

The North Sea Regional Advisory Council

NSRAC Secretariat

Woodhill House

Westburn Road

Aberdeen AB16 5GB

Scotland



NSRAC

23 July 2009

Mr. Fokion Fotiadis
European Commission – DG Mare
99 Rue Joseph II
B1049 Brussels

Dear Sir

The NSRAC is very concerned at the lack of progress made by the Commission in dealing with discards.

The NSRAC responded favourably to the Commission's suggestions in its non-paper on the implementation of a policy to reduce unwanted by-catch and eliminate discards in European fisheries. The NSRAC endorsed a management approach focused on outcomes, as opposed to a detailed prescription of means. This was a significant step forward and moved in a direction already suggested by the RACs and some member states. Adoption of a fishery by fishery approach, and reliance on the fishing industry to develop solutions appropriate for specific fisheries, was welcomed as it would result in better governance of the fisheries. Indeed, the non-paper was a move in the direction of result-based management, which may well be the basis of future reforms to the Common Fisheries Policy.

As the NSRAC has pointed out, discards are not simply the result of fishers' actions but result directly from fisheries legislation. The quota system itself is partially responsible for discarding. Catch composition rules in particular, imposed by the Commission, result directly in discarding. Reducing discards should be considered an important factor when drafting all fisheries regulations.

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The NSRAC maintains that a discard ban should only be contemplated *in extremis*. Such a ban should not be put in place simply as a result of political posturing.

In its original response to the Commission the NSRAC committed itself to working with the Commission to reduce discarding, fishery by fishery, through a series of pilot projects. The NSRAC would now like to see progress in taking that approach forward.

Yours sincerely



Hugo Andersson
Chairman NSRAC Executive Committee

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