North Western Waters Regional Advisory Council

OPINION
On stocks subject to TAC and quotas for 2009

November 2008

NWWRAC OPINION: RECOMMENDATIONS FOR STOCKS SUBJECT TO TAC AND QUOTAS FOR 2009

These Recommendations were discussed and ratified at the NWWRAC Executive Committee Meeting held in Paris the 8th of October 2008. The recommendation originated from the 4 Working Groups held in Madrid the 3rd-4th of July[1] and thus are presented here on an ICES area by area basis.

PREAMBLE - GENERAL RECOMMENDATIONS

Criteria for setting TACs: TACs should not be linked to the amount of previous year landings as this might provoke swings depending on the different fishing patterns and dynamics on fisheries.

Annual variations in TAC levels: As it stated on its Opinion dated 30th of June[2] in response to the Policy Statement 2009, the NWWRAC supports the continuity of the norm of 15% TAC change where Long Term Plans are not in force and advises caution in moving away from this principle to avoid uncertainty for fishermen activity and stocks management. However, further changes might exceptionally be accepted where there is strong supporting evidence.

Data workshops: The NWWRAC recommends that the RACs and ICES work closely together to prepare for the ICES data workshops in late 2008/early 2009 to address the most relevant data gaps in the assessment and how the industry and RACs can work to ensure that these are filled. The NWWRAC has requested to ICES to describe the format of presenting data from industry sources prior to the data compilation workshops due to be held later in 2008 or early 2009 to ensure that new and additional data coming forward is useful and can contribute effectively to the process. Also the participation in external projects such as the joint data collection programme for North Western Waters is considered crucial.

RECOMMENDATIONS FOR ICES AREA VI – West of Scotland

Cod VIa: Despite ICES assessment and advice (zero catch rate), the fishing industry perceives that a number of positive changes are taking place in this stock, recruitment is increasing and fishing mortality shows a decreasing trend. It is also worthy to note that mortality witnessed in this stock is largely natural, as it is impliedly stated in ICES advice for 2008[3]. However, it is noted by the eNGOs that special attention might be paid to the level of discards in order to have a better estimation and to avoid further increases of the fishing mortality

The fishing industry recommends that an Fpa limit be set for this species and that ICES move away from advising based on biomass levels as it is widely accepted that the biomass levels such as Blim are set too high and are unattainable in practice.

Finally, the NWWRAC believes that it is also important that work commence on the causes and actual levels of natural mortality in this stock.

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[1] The Working Group reports are available in the meeting sections of NWWRAC website: http://www.nwwrac.org/Meetings/Meetings_ENG/Navigation.php?language=English

[2] Full response: http://www.nwwrac.org/admin/publication/upload/NWWRAC_Response_EC_Policy_Statement_2009_EN.pdf

[3] See pages 175-176 of ICES Advice 2008, Book 5 → direct link: http://www.ices.dk/committe/acom/comwork/report/2008/2008/cod-scow.pdf

Haddock VIa: The NWWRAC recommends a long-term management plan for Haddock in area VIa

Haddock VIb: There is general disappointment from the NWWRAC members considering that even though the stock is doing well cuts in TACs are still being proposed. It is recommended that the Commission DO NOT reduce TAC and effort levels down to levels of catches as this would mean a 30% cut in TAC and would interfere with relative stability.

Whiting VIa: The NWWRAC would urge for an assessment of this fishery as soon as possible, so that the true status of this stock can be ascertained.

Nephrops: The NWWRAC does not support moves to reduce TAC levels to equal total catches and feel this interferes with relative stability. The NWWRAC however would support the continuation of experimental TV camera surveys and integration of its results into the assessment process for nephrops in area VI to have a better understanding about what is the situation of this stock. The NWWRAC acknowledges that the quality of the TAC implementation will depend on an effective system for monitoring catch data and supports the set up of partnership schemes with scientists and control authorities to develop initiatives on a level playing field aimed to improve the quality of data and mitigate the uncertainty on total catches which are based on estimation of removals at sea and reported landings.

RECOMMENDATIONS FOR ICES AREAS VII bchjkefg – Celtic Sea and Western Approaches

Cod VIIb-k (except d): The NWWRAC welcomes the advice received from ICES as it shows a decrease in the fishing mortality and some improvement in the spawning stock biomass in recent years in line with the perception of fishermen on the ground. The NWWRAC members have also noted that the total fishing effort has decreased in area 7f/g (the place where more than 75% of the cod catches of area 7b/k are registered) even though this trend is different from a Member state to another. This is likely to continue as a result of decommissioning schemes in place in several Member States.

Overall, considering the positive signs showed by this stock and the improvements in scientific assessment, the fishing industry members believes that proposals are neither realistic nor proportionate with regard to the state of the stock and strongly recommend that Celtic Sea and Western Channel Cod stocks should NOT be included within the scope of the Cod Recovery measures put forward by the Commission. The environmental NGOs do not share this view but believe there is a need for precautionary management of the Celtic Sea stock and that it would benefit from inclusion in the recovery plan.

The NWWRAC encourages the development of Technical Conservation Measures as a key component to manage these stocks more effectively.

Northern Hake: Fishing mortality was estimated by ICES to be around Fpa and SSB around Bpa. Although the advice was similar to 2008, the TAC advice for this year presents two alternative scenarios: a reduction of 3% of catches (51,500t) due to an apparent overestimation of the stock biomass in 2007 and in accordance with the current precautionary approach; or a 10% reduction (L = 38,600 t) leading to highest long-term yield and consistent with the forthcoming proposal on long term management. The fishing interests of the NWWRAC regards the reduction in 10% as disproportionate and would encourage the Commission to re-think about the convenience of implementing even more stringent measures for the Management Plan when the stock is clearly improving and MSY could be achieved at the current exploitation rates by 2015, as stated in the NWWRAC Opinion sent to the Commission the 13th of June[4].

[4] Link: http://www.nwwrac.org/admin/publication/upload/NWWRAC_SWWRAC_Response_Non_Paper_Northern_Hake_EN.pdf

Plaice VIIfg: The NWWRAC does not accept the ICES advice for a strong reduction of F, in the region of 75%, based on the argument that the stock size and recruitment of this stock were low due to a "noisy" assessment and a strong upward bias in last year assessment. This extraordinary reduction proposal would have a tremendous socio-economic impact and the NWWRAC instead recommends moving TAC within the 15% range.

Sole VIIfg: The NWWRAC supports ICES advice of "status quo" fishing mortality for this stock.

Nephrops: The NWWRAC notes that there are issues surrounding some of the Functional Units assessments of this stock and further analysis of the specific nature and characteristics of the discard rates and patterns in the different Nephrops fisheries and sub-areas within area VII must be undertaken. The NWWRAC highlights again the risks of basing TAC advice on average recent landings and recommends that the Commission takes into account all these circumstances when proposing TAC for this species.

Megrim, monkfish, haddock and whiting: The NWWRAC regrets that no new assessment has been performed by ICES this year due to the scarce data availability, thus rolling over the same advice as the previous year. The NWWRAC members are deeply concerned about the lack of knowledge and understanding about the situation of these species and urges ICES and relevant scientists to compile and gather data to undertake new assessments in the forthcoming years. The NWWRAC is also concerned and opposes the reductions in TACs proposed for these species linked to the uncertainty in the assessment of the situation of these stocks. Again, TACs should not be set taking as reference previous year landings as this not reflects the reality of the fishing activities.

RECOMMENDATIONS FOR ICES AREAS VIId&e - Channel Sea

Sole VIId: The NWWRAC is surprised that 34% reduction in TAC is suggested by ICES on the basis of uncertain estimate of recruitment from the 2006 year-class, despite there is low risk of stock depletion and biomass remains considerably above Bpa. . The fishing interests of the NWWRAC do not accept the need for such a deep cut in TAC. The environmental NGOs show its concern about the level of recruitment.

Sole VIIe: The NWWRAC is concerned about social and economic effects caused by unnecessary reductions in TAC. The Recovery Plan for this stock implies for 2009 a reduction of 20% in F of the updated reference period average. This would yield an F of 0.27. Commission guidance would limit the implied reduction of TAC to 15%, or 650T.

In 2006, ICES evaluated the long-term targeted Mortality F = 0.27, to be achieved gradually after a number of 3-year stages. Interpretation of the Regulation can be done in two possible ways: a further reduction in TAC to 15% in accordance with the current Recovery Plan or, alternatively, an effective roll over of the TAC would result in 21% reduction in F in 2009 consistent with 3-year stability and lower exploitation rates. The NWWRAC supports the latter, graduated approach and endorses the conclusions of a paper recently distributed by DEFRA (August 2008). It is concerned about the use of uncertain and older data, with retrospective bias and the sudden shift to F0.27 with no assessment of social and economic impacts.

The NWWRAC asks for a graduated and step approach to achieve F 0.27 as it was modeled in 2006, aiming to minimize socio-economic effects of TACs reduction for target fleets. The NWWRAC thinks this approach would achieve balance between state of exploitation of this stock and social and economic impact for fishing communities and is consistent with the final target stated for a LTM plan.

Cod VIId: The NWWRAC supports the dissociation of this stock from the one in sub-areas VIIefg in terms of TAC and quota management. The NWWRAC believes that this stock should be independently dealt with. However, special attention must be paid to the allocation of TACs to prevent impacts on relative stability and historical access rights.

RECOMMENDATIONS FOR ICES AREA VIIa – Irish Sea

Cod: Although the ICES advice is zero catches, due to low recruitment and SSB levels, it is noted that there are reports of high abundance of Cod on the ground and increases in the level of discards, which points to a difference in the actual and the modeled status of this stock.

Again the necessity of getting more reliable, complete and accurate data is reinforced. In this sense, the NWWRAC supports any initiative aimed to improve joint data collection and exchange among scientists and industry. The NWWRAC thus continue to support the implementation of the Irish Sea Discarding Programme and urge the industry, scientists and managers involved in this programme to continue the work together to ensure collection and reporting of data necessary to wisely manage the fisheries in this area.

Haddock: The NWWRAC notes that scientific advice has not adequately dealt with the correlation between haddock and cod SSB trends. As both fisheries are currently linked by the types of gears used, studies of more selective gears might be encouraged to help scientists to enable decoupling the advice.

In conclusion, the fishing industry states that current effort has proven to be sustainable and this should lead to significant increase in TAC for next year. The environmental NGOs suggest that, given that haddock is caught in a mixed fishery alongside cod, any proposal to increase the TAC for haddock is accompanied by stringent measures to ensure that by-catch of cod is minimized.

However, the uncertainty in catch data makes the task of setting clear targets difficult. The NWWRAC is keen to cooperate with the Commission in defining where we want to go in relation to this fishery.

Plaice: The NWWRAC regards this fishery as an example of success and good practices, where the fishing mortality has been decreasing at very low levels (around natural mortality). The NWWRAC believes that this fishery will achieve MSY targets very soon. The NWWRAC supports ICES advice of maintaining current levels of F.

Sole: Due to pressures such as fuel prices and current scientific advice (zero catch + recovery plan) it is likely that there will be a movement away from this fishery, as it becomes more unprofitable. It also seems that the acceleration of F and SSB might be caused more by environmental factors than to an effective increase of effort.

Whiting: The NWWRAC would like to receive clarification on whether a recovery plan will be put in place for this stock.

Nephrops: The NWWRAC considers the advice of a 15% reduction in TAC as worrying, taking into account the important economic value of this fishery. The stock has proven to be stable and even is increasing in terms of abundance (based on scientific trawl and camera surveys) and landings. It is noted that, according to the current TAC levels, no increase or displacement of fishing effort might be expected unless it is put in place as a result of another management measures (i.e. cod recovery).

The NWWRAC shows also its concern about the fact that proposals on stringent TCMs and reduction of TACs for Nephrops and Whitefish in Area VI might divert fishing effort and pressure into other sea areas including the Irish Sea.

Sharks and Rays: The NWWRAC welcomes the new assessment on these stocks. However, concern is shown for the state of some species, especially spurdog fishery and the management measures being implemented to protect the spawning aggregations (5% max. by-catch per trip), which the NWWRAC recommends to be re-thought and consider other alternative options as stated in the NWWRAC Opinion sent the 28th of May 2008[5].

[5] Link: http://www.nwwrac.org/admin/publication/upload/NWWRAC_Opinion_%205pc_by-catch_rule_SPURDOG_May_2008_en.pdf