

- 6.1 The NSRAC accepts the agreement to set a TAC for North Sea saithe in line with the management plan and to provision being made for banking and borrowing. Saithe is doing well and is within safe biological limits. The NSRAC looks forward to seeing the ICES evaluation of the saithe management plan when it has been completed.

7. North Sea *Nephrops*

- 7.1 The NSRAC emphasises the economic importance of the fisheries for *Nephrops* and notes that the *status quo* TAC is to be maintained. If any effort reduction is imposed then any proposal for increasing the mesh size should be regarded as a substantial step towards achieving that effort reduction. Danish fishers are opposed to any reduction in days-at-sea for *Nephrops* fisheries.

8. Effort Controls

- 8.1 In relation to the Commission's future intentions with respect to effort controls the NSRAC does not wish to see the introduction of further reductions in effort. The NSRAC would prefer to see more targeted measures for cod avoidance. However, as previously intimated to the Commission, the NSRAC will progressively refine its views as the subject is considered further. There is no clear agreement within the NSRAC on the Commission's proposal for the direct limitation of the fishing effort of fleets by Member States. The NSRAC welcomes the Commission's proposal for forward-looking derogations.

3. North Sea Haddock

- 3.1 The NSRAC accepts the agreement between the EU and Norway that the TAC for North Sea haddock during 2008 should be in accordance with the agreed management plan, which would result in a reduction of 15%, provided provision for the banking and borrowing of quota is included.

4. North Sea Whiting

- 4.1 The NSRAC is alarmed at the ICES advice for an 80% cut in the TAC for whiting, which is largely based on a lack of recruitment. The assessments are weak and might be revised, and in these circumstances the NSRAC is unwilling to accept such a large reduction. Draconian measures are not appropriate at this stage, either in terms of TACs or selectivity measures. Seas at Risk and WWF abstain from a position on the whiting TAC advice.
- 4.2 The NSRAC does see a need to address selectivity measures in the different fisheries which catch whiting and is willing to consider proposals, but not blindly and in a hurry. The NSRAC is very aware of the unintended consequences of introducing measures without careful prior consideration.
- 4.3 The NSRAC would like the Commission to signal to Norway its willingness to move towards improved selectivity for whiting without agreeing specific measures at this stage. The Commission's proposals on selectivity are very broad brush, and might need to be refined for particular fisheries and métiers.
- 4.4 Danish fishers have given their support to the 120mm square mesh panel proposal from the Commission, and that proposal will be considered as part of future discussions within the NSRAC.

5. North Sea Plaice and Sole

- 5.1 The NSRAC is of the opinion that the management plan it agreed with the Commission and was consequently accepted by the Fisheries Council should be followed for North Sea plaice and sole. Other measures for reducing fishing mortality on plaice are currently being considered, including voluntary effort reductions in the first quarter of the year, decommissioning within the Dutch fleet, and improvements in selectivity, especially in the sole fishery.
- 5.2 With respect to the precautionary TACs for other flatfish species such as turbot, brill, lemon sole, etcetera, the NSRAC believes that these species should not be considered as having a linear relationship with plaice and sole.

6. North Sea Saithe

mixed fisheries of the North Sea, which catch a range of species. The Commission and Council have a responsibility to make reasoned and balanced judgements on management measures, including the determination of appropriate levels for the TACs. Taking account of these wider considerations, and exercising careful judgement, is important.

- 1.5 The NSRAC has also expressed concern over the Commission's assumptions on the degree to which effort reduction and fishing mortality has been reduced. In practice, there have been major reductions of the fleets in some Member States and fishing mortality has declined. At the time of the cod symposium the Commission could find no evidence that effort controls had been effective. That has now changed. The 2007 ICES assessment indicates that there has now been a very significant reduction in fishing mortality on cod and other demersal species, reflecting the reduction in effort which has taken place. The current state of the cod stock does not justify further reductions in days at sea.

2. North Sea Cod

- 2.1 It is now evident that the 2005 year class of cod is larger than previous estimates have suggested. Fishing mortality has been reduced and spawning stock biomass is increasing. Cod are found in large numbers in many parts of the North Sea and are present in a wide size range.
- 2.2 In these circumstances, the NSRAC is recommending that there should be a 15% increase in the TAC for cod in the North Sea in 2008. With this increase the spawning stock of cod will continue to increase and the fishing mortality on cod will be reduced to a level consistent with the EU/Norway agreement. The increase will reduce the discarding of cod. There is an abstention on the TAC recommendation for North Sea cod by Seas at Risk and the WWF. The European Angler's Alliance takes a minority position in opposing an increase in the TAC for North Sea cod.
- 2.3 The NSRAC agrees with ICES that the focus of management must be on reducing the total removal of cod, including discards, and not the landings.
- 2.4 The current position for cod is that restrictions in TACs and effort controls are relatively insensitive management measures. They are blunt instruments for reducing discards. Other additional measures will be more effective. Some of these have already been adopted. Real time area closures have been introduced in Scotland and Denmark to protect juvenile cod and consideration is now being given to protecting spawning areas and spawning periods. There is also scope for selectivity improvements. Observer programmes have also been introduced to ensure that discards of cod remain low.
- 2.5 In the longer term, and especially during 2008, the start that has been made in introducing innovative solutions for cod avoidance will be extended and refined. Consideration will be given to a range of measures, including the introduction of automated catch observation systems which provide an alternative to carrying observers.



Position Paper on Fishing Opportunities & TACs for 2008, November 2007

1. General Comments

- 1.1 The NSRAC has already responded to the Commission's Policy Statement on Fishing Opportunities for 2008 in the Northeast Atlantic Ocean and the Baltic. The NSRAC has broadly welcomed the approach of developing generic rules for those stocks that are not being managed through long term management plans. The new harvest control rules provide greater clarity and the proposals contained within the paper are moving towards making front-loading a reality.
- 1.2 However, particular concern has been expressed by the NSRAC over the way the Commission proposes to treat stocks where the quality of the assessments is poor. The treatment of these stocks has been the subject of extensive correspondence between the RAC and the Commission during 2007. Each case must be treated individually, on its merits, rather than through a formula. Where assessments are weak or not available then the Commission should seek additional information from managers and the industry.
- 1.3 Concern has also been expressed by the NSRAC over the treatment of stocks where TACs have been under-shot, and where the Commission has in the past subsequently reduced the TACs. It is not always possible to catch the full quota because of effort restrictions and for economic, management and biological reasons. It is not appropriate for the Commission to always assume that an under-shot TAC indicates that a stock is in trouble and therefore to cut the TAC. In any event, individual member states may fully take up their national shares of the TAC and they may therefore be disproportionately and unfairly affected by a cut in the TAC.
- 1.4 The NSRAC has also commented that ICES recommendations are exclusively based on biological advice and deliberately exclude consideration of management and socio-economic issues. The ICES advice is based on assessments of single stocks which need to be considered in the context of the