

The North Sea Regional Advisory Council

NSRAC Secretariat
Woodhill House
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Scotland



NSRAC

Mr Fokion Fotiadis
European Commission
Directorate-General for Fisheries and Maritime Affairs
B-1049 BRUSSELS
Belgium

21 June 2007

Dear Mr Fotiadis

Thank you for your comprehensive and helpful reply of 23 February to the NSRAC's Position Paper on the Commission's proposal for TACs and Quotas in 2007.

We strongly welcome and support your commitment to make "front loading" a practical reality, thus allowing time for proper consideration and discussion of the Commission's proposals. We especially look forward to the introduction of full impact assessments that would provide the means for a rational discussion and evaluation of different policy options.

There are number of points in your letter where there appears to have been a misunderstanding of the points NSRAC is making and I would like to clarify these.

In fact we are not advocating, as your letter suggests, that ICES and STECF should not be the competent advisory bodies where the data are insufficient to provide a mathematical stock assessment. What we are suggesting is that in cases where biological data are insufficient, more - not less - thought should be given to the correct management strategy. ICES and STECF certainly have a role to play but in these circumstances the involvement of fisheries managers and the industry is essential. Simply advising that because there is uncertainty we should cut the TAC every year is not being precautionary where there is other evidence suggesting a stock is relatively abundant. It is applying a mechanical and unthinking approach which frequently results in impractical management measures which do not reflect the reality on the grounds.

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In such cases ICES and STECF should either be prepared to take account of other categories of evidence (e.g. from fishermen's surveys or national Fisheries Science Partnerships), or be more prepared to listen to evidence from those with practical knowledge of the fisheries who can point to current factors affecting the fishing.

I fear also that you have misunderstood our argument for a greater understanding of the economic dimension of fisheries. Our central point is not, as your letter infers, the use of economic data to support arguments to persuade fisheries managers to defer difficult decisions necessary to achieve sustainable fisheries. Our argument is that fisheries are above all else an economic activity. Without an adequate understanding of the economic pressures, fisheries managers are not likely to understand (or predict) the response of fishing vessel operators to constraints on their activities as they strive to maintain economic viability; and will be continually surprised that their measures deliver much less than was hoped for. In fact an integration of biological and socio-economic understanding is, in our view a precondition for effective fisheries management.

For the avoidance of doubt, we agree that the primary consideration must be the conservation of fish stocks and the protection of their habitat without which there cannot be a fishing industry, but hope that the above points can be seen within this context.

I hope that the above clarifies our views and I look forward to hearing from you.

Yours sincerely



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