



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES  
THE DIRECTOR-GENERAL

Brussels, 19 OCT. 2010  
D(2010) 717027

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

**Subject: NSRAC advice on the cod recovery plan**

Dear Mr Andersson,

Thank you for your letter of 5 October concerning the cod recovery plan, and in particular my previous response to the comments of the North Sea RAC on the plan.


The apparent increase in fishing mortality in 2009 that was indicated in the latest assessment is a serious cause for concern. I am aware that some uncertainty was expressed regarding this year's assessment, partly due to discrepancies between different scientific models. We intend to ask ICES to double check the assessment and the reasons for these discrepancies. However, we must not prejudge the result, nor expect that any new advice will remove all uncertainty. Whatever the outcome, we must not use the uncertainty as an excuse for inaction. The scientific advice remains the best picture of the state of the cod stock that we have, and it would be irresponsible to use the uncertainties to justify a less than adequate response.

With regard to your comments on the fishing effort regime, I can only reiterate the Commission's view that the fishing effort directed on cod remains too high. I do not agree with your claim that the Commission's approach on effort management is "faith based" rather than "science based". Indeed, there is quite good correlation between fishing effort and fishing mortality on this stock, as was presented at the seminar on the scientific advice in September. Nevertheless, I recognise that the effort regime is a blunt instrument, and does not guarantee a reduction in the effort that is specifically directed towards cod. That is why the Commission welcomes the initiatives of the industry to reduce fishing mortality and discards by other means, contrary to your impression that we are critical of such measures. However, we must recognise that the measures were apparently not yet sufficient to prevent an increase in fishing mortality during the period when they were expected to have had most impact, and we must therefore seek to understand the reasons for this. This should not be interpreted as scepticism about what can potentially be achieved by such measures.

From our exchanges of view I am persuaded that we are in broad agreement on many issues, but that there are sometimes misunderstandings that need to be clarified. I share your view that the Commission and the NSRAC should work together to resolve these issues, not only with regard to the review of the cod recovery plan next year but also in the context of the CFP reform, and especially our ambitions for a more decentralised policy.

I look forward to our continued collaboration with the NSRAC, though I know that you will yourself be stepping down as its chairman. I would like to take this opportunity to thank you for your constructive co-operation over the last 6 years, which my colleagues speak very highly of, and wish you every success in your future activities.

Yours sincerely,



Lowri Evans