



**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: Comments of the North Sea RAC on discards of whiting and other species where there may be a mismatch between scientific assessments and fish abundance**

Dear Mr Andersson,

I am writing to you in response to the above mentioned North Sea RAC advice of 6 August 2010. Please accept my apologies for the delay in replying.

The focus of your paper is on the discards of whiting that result from a mismatch between the spatial distribution of the stock and the availability of quotas. However, the paper also touches on some other quite distinct issues, such as the merits of a catch quota system to reduce discards, and the greater involvement of fishermen's knowledge in the assessment process.

Your paper provides a good overview of issues such as the merits of a catch quota system and the various selectivity measures that have been trialled, though does not give a definitive RAC position on most of them. I would like to comment on the following points:

The first is the suggestion that the TAC area for whiting in the North Sea could be split, with separate allocation keys between the new areas. This would not be an easy exercise, but one which should certainly not be rejected. I suggest that we should wait for the response to the joint EU-Norway request to ICES on elements for a long term management plan for whiting in the North Sea before considering whether or not this would be a sensible option.

The reason for suggesting the split in the whiting TAC area is that fishermen operating in the western North Sea have to discard fish that they find locally plentiful because they have insufficient quota to land them, while elsewhere catches are lower. The second comment I would like to make concerns the coherence of this observation with the results of the North Sea Fishers' Survey presented in the paper, which seem to show increasing trends in abundance in all areas of the North Sea. The paper does not discuss the reasons for this, but it might partly explain the mismatch in perceptions between scientists and

fishermen regarding the state of the stock as a whole. I would suggest that this merits further analysis if the survey is to be used to contribute to the scientific assessments in the future. It may be, for example, that the participants in the survey are not a representative cross section of the quota holders in some areas.

Finally, the paper correctly states that many of the ICES assessments are poor because of poor catch data. However, it also states that there is a lack of will to resolve this problem on the part of the Commission. I strongly disagree with this. I think there are two separate issues to be considered. One is that we need to improve the recording of catches and discards, which are essential for reliable assessments. I would certainly ask for the cooperation of fishermen to do this. The second issue is the way in which fishermen's knowledge can be used to improve the assessments. We have already made much progress in opening the meetings of ICES and the STECF to the industry in order to find ways of pursuing this objective. I hope that the continuing dialogue between fishermen and scientists will lead to information being gathered by fishermen in a way that can be put to good use by the scientists. Now that a time series is being established it is becoming clear that the North Sea Fisher's survey shows great promise for the assessment of North Sea cod. I hope that it could also be of use for the assessment of other species, such as whiting. I believe that such surveys would be a very cost effective way of increasing the information available to scientists, possibly with some modifications to improve their performance for certain species. As they start to prove their worth I am sure that they will attract greater numbers of participants, and hence further improve their reliability which would be in the interest of both the scientists and fishermen.

I would like to thank the NSRAC for this contribution, and express my appreciation for its consistently constructive and cooperative approach.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lowri Evans', with a stylized, cursive script.

Lowri Evans