



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

BALTIC SEA, NORTH SEA AND LANDLOCKED MEMBER STATES
FISHERIES CONSERVATION AND CONTROL BALTIC AND NORTH SEA

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Brussels,
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Mr. Hugo Andersson
NSRAC Secretariat
Woodhill House
Westburn Road
Aberdeen AB16 5GB
United Kingdom

RECEIVED
19 DEC 2008

Dear Mr. Andersson,

Thank you for your letter of 13 November regarding the proposal for a "Real Time Closures" scheme in the Kattegat, and the position paper on "Opportunities to reduce discards in the North Sea".

Real time closures in the Kattegat

The NSRAC is presenting two proposals for real time closures (hereinafter referred to as RTC). One of the proposals aims to protect cod during spawning, and the other aims to protect cod below minimum landing size in order to reduce discards.

We believe that your proposal to avoid concentrations of juvenile cod has the potential to reduce discards and hence reduce juvenile mortality, and should be strongly encouraged. However, we have some reservations on the likely effectiveness of the closure to protect spawning cod. We believe that a reduction on adult mortality through RTCs would be better achieved by avoiding any high concentrations of adult fish, irrespective of whether or not they are spawning at the time, and wherever they are found throughout the Kattegat. From a biological point of view, the time at which the adults are caught makes no significant difference to the impact on the reproductive capacity of the stock. Catching adults before they spawn reduces the reproductive capacity for the current season and all subsequent seasons. Catching them after they spawn reduces the reproductive capacity for all subsequent seasons. We would therefore suggest that it would be better to use the same model to protect aggregations of adult cod as you have proposed to protect aggregations of juvenile cod.

While the trial of effectiveness of RTCs is encouraged, we believe that they should complement, not replace, other measures to protect cod such as TAC restrictions, technical measures and effort limitations.

Reduction of discards in the North Sea

Following the adoption of the cod recovery plan, it is possible that there will be an increase in the cod TAC. The amount of this increase is currently being discussed in the context of the negotiations with Norway, and will be contingent on accompanying technical measures to reduce discards and ensure that fishing mortality is kept within the target of the recovery plan. In this respect, I would point out that the STECF have estimated that the Scottish cod avoidance measures resulted in an 8% reduction of cod mortality in 2008, which although welcome can only be considered as one component in a package of measures that might also include the obligation to move to other areas when aggregations of juvenile cod are found, or when the catch composition does not reflect vessels' quota allocation. The obligatory use of the "*eliminator trawl*", sorting grids for the Nephrops fisheries, or equality selective gears when quotas are almost exhausted is also being considered.

Yours Sincerely,



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