

Greenpeace input on protection measures for Cleaver Bank

With this brief position paper Greenpeace wants to provide input into the ICES advice towards protection measures for the Cleaver Bank which is an integral part of the FIMPAS process.

According to the ministry of EL&I, Fishing activities (especially bottom trawling) constitute the most important threat to the conservation objectives that has been established by the European Union in Marine Protection Areas¹. Also scientists from all over the world agree that fisheries is the human activity which has most direct impact upon the marine ecosystem of the open sea. So it seems more than logical that protection measures for protected areas like the Cleaver Bank take the fisheries intensity and impacts into account.

The draft proposal for protection measures for the Cleaver Bank is to close down the area for bottom touching gear, with the exclusion of the Botney Cut. This will mean that the whole Cleaver Bank Natura 2000 area will be closed for bottom fisheries, but the Botney Cut will be cut by a whole zone where bottom trawling is still accepted. In our opinion, the exclusion of the Botney Cut for fisheries measures is unjustified. It may well be that the Botney Cut might not fit the characteristics of habitat 1170 to put it under Natura 2000 regulations. The fact is that the whole area – including the Botney Cut – has been characterised as Natura2000 area and also fits the OSPAR criteria. The best possible protection of the whole area needs therefore be put in place.

Besides that, research has shown that first trawl passages cause relatively the most damage to the benthic system. If one wants to protect marine habitat characteristics and keep a more natural population structure, it is better to close an area completely for all types of bottom touching fisheries than just reduce fishing pressure². Protection of 25% of a sea area with displacing fisheries leads to a net improvement of the ecological quality of the area³.

We see no reason for keeping the Botney Cut area open for bottom fisheries. It will not be efficient as a compensation measure for fisheries, because it has been calculated that fishermen will not encompass lower catches as a result of the closure of the whole Cleaver Bank area. If all of the proposed Natura 2000 areas are closed to all forms of fisheries and the behaviour of fish does not change, there will only be a negligible effect upon the numbers and biomass of the caught plaice. A total closure of the Dogger Bank, Cleaver Bank and even the Frisian Front for all types of fisheries will hardly have any effect upon the flatfish catches⁴.

Keeping a part of the area open for fisheries would also provide an additional burden on the enforcement of the fisheries limitations in the better protected areas.

The Cleaverbank is a marine area what would be suitable to be listed as a marine reserve (no take zone). The size of the area is too small to be really effective on increasing the amount of fish, fish sizes and diversity of fish species. The real value of establishing the Cleaver bank as a marine reserve is however that it will be a first but essential step towards a true network of

1 <http://noordzee.wordpress.com/category/fisheries-management-in-mpa-fimpas/>

2 Effects of fishery-free areas. A short note by Lindeboom, Asjes, Beare, Rijnsdorp and Deerenberg.

3 *ibid*

4 Dekker, W. Deerenberg, C., N. Daan, F. Storkbeck, A.G. Brinkman (2009). Marine Protected Areas and commercial fisheries: the existing fisheries in potential protected areas and a modelling study of the impact of protected areas on North Sea plaice. IMARES Report number C066/09

marine reserves. The value of marine reserves has been documented in many publications⁵. In 2007, 275 scientists affirmed the need for marine reserves and expressed their profound concern over the lack of progress in implementing marine reserve networks in European waters⁶. Marine reserves form an integral part of the solution for the worldwide problem of overfishing.

We therefore hope and trust that ICES will take the concerns of many of their fellow scientists into serious consideration whilst finalising their advice on the Doggerbank to the FIMPAS process.

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5 f.e.: Partnership for interdisciplinary studies of Coastal oceans, 2007. The Science of Marine Reserves (2nd edition, International Version). www.piscoweb.org. 22 pages or Emergency Oceans Rescue Plan: Implementing the Marine Reserves Roadmap to Recovery JN334, September 2010, Greenpeace International

6 http://www.york.ac.uk/media/environment/documents/pg/marine_reserves_consensus-1.pdf