

The North Sea Regional Advisory Council

NSRAC Secretariat
Woodhill House
Westburn Road
Aberdeen AB16 5GB
Scotland



NSRAC

24 May 2011

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

Nephrops Long Term Management Plan

In corresponding with you on a number of issues the North Sea RAC has often mentioned its wish to manage the fisheries of the North Sea through a series of linked Long Term Management Plans. Since its formation, the NSRAC has placed a strong emphasis on managing fisheries, rather than fish stocks, and on developing management plans that are much wider than simple harvest control rules.

Initially, we sought advice from experts on how best to engage with fishers in the preparation of these management plans. We then embarked upon the ambitious task of preparing a Long Term Management Plan for the *Nephrops* fishery of the North Sea. Over the past two years we have engaged with fishers at fishing ports, and talked with scientists about the best approach to be adopted. We have progressively refined a draft plan and are now reaching the final stages. A copy of the plan is attached. It must still be regarded as 'work in progress' but we hope it will show you the progress we have made.

One concern for fishers has been the proposal that came forward last year from the Commission to set individual TACs for the functional units for *Nephrops* in the North Sea. The NSRAC accepts that some form of management is required for the functional units that will take account of local depletions. However, there is no support from fishers for the allocation of quotas to each of the functional units through separate TACs. Setting specific quotas raises a number of rather difficult questions in relation to quota allocation. There is also a high risk that larger, nomadic vessels may utilise opportunities in the more distant, non-traditional units first, putting artisanal fishers at risk.

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

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Our plan proposes instead that specific measures should be adopted for each functional unit, which properly reflect the degree of risk and the particular circumstances. We propose that this should be done through the preparation of a Sustainable Fishing Plan for each functional unit.

We have embarked upon the preparation of a Sustainable Fishing Plan for one particular functional unit, the Farne Deeps. With financial support from Defra scientists at Newcastle University are embarking upon the preparation of this plan in close collaboration with the NSRAC and North Sea fishers. We hope that Farne Deeps Sustainable Fishing Plan will serve as a model for plans for the other functional units.

This work has only just begun. We are concerned, however, that the Commission will return again this year to its plans for setting TACs for the individual functional units. That would jeopardise the progress we have made. Moreover, we believe we have already established that this is not a sensible way forward.

We would like to discuss this issue further with you.

Yours sincerely,



Niels Wichmann
Chairman, North Sea Regional Advisory Council

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