CONSEIL CONSULTATIF RÉGIONAL POUR LES EAUX OCCIDENTALES SEPTENTRIONALES
NORTH WESTERN WATERS REGIONAL ADVISORY COUNCIL
CONSEJO CONSULTIVO REGIONAL PARA LAS AGUAS NOROCCIDENTALES

Dublin, 2 August 2012

Subject: Eastern Channel Cod

Dear Director General Evans

There will clearly be a major focus on cod recovery measures this autumn, both in terms of interim measures and progress towards a new multiannual management plan, of which rebuilding the cod stocks will be a necessary part.

The North Western Waters RAC, as you may know, is preparing advice on a decisive change of direction for the Irish Sea and West of Scotland, given that the EU Cod Management Plan has been evaluated by ICES and STECF and found to be flawed in fundamental ways.

The Eastern Channel, however, finds itself in an anomalous position so far as cod management is concerned – it is geographically under the scope of the NWWRAC and has a separate TAC but is linked to the North Sea in terms of effort and management measures. It is worthy to note that even though it is biologically the same stock in both areas, the Eastern Channel cod stock has interactions with different species and more diversified fisheries than the North Sea.

We write to ensure that you are fully aware that the lack of clarity over the content of the interim changes envisaged and impasse on the future of the Cod Management Plan is creating a great deal of uncertainty amongst the principle stakeholders.

We have no clear idea about the scope of the interim measures planned by the Commission, nor the timetable for their introduction. This means we cannot know what effort reductions may apply from February 2013. Member states have already made clear that effort reductions are now causing serious economic dislocation without contributing directly to a reduction in fishing mortality.

ICES advice suggests that a further reduction of 20% in the TAC for North Sea cod (a surprising function of the application of the EU/Norway harvest control rules) may be envisaged; inevitably leading to more discards.

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The uncertainty about the short term future extends also into the long term, given the ongoing dispute between the Council/Commission and European Parliament on competence over multiannual management plans. There appears little prospect of a coherent replacement for the current plan any time soon.

For the Eastern Channel this uncertainty extends to the question of whether Area VIId will be included with the North Sea, moved to management along with the rest of the Channel, or managed as a stand-alone area. All of these options carry radically different implications.

To face such uncertainty after a decade of punitive cod recovery measures is hard to bear and does not instil confidence that the near future will be better than the recent past.

We would be pleased to receive your views on how this situation and uncertainty will be resolved. We would like to express the NWWRAC's commitment to working with the Commission and the scientists to ensure the most appropriate measures are adopted to help rebuilding cod stocks.

Yours sincerely,

Bertie Armstrong

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