

# The North Sea Regional Advisory Council

NSRAC Secretariat  
Woodhill House  
Westburn Road  
Aberdeen AB16 5GB  
Scotland



## NSRAC

Date

Ms Lowri Evans  
Director General - DG Mare  
European Commission  
B-1049 Brussels  
Belgium

Dear Director General,

Last year you were kind enough to reply to our position paper on whiting discards. A number of points were raised by your reply and the NSRAC prepared an immediate response. For various reasons that letter does not appear to have reached you. We are therefore writing to you again, having discussed the subject further within the NSRAC, to emphasise the importance of resolving the problem of whiting discards.

First, the points you raised in your original reply.

You commented that splitting the whiting TAC, with separate allocation keys between the new areas, would not be an easy exercise. We agree. This suggestion originally came from ICES scientists, and we are aware that it would raise a number of difficulties. However, as it is one of the options put forward by scientists it may need to be evaluated further as part of a long term management plan for whiting.

You mention the results of the North Sea Fishers' Survey. These do show increasing whiting abundance in most parts of the North Sea but the trend is strongest in the western part. We think these observations are coherent and that attention should be paid to them. You will be aware that a recent comparison by ICES of Fishers' Survey results with the scientific assessments showed a high degree of agreement. Scientists are already convinced that the Fishers' Surveys can play a valuable role in validating their own results, which themselves can be limited and subject to major uncertainties. In the case of whiting, research vessel surveys show different trends in different parts of the North Sea and ICES advice is that the scientific assessment is uncertain. In these circumstances the strong trends that are evident from the Fishers' Survey should not be dismissed lightly.

Overall, we think you will agree that the quality of the scientific assessments for North Sea stocks has progressively deteriorated in recent years: to the point where ICES is no longer able to prepare full analytical assessments of important species like the whiting. Back in November, a small difference in the interpretation of the ICES advice could have led to either an increase or a decrease in the TAC for 2011, underlining the uncertainty

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attached to that advice. In the event the TAC was increased but it could so easily have been decreased, resulting in large numbers of discards.

Poor science is not simply a matter of lack of data on catches and landings, as you may be suggesting. Scientists themselves recognise that there are deficiencies in the models they have been applying to the mixed fisheries of the North Sea.

We draw your attention to the statement made by Carl O'Brien at a conference in 2010 in Ostend organised by the Belgian Presidency. Dr O'Brien is Vice-Chair of ACOM, the group of international scientists which has the final say on ICES advice. "Our models are data hungry", said Dr O'Brien. "But the provision of data is not improving; in fact it's getting worse. The future does not lie in obtaining more and more complicated data, to feed more and more complicated models. That implies a level of precision that we do not have and it suggests that our traditional age-structured models are becoming less useful for management."

"Instead we are investigating whether ICES could move to simpler models which require less complicated data and are capable of using data generated by the industry – for example through fisheries science partnerships."

We also draw your attention to the statement during 2010 by Fisheries Ministers from the UK, Norway and Denmark calling for fundamental changes to fisheries management. Their joint Declaration, presented to the Commissioner in October, emphasised that Member States should take all possible steps to account for and manage catches by their fishing fleets - without the discarding of dead fish back in to the sea. Their statement also opined that new models needed to be developed for regionalised fisheries management, rather than a one-size-fits-all approach.

We urge the Commission to take heed of these views. Action must be taken to bring scientists and fishers closer together to develop new approaches to fisheries science. It is not sufficient for Commission Damanaki to repeat the mantra that "decisions in fisheries must be based on sound science". In the case of many species, like the whiting, the scientific assessments are uncertain. Scientists have their own doubts about the validity of the current stock assessments and recognise that assessment models which make greater use of industry knowledge and data could mark a huge breakthrough in breaking down barriers between scientists and fishers. At present industry data is frequently patronised as "interesting but anecdotal." You take that attitude yourself in questioning whether the fishers taking part in the Fishers' Survey for whiting are properly representative.

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Many hundreds of science partnership projects have been completed around the North Sea. Such partnerships are now the rule rather than the exception. These partnerships are laying the foundations for a future decentralised CFP, where management of the fisheries involves advice from both fishers and scientists, and where both are working together to meet common aims.

The NSRAC developed from the North Sea Commission Fisheries Partnership, which brought scientists and fishers together from around the North Sea. Indeed that Partnership encouraged and initiated many of the fisheries science partnerships that are now achieving so much. One of the flaws in moving to the RACs, however, was the notable lack of provision by the Commission for participation by scientists. The Commission has been unwilling to provide resources to the RACs to enable scientists to attend RAC meetings and support the RACs with scientific advice. This is a complaint voiced not only by the NSRAC but also by the NWWRAC and the Pelagic RACs.

The NSRAC and the NWWRAC have now joined forces and have discussed data deficiencies with ICES. We are now planning a joint meeting with ICES at the end of March to discuss the establishment of regional data task forces. As a first step we aim to identify those critical stocks where improvements in data collection are most needed. It is regrettable that the Commission is not supporting this initiative; we would like you to take part.

We agree with your view that continuing dialogue between fishers and scientists will lead to information being gathered by fishers in a way that can be put to good use by scientists. That dialogue will undoubtedly improve the quality of the science. The solution to promoting that dialogue lies within your hands. By giving RACs the resources to enable them to invite scientists to working group meetings to provide advice and share ideas you and the Commission can make a major contribution towards improving both science and management.

Returning now to the subject of whiting discards. The current ICES assessments point out that the localized distribution of the whiting population in the North Sea results in substantial differences in the quota uptake rate and emphasise that this is likely to result in local discarding problems. Further reductions in the TAC for whiting will only increase the level of discarding. That this is so is borne out by fishers' own observations and by fishers concerns about the high level of discarding resulting from the mismatch between quotas and whiting abundance. We are sure you will agree that this problem must be dealt with.

The most sensible solution to this problem is to develop a long term management plan for those fisheries which catch whiting. By this we do not mean the kind of simple

Chairman – [Niels Wichmann](mailto:nw@dkfisk.dk), tel: +45 70 10 40 40, email: [nw@dkfisk.dk](mailto:nw@dkfisk.dk)  
Secretariat - tel: +44 1224 664 754, email [nsrac@aberdeenshire.gov.uk](mailto:nsrac@aberdeenshire.gov.uk)

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Registered Office: Johnstone House, 52-54 Rose Street, Aberdeen, AB10 1HA

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management plan which sets a target fishing mortality and goes no further. We need a careful and considered approach to the development of a more comprehensive plan, which looks at a wide range of measures for achieving sustainable fisheries for whiting.

The NSRAC has given considerable thought to the preparation of long term management plans. A workshop held in Edinburgh in 2006, attended by scientists, fishers and fishery managers accepted the need to operate at higher stock levels and lower fishing mortalities. However, the workshop concluded that sustainability is not defined by a unique point on the yield versus effort curve, or setting a single value for fishing mortality. It involves the definition of economic, social and ecological goals, set within an appropriate institutional framework. It is better to set a direction of progress rather than rely on a single abstract and fixed target.

The workshop set out a series of essential features for long term management plans. Chief among these was the idea that those dependent on the fisheries must be involved in formulating plan objectives and the means for attaining them.

Later in 2006 we joined with North West Waters Regional Advisory Council to discuss further the arrangements for long term management plans. We concluded jointly that measures to reduce discarding formed an important element of any plan.

The NSRAC has now decided that resolving the problems arising with whiting discards and achieving sustainable whiting fisheries can only be achieved through the preparation of a long term management plan for the whiting fisheries. We note that a simple management plan has also been called for from the EU/Norway negotiations. The NSRAC plan for whiting would be wider in scope, however, and would address the management measures to be adopted to reduce discards and improve yields from the fishery.

We have already commenced the preparation of a management plan for whiting. A whiting development group met in January 2011. It concluded that further information is required on those fisheries that catch whiting in each Member State, and on the quantities of whiting that are discarded in each of those fisheries. We now seek assistance and support from the Commission and Member States in collecting and analysing these data. We will need to engage with scientists. Economic and social science expertise will also be required. It will be important that the management objectives which are developed are based on sound evidence and advice. However, we will need to pay for that advice.

As you know, the current arrangements for funding the RACs make insufficient provision for the funding of expert advice. If we are to join together with scientists to develop a

Chairman – [Niels Wichmann](mailto:nw@dkfisk.dk), tel: +45 70 10 40 40, email: [nw@dkfisk.dk](mailto:nw@dkfisk.dk)  
Secretariat - tel: +44 1224 664 754, email [nsrac@aberdeenshire.gov.uk](mailto:nsrac@aberdeenshire.gov.uk)

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sensible and comprehensive management plan for the whiting fisheries, with buy-in from stakeholders, we will need additional support. We would like to meet the Commission to discuss the kind of support required and how it might be delivered.

Yours sincerely,

Niels Wichmann  
Chair of the North Sea Regional Advisory Council