

French position on technical measure regulation for North Sea

Problems identified:

- One Net Rule,
- Gillnets immersion time of 24h and 48h ; the regulation should include the opportunity not to respect this time in case of emergency purpose (bad weather, illness...),
- Dredge use (conditioned by retention of at least 95% of bivalve mollusc); the percentage is not always possible to respect. French fishermen are working on proposition.
- Inconsistency with the effort group of the cod recovery plan,
- Lack of articulation with the NWRAC regulation,
- Mesh size ranges and catches composition:

Towed gear (problems identified in colored square)

Mesh Size (MS)	MS<16	16 ≤ MS < 80	45 ≤ MS < 80 ⁽¹⁾	70 ≤ MS < 120 ⁽²⁾	80 ≤ MS < 120 ⁽³⁾	80 ≤ MS < 120	120 ≤ MS
Max. cod %	2	2	2		5	5	
Max. cod, haddock, hake, saithe %	2	5	5		20	10	
Min nephrops %				70			
Max whiting %	2	2	2			5	
Min shrimp, sprat, Norway pout %		90					
Min sandeel %	95						
Min % pandalus			50				

- Use of the 120mm square panel for trawlers using a mesh size between 80 and 100mm and targeting whiting. SELECMER program implemented by the CRPM Nord Pas de Calais is still under progress but first results show that efficiency of the window in term of selectivity is not proven. So the use of the square mesh panel should not be imposed by the regulation.
- Use of 120mm mesh size for saithe. French fishermen use a 110 mm mesh size to catch saithe. This fishery has no discard, no impact on cod (0,3% of cod in catches in weight: 56t for a total catch of 19 200t) and no impact on juveniles. The stock of saithe is sustainability exploited (ICES scientific advice 2008). So there no reason to impose a change in the mesh size. The increase of the mesh size will result in serious economical loss.
- The 120mm mesh size reference (composition of catches with cod>5%).

Passive gear (problems identified in colored square)

Mesh Size (MS)	10 ≤ MS < 50	50 ≤ MS < 100	100 ≤ MS < 120	120 ≤ MS < 140	140 ≤ MS < 220	220 ≤ MS
Max. % cod	2	5	5	5		
Max. % anglerfish, turbot	2	10	10	10	10	
Max. % of cod, hake, anglerfish, megrim, turbot	2	5				
Max % sole	2	5				
Min % sole			40			
Min % eel, sprat	90					

- Use of net with a mesh size between 50 and 90mm impose a maximum of 5% of sole. Fishermen of Boulogne sur mer target sole with a net of 90mm in the English Channel and in the North Sea. French fishermen want to keep this possibility. Economic losses will be too important if they had to use a bigger mesh size.
- The maximum of 5% of cod for mesh size smaller than 140mm is difficult to respect considering the recovery of cod stock in the Eastern Channel and in the North Sea channel.