



North Sea RAC Position Paper on the Review of Cod Recovery Measures

Background

1. The Commission has signalled its acceptance that a review of the cod recovery plan will be undertaken during 2006. A review had been called for by the North Sea and North Western Waters RACs. In addition, ICES and STECF have highlighted the need to review the principal instruments employed in the recovery programme.
2. The focus now is on what type of review will be undertaken. Will it be narrow or broad in focus? Will it be inclusive or closed in form?
3. This paper outlines the North Sea RAC's views on the form which the Review should take and, critically, the questions it should address and the factors it should take into account.

Reason for the Review

A number of factors suggest that the time is right to review the mechanisms for cod recovery, in particular the short term target (30% annual increase in spawning stock biomass) and the principal policy instrument (reductions in days at sea):

- Current uncertainties in fisheries data have resulted in ICES failing to be able to construct stock forecasts for key recovery stocks. This means that we lack precise information of where the stock is in relation to SSB levels, and of what TACs are needed to deliver the target 30% annual increases in SSB. Correspondingly, there are no precise estimates of fishing mortality rates (harvest rates) which allow us to determine where we are relative to target mortality rates. Nevertheless, the inherent association between the pressure exerted on stocks by fishing effort and fishing mortality rates, suggests that fishing mortality rates may be a more robust target than SSB for Recovery Plans. Substituting fishing mortality for SSB as the target has the additional advantage of being consistent with a move to manage fishing rates towards those compatible with Maximum Sustainable Yield.

- As the maximum permitted numbers of days at sea have been progressively reduced, it has become apparent that pursuing this mechanism year on year becomes economically more difficult for the industry and politically more difficult for member states, as the number of days reaches or falls below the minimum needed for vessels to cover their fixed costs and stay in business.
- It is clear from the number of decommissioning schemes currently in progress, announced or under consideration in member states affected by the Cod Recovery Plan, that member states see permanent reductions in fishing capacity as a more viable method of reducing fishing effort than further constraining the activity of individual vessels.
- It is equally clear from the number of derogations in the existing scheme for more selective types of fishing (and the number of new derogations requested) that member states see measures to encourage greater selectivity for cod as an important contributory mechanism to achieving cod recovery.
- The Cod Recovery Plan focussed principally on the 100mm+ gear targeting cod and associated species, but the most recent (and first comprehensive) report from STECF on effort in the cod recovery zone makes clear that this new gear category now only accounts for 42% of cod mortality. The proportional impact of all gears that result in cod mortality will therefore of necessity be under scrutiny in the review.
- The current effort control regime has become excessively complex, causing difficulties in implementation for vessel owners and member state administrations. This does nothing to enhance the credibility of the Cod Recovery Plan or increase support for it.

Focus of the Review

In the light of these considerations a review might usefully consider:

- the most appropriate target against which to measure achievement of the objective of cod recovery;
- appropriate timescales for measuring progress against the target;
- developments in scientific knowledge, such as research on those environmental factors which are influencing cod recovery;
- the right policy instrument or mix of instruments for delivering the target, including consideration of whether measures like decommissioning and gear selectivity have an explicit role to play alongside, or instead of, more direct methods of limiting fishing effort such as days at sea;

- the right mix between measures set at Community level and measures set at national level.

Relevant Points

1. Based on the experience in the North West Atlantic and elsewhere, it would be very naïve to expect a 30% increase in mature biomass year after year. Recruitment may very well be driven by environmental conditions which we cannot influence. The proposal to manage human activities plays an important part i.e. we can try to reduce fishing mortality, but it is important to recognise that recruitment is not under our control. In other words, recovery plans must establish the milestones in fishing mortality terms rather than in biomass terms but accept that these actions will not necessarily result in an increase in biomass.
2. Should rebuilding milestones in biomass be maintained, the review should evaluate if the target biomass of 150000t is achievable under recruitment conditions observed since 1986 and what fishing mortality would be necessary to achieve the target.
3. Considerable reductions in fishing effort and fishing capacity have already been implemented. This Review should evaluate the effect of measures taken so far. If the measures are considered not to have reduced fishing mortality, it is important that explanations for their lack of effect are provided.
4. The period from the early 1960s to the mid 1980s saw an increased recruitment for gadoid stocks in the North Sea, the so-called gadoid outburst. Recruitment since the mid 1980s has been considerably lower. Bpa and Blim have been calculated using the available data i.e. from 1963 onwards. It would be important to verify if Bpa can be reached fishing at Fpa under recruitment conditions similar to those since 1986.
5. Continued increases in grey seal population abundance has led to increased predation and therefore increased natural mortality. The last time this was quantified it was the equivalent of one fishing fleet steadily increasing its fishing effort. It would be necessary to take this source of mortality fully into account in any cod recovery programme. In fact, changing predation patterns, including increased seal and seabird populations and decreased abundance of zooplankton and sandeel are potentially central to the prospects of cod recovery and as such should be fully taken into account.
6. The World Summit on Sustainable Development and its political commitment to achieve maximum sustainable yield for all fisheries by 2015, is the new context for cod recovery measures. It is important that the cod recovery programme is consistent with efforts to bring commercial stocks towards long term sustainability and stability at a high level of yield. The degree to which it is possible to maintain all stocks at something approaching MSY simultaneously is a central issue.

7. Although cod continues to make a significant contribution to landings and earnings of the fishing fleets in the North Sea, other stocks such as haddock, sole, plaice, nephrops, saithe, monkfish and whiting are the principal mainstays of the fishing economy in the North Sea. Measures taken for cod recovery reasons appear to have had significant positive consequences for these stocks. The Review should address the question of how cod recovery measures can be effective for cod without resulting in adverse economic consequences for the non-cod fisheries in the North Sea.
8. ICES scientists have emphasised the possibility of cod recovery “in the long term” if fishing effort is suppressed. Other ICES scientists have suggested that the projected impact of climate change will mean cod, which in Community waters exists at the southern extremity of its range, has no long term future in the North Sea. The Review should situate its recommendations for cod recovery within long term environmental changes and their impact on species composition in the North Sea.
9. Norway: It is axiomatic that the Review will have to take into account that North Sea cod is a stock shared and jointly managed with Norway. It is important that the NS RAC is not excluded from discussions with Norway on the future of cod recovery measures.
10. According to STECF the effort control regime has had the effect of reducing the effective mesh size in the North Sea. It is important that as far as possible the different elements of the recovery regime are consistent with each other and with the main elements of the conservation regime; anomalies and perverse effects must be avoided.

A Suggested Format for a Review of Cod.

The Review should address the following.

1. The Dynamics of the cod fishery

- 1.1 The current state of the cod stock in the North Sea including an examination of the assessments, the degree to which the information is robust, additional sources of information from the industry.

Sub stock structure, genetic pressures.

- 1.2 Examination of the drivers affecting the state of the stocks

- fishing pressures over time
- predation
- environmental change
- other factors e.g. endocrine disruption

1.3 Impact of recent Management Measures

- TACs
- Mesh Changes
- Effort regime and Decommissioning
- Closed areas

1.4 Prognosis for cod

- Forward simulations based on assumptions of recruitment and fishing mortality

1.5 Recovery targets

- What should they be, if any? (F or SSB)
- What values should be realistically ascribed to these?
- Over what timescale should these targets be achieved?

2. The Future of Cod Management

2.1 Assuming that it is agreed that recovery is possible – how should it be achieved?

What levels are appropriate and how to achieve the desirable level of fishing mortality.

2.2 The implications of WSSD commitments and long term objectives.

2.3 Is there a role for mesh size and selective gears?

2.4 Do Marine Protected Areas have a role?

2.5 Examination of effort restrictions by different fleets.

2.6 Which fisheries should be excluded from the recovery measures?

2.7 What do various management scenarios mean for different fleet sectors and their overall economics?

3. Objective: a regional management plan for North Sea cod as part of the total mix of fisheries.

- A synthesis

NS RAC as part of the Review Process

The advent of Regional Advisory Councils offers the opportunity for this Review to be undertaken with genuine stakeholder involvement.

Whilst accepting that ICES and STECF have a central role to play in the Review, it is of the utmost importance that the process should be open and transparent throughout, and should centrally involve the North Sea RAC.

At least part of the reason why cod recovery and other conservation initiatives have repeatedly failed to deliver their objectives is tied up with poor governance. The FAO Conference on sustainability has emphasised that good governance is a pre-condition for achieving the other objectives of sustainability – biological, economic, social.

The NS RAC therefore proposes a series of engagements between fisheries managers, fisheries scientists and RACs during the review process to ensure that the Review is conducted on agreed lines with the aim of ensuring a high degree of agreement with its conclusions.

These engagements should cover the following:

1. Terms of Reference/Data input and Assumptions.
2. Preliminary Findings.
3. Preliminary Conclusions/Lessons Learnt.
4. The future for cod: A revised cod recovery plan? A joint approach.

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