



**NB This paper is intended simply as a starting-point for discussion of this topic at the November Demersal WG**

### Reducing Discards

#### 1. Introduction

- 1.1 The Commission's proposal on CFP reform contains provisions to eliminate discards through the phased introduction of a requirement to land all catches. In subsequent discussions the Commission has clarified its intention to take a *fishery-by-fishery* approach, taking fully into account the range of drivers for different types of discards. It has also been suggested that the new arrangements – contrary to the headline description as a discard ban – will, like the Norwegian approach by which it is heavily influenced, contain sufficient flexibility to accommodate the realities and practicalities of mixed fisheries, exploiting a number of stocks.
- 1.2 Against this background, and the fact that some member states but not others have supported the Commission's approach, it is crucial for the North Sea RAC to provide advice on how discard reduction could be implemented in a coherent, practical way with the involvement and cooperation of the fleets concerned.

#### 2. Progress to date

- 2.1 It is worth highlighting that the new component to the approach favoured by the Commission is a mandatory timeframe for the introduction of a requirement to record and land all catches of named species in a staged and stepwise fashion. Otherwise the approach is not dissimilar to the advice offered by the NSRAC in its 2006 position paper on discards, and subsequent papers.
- 2.2 The NSRAC recognises the strong commitment by the Commission and Norway to the reduction/elimination of discards. That commitment is shared by the NSRAC, which has already considered and made recommendations on steps to reduce discarding in the North Sea.

- 2.3 Industry needs the flexibility to allow industry-led discard initiatives and experiments to go ahead. There must be recognition that different solutions will have to be sought by different sectors of the fleet. There must be a fishery-by-fishery approach. Incentives are required to allow industry to develop its own solutions within a framework that provides confidence in the results that are being achieved.
- 2.4 There is a need to assess the levels of discards and by-catch in each fishery in cooperation with scientists. The NSRAC notes that considerable progress has already been made in achieving the full documentation of catches in many fisheries. This in itself can lead to more selective fisheries and the reduction of discards.
- 2.4 The NSRAC has urged the Commission to support and encourage pilot schemes aimed at reducing discarding and by-catches. Those initiatives should include trials of catch-quota systems.
- 2.5 The NSRAC notes that there has been a large number of discard reduction initiatives in member states since our original paper was published. It is important to learn from those successful examples.
- 2.6 In the longer term, the development of fishery-by-fishery long-term management plans, especially for the mixed fisheries of the North Sea, is seen as the best vehicle for implementing and ensuring the reduction of discards.

### **3 Overcoming obstacles**

- 3.1 Meeting the deadlines and mandatory requirements set by the Commission presents a number of political, practical, logistic and economic challenges if full compliance is to be attained. Some of these obstacles are evident but others will only emerge as the process continues. At this stage the NSRAC could play a useful role by highlighting the issues that are likely to emerge on the path to a “land all” requirement. In doing so we might provide a conduit for sharing best practice, highlight those discards that require political intervention and stimulate new thinking on solutions to reducing particular types of discards.
- 3.2 It is noted that the introduction of the Norwegian system for reducing discards developed slowly and in an adaptive way, learning from the experiences of fishermen. It therefore incorporates important flexibilities while still achieving the objective of progressively reducing discards. A complete discard ban will be almost impossible to implement and enforce and in the North Sea we will need the flexibility that the Norwegian system has developed in practice.
- 3.3 Reducing discards in the North Sea will require both a top-down and bottom up approach. There is little that stakeholders can do about regulatory discards other than to highlight where they take place, the reasons for them and the large scale on which they can take place take place if regulations are not carefully framed. The solution to regulatory discards, however, lies in the hands of the Commission, member states and

European Parliament. What is clear is that removing or amending regulations that generate discards is a precondition for a “land all” approach.

3.4 Changes that might facilitate the elimination of regulatory discarding include:

- Removal of Minimum Landing Sizes (MLSs) in some fisheries
- Removal of ‘catch composition rules’ which can often only be complied with by discarding
- Closer matching of TACs and quotas to fishing opportunities and to the abundance of fish
- Removal of effort reductions which can distort the pattern of fishing and lead to discarding

3.3 From an industry perspective, given the range of reasons for discards in different areas and fleets of the North Sea, an exercise to understand the issues at the level of individual vessels would be invaluable in providing the groundwork for a new discards policy.

3.4 An industry survey could provide a detailed understanding of:

- The specific drivers for discards, fishery by fishery
- Ideas on how to solve practical and logistical problems
- Identify the types of flexibilities necessary to make such a new discard policy work
- Identify scope for useful interventions
- Identify ways in which the stakeholders could be given incentives to participate in discard reduction initiatives
- Examine the consequences for vessels and markets of having to take the whole catch back to port
- Consider possible outlets for the disposal of non-marketable fish
- Estimate the costs of keeping, storing, landing and disposing of such material for no economic return – possibly at the expense of marketable fish
- Consider the implications for control and enforcement

3.5 It is clear that the NSRAC does have the resources to undertake such a study itself. However our role could be to encourage North Sea member states to fund such studies, to coordinate the work and disseminate the results. In doing so the NSRAC would help to lay the foundations for a workable discards policy not too dissimilar from that set out in the NSRAC 2006 paper. We are aware of a number of initiatives in member states already along these lines.