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EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels,
Ares (2010)

Mr. Sam Lambourn
NWWRAC
Board Iscaigh Mhara
Crofton Road
Dun Laoghaire
Co. Dublin
Ireland

Subject: Fishing Opportunities for 2011

Dear Mr Lambourn,

I am pleased to reply to the NWWRAC's response concerning the fishing opportunities for 2011, following from the Commission's Communication[1].

The "response" paper refers throughout to the point of view of the industry, so it would be helpful if you would clarify whether this document represents a consensus point of view.

Some of the issues raised in the NWWRAC's opinion have been discussed at length when the Communication 'Implementing sustainability in EU fisheries through maximum sustainable yield'[2] was presented and discussed in 2006. However, I take note of your particular concerns.

First of all, it is not at all evident that switching to an MSY approach will require the sweeping reductions that you envisage. In many instances of the fish stock advice that we have received from ICES and STECF this year, you will have noted that there is relatively little difference between the "MSY" and "pa" approaches. Where there is a difference, it is often that the "MSY" approach requires a smaller reduction in fishing opportunities when stocks fall under a threshold biomass value. I think the evidence of the first year of implementation of this approach shows that concerns about moving to a more restrictive regime are not well founded.

I take note of your request for social and economic evaluations. Such evaluations should indeed be carried out, as is in particular the case for the development of long-term plans and their associated targets.

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[1] COM/2010/0241 final

[2] COM/2006/0360 final

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Most major stocks of interest to the EU are now fished under long-term plans – though it is true that implementation of plans has been slower in the western waters than in the North Sea, for example. I would therefore urge the NWWRAC to assist the Commission with the development of long-term plans concerning additional species, such as the Irish Sea sole. This will allow social and economic evaluations concerning the medium term to be developed.

You refer to the NWWRAC's initiative on improving data collection. This is welcome, insofar as it assists the Member States and the industry to implement existing data collection objectives. I do not support the establishment of a parallel system, though I welcome any initiatives to improve and to implement what we have. As is customary, I have to remind you that the biggest shortfall in data concerns the quantities of fish caught, discarded and landed.

You express concern about the technical issues behind MSY estimation. The latest reports of ICES and STECF are very encouraging: it is clear that very much progress has been made so far this year. While MSY estimates are inevitably provisional as they are provided in a particular technological, and environmental and ecological context (as MSY can be affected by gear selectivity, ecosystem structure and climatic changes) there is scope for updating the present estimates when any of these external variables induce change in the productivity of fish stocks.

The NWWRAC is also concerned about the potential for increased discarding. In principle, MSY fishing should lead to reduced discarding as fish have (on average) more time to grow before they are caught under an MSY strategy than a high-effort approach. This means that the mix of fish in the sea comprises fewer fish of low economic value that would tend to be discarded. We have seen in the case of North Sea haddock, for example, that following an MSY approach has led to a large reduction in discards. Use of more selective fishing gear and effort reductions played a part in achieving that success also.

Thank you for your contribution to this topic.

Yours sincerely,

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