While this approach has only been in place since 2008, it is a matter of serious concern that the trend of declining cod mortality from 2002 until 2007 appears to have reversed in 2008 and is now increasing. I am minded to conclude that the industry-led cod conservation measures have been less effective than the management measures that were in place between 2002 and 2007.

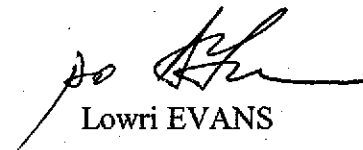
There remains a big challenge for the industry and concerned Member States to implement effective cod conservation measures within the framework of the cod plan. Apart from the need to conserve cod, a precedent is being created here. In the process of the reform of the Common Fisheries Policy it would be difficult for the Commission to support further moves towards a decentralised policy while the elements we have already decentralised to Member States cannot be shown to be working.

Concerning discard reductions, I appreciate the innovative ideas on this issue that are now being discussed in the NSRAC, particularly the support for catch quotas rather than landing quotas. A move to catch quotas would represent a fundamental change to the CFP, so this is a very useful contribution to the debate in the run up to its reform. Of course, this would require that the industry accepts a much higher level of monitoring at sea, for example by the use of CCTV cameras on board. I will be looking with great interest at the results of the trials currently underway on fully documented fisheries in this regard.

As stated in NSRAC's paper, there is a formal requirement to review the cod plan in 2011. As a start, the Commission will be taking contact with Member States concerning the apparent very high out-take of cod. The STECF have indicated that the effectiveness of a long-term plan cannot be properly evaluated until it has been implemented for about 6 years. However, recent advice is that the plan is not being properly implemented. The focus of the review will therefore be on the implementation of the cod plan by Member States. In particular, we shall have to find ways both to reduce fishing effort that catches cod and also reduce the discarding of cod.

I look forward to the collaboration and constructive contribution of the NSRAC during that process.

Yours sincerely,



Lowri EVANS