



NSRAC Comments on the Commission Communication on Fishing Opportunities for 2011

- 1 A Communication was released from the Commission on 17th May 2010 on Fishing Opportunities for 2011. The document sets out procedures for determining quota opportunities for fishers in EU waters for the coming year. The Commission has requested a response by the 1st June. However, it has not been possible for the NSRAC, which has to consult and obtain opinions from a wide range of members, to respond to such a short deadline. The NSRAC seeks a delay in order to properly take into account its comments. The NSRAC also requests that longer periods of consultation are provided for documents of this kind in future.
- 2 The NSRAC notes that the clarity of the policy document has improved this year, although there is some confusion between landings and catches throughout the text. It also notes that there have been some improvements in stocks, especially in the North Sea, Skagerrak and Kattegat.
- 3 The NSRAC is concerned that there is still such a strong emphasis in the paper on the management of individual stocks. The NSRAC has previously emphasised that future management should be based on the development and implementation of long term management plans for fisheries. Such plans would free participants in the fisheries from prescriptive regulations and from the annual setting of TACs and other management measures. A change is required from the current management approach, based on single stocks, towards a more integrated, ecosystem-based, multi-species approach. The NSRAC notes that the acknowledgement by the Commission that management plans “have proven to be more effective in managing stocks and have improved decision making”. However, many of the existing plans amount to little more than simple harvest control rules. The NSRAC would like to see progress by the Commission in establishing true long term management plans, with wider objectives and prepared with the active participation of stakeholders.
- 4 For Category 2 stocks, which are over-exploited compared to maximum sustainable yield but inside safe biological limits, the restriction on the change in TAC has now become 25% rather than the former 15%. This also applies to Category 10 stocks where STECF advises a zero catch or a reduction to the lowest possible level or similar advice. The NSRAC considers that the change from 15 to 25 % is too large.

- 5 The NSRAC has previously suggested that the aim of achieving F_{MSY} by 2015 should be achieved gradually, rather than in a sudden jump. Moreover, we have emphasised that MSY should be a range, not a single number. The report from the Commission specifies that 'for stocks for which no long-term plans have yet been proposed, it would be appropriate to move towards MSY by reducing fishing mortality in equal steps from the 2011 fishing year until the 2014 fishing year to F_{MSY} , and exploiting stocks at F_{MSY} in 2015 and thereafter. Starting in 2011, this means four equal steps'. Rather than specify that the transition should be achieved in 4 equal steps towards a specific target the NSRAC considers that it would be better to retain some flexibility. The aim should be to move in the right direction at a rate appropriate to the fishery. More generally, the NSRAC would like to see more comprehensive consideration of the huge change that the new MSY framework may have on ICES advice and TAC proposals.
- 6 There is concern by North Sea fishers over the cutting of TACs year on year for stocks which appear to be abundant. Ling, megrim and whiting appear to be quite abundant in the northern part of the North Sea and yet their TACs are being reduced. There is a large discrepancy between the scientific assessments and the perceptions of fishers for these stocks. What information can fishers provide to convince the Commission and STECF that stocks of these species are increasing? It is important to re-evaluate the scientific advice on these species. Fishers are willing to cooperate in the collection of additional data.
- 7 The NSRAC is especially concerned that in 2010 the number of stocks has considerably increased where scientists have not provided advice because of concerns about the quality of data or for other reasons. The state of 60% of stocks is said to be unknown. While it may be the case that information on these stocks is not being collected by scientists there is a wealth of information available to fishers which remains unused. Where management is impeded through lack of data then steps should be taken to remedy the omission through cooperation between scientists and fishers. The NSRAC would like to see the Commission taking the lead in mounting initiatives to improve this position with the involvement of the fishing industry and notes that the NWWRAC has previously addressed this same point in a letter to the Commission.
- 8 It is noted that in section 8 the report proposes that social and economic factors can only be addressed in the development of long-term plans, not in the context of annual advice. This requires clarification. Social and economic factors are important for all aspects of fisheries management and cannot be put aside when TACs and quotas are being proposed although we accept that the Fisheries Council must heed scientific advice when adopting proposals.
- 9 The NSRAC is concerned that there is so little emphasis in this policy paper on reducing discarding. Discards are seen by the NSRAC as being a major problem which is often made worse by the Commission's own management measures. In particular, the continuation of effort restrictions under the cod recovery plan, originally intended to reduce discards, is now causing discards.
- 10 The NSRAC notes that in the context of a more regional approach to implementing the CFP the Commission would like to consult interested parties on devolving the management of Total Allowable Catches (TACs) that concern only one Member

State to that Member State, subject to long-term commitments on reporting requirements and good management practice. The NSRAC would like greater clarification on this proposal from the Commission. It also wishes to emphasise, that any initiative to increase regional involvement in decision-making should also include stakeholders.

- 11 In the paper, it is stated: "Decisions concerning fishing effort related to deep-sea species in the Northeast Atlantic will be based on the 2009 NEAFC recommendation in this respect, which concerns the years 2010, 2011 and 2012 and states that the effort deployed shall not exceed 65% of the highest level put into deep-sea fishing in previous years for the relevant species." In fact it should say "shall not exceed 65% of the average annual fishing effort deployed by the vessels of the Member State concerned in 2003".
- 12 In relation to Category 11 stocks, where there is no STECF advice or the state of the stock is not known precisely and STECF does not advise on whether the stock is increasing or decreasing, the NSRAC does not accept that it is appropriate to reduce TACs in all instances where they have not been fully taken up. There are many reasons for TACs not being taken up – for example because of imposed effort limitations. Each case must be treated on its merits.