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

10/10/2008

Subject: Response to Proposal on Technical measures for the protection of blue ling spawning aggregations in ICES area VI.

Dear Mr. Pertierra,

First of all, I would like to thank you for organizing a meeting in Brussels on the 24th of September and for inviting NWWRAC members to discuss with your office possible alternative management measures to be developed for the protection of blue ling spawning aggregations.

As you might know, some NWWRAC representatives launched a debate during the Joint Focus Group on Deep Sea Species held in Lisbon last June on guidelines for the development of the protection of this species. As a result of this, we produced an official recommendation which was submitted to your services the 22nd of September, with the aim to help prepare the discussions for the Brussels meeting.

On the 2nd of October, we received a note asking the NWWRAC to give a specific opinion on the ideas reflected in a paper named "Commission Proposal for the protection of blue ling spawners´aggregation", with two suggested options:

1. To set two protection areas where the fishing activity performed by vessels would be specifically regulated during spring season (mainly a maximum amount of catches of 6 tones per trip to those vessels having an Special Fishing Permit in the period from April to May)

2. To set up an overall catch limit of 15% of the national quota during the same period as referred in the previous point.

The Executive Committee met in Paris the 8th of October examined thoroughly the above mentioned proposals and discussed them as an agenda item. It was decided there by consensus that the NWWRAC is not in a position to choose any of the two options suggested due to the following reasons:

a) The NWWRAC feels that it is a too early stage to provide valuable and accurate input and advice. The biannual TAC proposal for 2009 and 2010 for blue ling stocks in areas VI-VII has not been announced yet by the Commission (in contrary to what has happened for other management areas). This makes it very difficult in practice to agree to any of the suggested options, as our representatives need to know first the scene or general framework regarding the amount of catches within the different management areas. The uncertainty about the level of TAC to be set in accordance with the principles stated in the Policy Statement is a major obstacle for providing adequate advice.

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b) The NWWRAC thinks that the suggested options need further detail and clarification. For example, in the map you attach it says "proposed fisheries closures" when it had been understood by our members that we were talking about protection (and not closed) areas where the maximum amount of catches would be limited during spring months (March-May) for those authorized vessels having a special fishing permit for deep sea species.

Furthermore, there is also a lack of information on the following aspects:

- Definition of the contours and extension of the protection areas: The paper gives some coordinates for drawing the boundaries but they are not complete. Moreover, the extension of the proposed areas on West of Scotland and Rosemary Bank seems to exceed those areas identified as grounds or basins of spawning aggregations with a high concentration of adults in age of reproduction.

- Figures and percentages to be applied limiting the number of catches: There does not seem to be any strong scientific evidence supporting the setting of such percentages.

A clear consensus is needed among the Commission and all relevant stakeholders before adopting any restrictive proposal.

In light of these explanations, the Executive Committee has decided to ratify the NWWRAC Recommendation on Guidelines for Blue Ling Protection, sent to the Commission the 22nd of September, which was adopted by consensus among the General Assembly members. This Recommendation is attached to this letter as Annex.

We trust that the Commission will take into consideration the specific guidelines provided in this document for preparing its forthcoming proposal to be presented before the Council of Ministers.

Yours truly,

pp Sam Lambourn
NWWRAC Chairman

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ANNEX

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NWWRAC Recommendation on Guidelines for Blue Ling Protection

September 2008

1. All parties agree that measures should be introduced to afford greater protection to the Blue Ling stock during the spawning period.

2. Furthermore, all sectors likewise agree that Blue Ling spawn at different times, in different sea areas, and not necessarily in line with the management units, thus protection zones should take note of this point. Industry agrees however that the Southern management unit (Subareas Vb, VI, and VII) spawn at a time covered by the three month period April-June.

3. Industry also agrees that some adaptation of the Commission's proposal, i.e. protection zones, should be set in place however, we emphasise the need to consider the "depth sensitive" nature of spawning aggregations.

   Catches of spawning aggregations have been reported[i] at a depth of 470 fathoms, around 870 metres. It makes sense therefore to construct protection zones around this specific characteristic. We suggest an upper and lower limit of 1100 meters and 700 metres.

4. Industry is keen to work with the Commission and the scientific institutes to improve our understanding of the stock.

[i] Anecdotal information from both the Scottish and French catching sectors

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