

Comments from the European Anglers Alliance on the Kattegat RTC Proposal

Hereby the comments on behalf of EAA on the proposal for management of the fishery in the Kattegat, discussed in the NSRAC Excom meeting last week. This proposal was presented as an alternative for a proposal laid down in a joint statement of 24th of September 2008 by DTU Aqua, Denmark and Institute of Marine Research, Swedish Board of Fisheries. The information that I received before the meeting was that the current poor state of the cod stocks in this particular area calls for drastic measures in order to reach recovery to levels that give both the commercial and recreational sector better possibilities in the future.

During the first day of the Excom meeting I explained that I would not easily opt for a regime of permanent closure, but that in this particular case there seems no other option. The cod stock is in a critical state due to permanent high fishing mortality, according to the information that I got from Sweden. Before and during the meeting I had no possibility to study the original Swedish proposal.

Having read this proposal now, my conclusion is that the scientific information is robust and confirms that the situation in the Kattegat indeed is bad and that a closure via an MPA in this case is a better investment than implementing a RTC scheme, which is insufficient to reduce the overall fishing mortality on cod.

The EAA policy is to follow the scientists advises to the extent where the scientist might be too far from reality (which can happen occasionally when things change between the latest stock estimation and the present state/reality we are to give advise about as outlined in the report, the cod stock in the Kattegat is very stationary and protection of adult fish - during the spawning season, but also outside this period - is needed. The RTC does not deliver the same results as the original proposal, in terms of decreasing fishing mortality.

Apart from that I am afraid that the RTC proposal is complicated and difficult to enforce due to the too small rectangles and the procedure envisaged of actually closing them. The whole scheme, as proposed now, has a high risk of non-compliance.

The report foresees limited effects on fisheries for Nephrops, sole and plaice while these can be undertaken outside the no take zone and after seasonal closure.

The proposal does not give in depth information what the effects are for small scale fishermen, who depend on these fisheries and who are not able to fish outside the closed zones according to the Danish fishermen's representatives at the Excom. I agree with the Danish and Swedish Excom colleagues that "killing the patient" is the wrong approach. If indeed the Swedish proposal will result in serious effects on these (or other) fisheries, a temporary financial compensation scheme would be the right answer, but I don't know if that is a serious option according to Swedish regulations. The closure is an investment in better stocks and will benefit fishermen (commercial, recreational) on the longer term.

However, we do ask the MPA scheme to be thought out well. The scheme should only be in place as long there is a need for it to avoid the MPA becomes a permanent closed area. The state of the area should be monitored year by year and the scheme to be evaluated and up for discussion every two or three years whether some fishing can take place again, which kind of gear to be allowed in and how much of it etc. We

are suggesting that the recreational fisheries are included in this scheme, which in the first instance would mean no fishing by recreational anglers and other forms of recreational fishing in this area.