



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

THE DIRECTOR-GENERAL

Brussels,  
MARE C2 Ares (2011)

Mr. Niels Wichman  
Chairman  
NSRAC  
Woodhill House  
Westburn Road  
Aberdeen AB16 5GB  
Scotland

**Subject: Response to second NSRAC advice on Fishing Opportunities for 2011**

Dear Mr Wichman,

I thank the North Sea Regional Advisory Council for the second advice on Fishing Opportunities for 2011, and the support for achieving the aim of meeting international commitments to sustainable fishing. On 14 December 2010, at the end of two days of negotiations at the Fisheries Council of Ministers, political agreement was reached on TACs and quotas for Atlantic and the North Sea. The Commission has taken into account the advice and concerns of the NSRAC during the debates with Member States and third countries, and we have a result that moves the EU closer to the goal of bringing all fisheries into line with the maximum sustainable yield by 2015.

The Commission has noted your objection to the forced timeframe for reducing TACs. I would like to make clear that the commitment to bringing all EU fisheries into line with the maximum sustainable yield by 2015 has been made by the Member States of the EU, not just by the Commission. Where it was possible to meet Member States' requests within the margin provided by scientific advice, this was done.

When the cod plan was revised in 2008, this was done in part to meet industry requests that the sector itself, with the support of national authorities, should be able to develop its own solutions for reducing cod catches and cod discards. The new plan provided for incentives for fishing sectors who proved successful in doing so. This approach was developed in part because of complaints from the sector about overly-detailed technical measures being decided at a Community level.

In the course of the review of the cod plan we shall have to take stock of the initiatives taken by industry, but our initial perceptions are that the initiatives taken by the industry have, overall, failed to lead to reduction in cod mortality. For this reason, I would encourage your sectors to consider further what additional actions and initiatives could be taken to reduce cod catches and cod discards. Such initiatives and concepts might then, if proven successful, be extended to other fisheries sectors.

More generally I would like to note that the setting of individual TACs under the Common Fisheries Policy is based on the idea that fishermen are willing and able to target their fishing activities at the various species. Clearly, reduction of TACs could lead to more discards if the industry does not avoid catching species where TACs have had to be lowered on scientific advice. Under the present CFP, it is expected that the industry should, of its own initiative, avoid vulnerable species. Neither the industry nor the Commission would like to revert to very detailed technical rules if this can be avoided. As a solution for the discard problem will eventually be in the long term interest of the industry itself, the Commission would very much like to know what changes the NSRAC itself would suggest to make for a sustainable future in fisheries, in this context.

The Commission is aware of the fact that scientific knowledge and data are of vital importance to a sustainable future in fisheries, and I understand your call for an initiative for better data collection for scientific advice. The Commission presented to the Fisheries Council a proposal for Fishing Opportunities based on the fundamental principle of science-based management. In the coming years, the Commission will continue to work on improving communication between scientists, policy makers and RACs.

It is necessary that Member States and industry support a provision of scientific data to scientific agencies.

In light of this science-based approach, the Commission has taken into account the revised ICES advice of 27 September 2010 for cod in the North Sea. This was done, among other reasons, to meet the request of the NSRAC to reconsider the position in light of this new assessment. According to ICES, there has been no clear evidence since 2007 that the fishing mortality of cod has declined; recruitment since 2000 is poor and the last assessment of ICES is considered as more uncertain than the former one. The Council has adopted a long-term plan for cod in the North Sea that aims to be consistent with the precautionary approach advice and is intended to provide for sustainable fisheries and high yield leading to a target fishing mortality of 0,4. The outcomes of the negotiations at the Fisheries Council were, with a TAC decrease of twenty percent for North Sea cod, a step in this direction to the extent that the fishing industry limits its catches in accordance with TACs.

The Commission has taken note of your concerns of counter-productive effects of setting single targets for stocks to reduce fishing mortality. A stable fishing mortality implies a stable level of fishing activity and fishing effort. While stocks will fluctuate, even under these conditions, fishing at a moderate and steady rate is a sound way to provide stability for the industry and for the stocks. Within this context, the Commission supports your suggestion of a tailored, fishery by fishery approach with long term goals that allow stocks to recover to biologically safe levels.

The Council has put in place a number of long-term management plans that set precise objectives and are designed to give clear guidance on how scientific advice should be translated into figures, both quotas and fishing effort. This year, the Common Fisheries Policy will enter a new round of reforms. Long-term management plans can be revised if they are not delivering. One important step that has to be taken includes establishing and implementing additional long-term management plans to reduce the fishing pressure on overexploited stocks and restore them to MSY. The Commission intends to have more rapid progress in establishing a series of long-term management plans that set out harvest

control rules for determining management measures that aim to match any fluctuations in the stock. The NSRAC will be consulted in this course.

The Commission supports all initiatives to promote cooperation and dialogue between scientists, policymakers and stakeholders and welcomes an advice on your suggested moving from single-species management to an integrated, ecosystem-based, multispecies approach. The Commission encourages the NSRAC to participate in the meetings of the ICES working group for mixed stocks and follow their work as observers. I would like to receive your opinions on the five different scenarios that are being discussed in the working group.

Thank you again for your work.

Yours sincerely,

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

Lowri EVANS