



ASSOCIATION OF NATIONAL ORGANISATIONS  
OF FISHING ENTERPRISES IN THE EU

Identification number in the transparency register: 2312395253-25

EP(15)47

4<sup>th</sup> May 2015

## **Development of a regulation establishing a multi-annual plan for the management of North Sea demersal fisheries**

### **Consultation response**

**Do you agree that the existing management plans need be replaced when the landing obligation comes into force? Do you think that a mixed fisheries multi-annual management plan for the North Sea, where interactions between the fisheries are taken into account, is a good approach?**

We believe it is of utmost importance that a multiannual plan for the North Sea demersal fisheries is adopted before 1 January 2019, when the landing obligation will be extended to all quota species. The current management system will be unworkable after this date.

A multiannual management plan must take into account the interactions between fish stocks such as predation and competition, fisheries and the marine ecosystem. It would be advisable for the European Commission to request ICES studies to explore the differing interactions between species in order for any future decisions on targets to be based on the best available scientific advice.

As has been repeatedly said on various occasions by Europêche in different fora, as well as biological advice on stocks, socio-economic criteria must also be incorporated into any decision taken. In this way, a full impact analysis could be taken by STECF which would ensure an all-encompassing approach. Any approach must not however be prescriptive or too detailed. Previous plans have been developed and approved through legislative procedures that have rendered them incapable of being revised, even when changes are urgently required to safeguard fish stocks and fisheries. Simplicity is therefore needed. Previous management plans have not worked due to the absence of stakeholder involvement, so the sector must be involved at every stage to help with achieving practical application of the plan.

**On scale of 1 (strongly agree) to 5 (strongly disagree), to what extent do you agree that the implementation of the landing obligation will present a major challenge for the fishing industry?**

1. Strongly agree. The landing obligation must have a workable and flexible framework for any kind of compliance. The first phase of the landing obligation for pelagics is already in place and the next phase will pose even more problems for mixed fisheries and artisanal boats. There are still a huge number of unanswered questions when it comes to choke species in mixed fisheries. The Commission must involve all the fishing sector so as to overcome any obstacles that may arise from this most radical change in fisheries management. The landing obligation, if implemented well, does have the potential to acquire much needed data on catches which will go towards building a strong knowledge base and a more successful plan.

**How should we decide which stocks should be covered by the plan? Should the plan cover any stock that is caught in the North Sea, regardless of whether the stock straddles other areas, or should it be restricted to stocks that are predominantly fished in the North Sea?**

We believe that it is indeed advisable that areas surrounding the North Sea should be taken into consideration in order to provide scientific advice and legislate accordingly since fish stocks do not respect boundaries. However, it would be an impossible task to attempt to define target species that suit all surrounding areas. There are certain anomalies around boundary lines that exist already and will continue to do so. Therefore, the focus should remain on the North Sea area itself but ensuring that the plan is compatible with plans in adjacent areas.

**The main target species are considered to be cod, haddock, saithe, whiting, sole, plaice and Nephrops. What other species do you think should be considered as important target species? If we restricted the scope of the plan to the main target species, what measures could we envisage to protect the by-catch species? Are there any by-catch species in particular that would require special consideration?**

We support the distinction made in the consultation between target and by-catch. The main target species of cod, haddock, saithe, whiting, sole, plaice and nephrops should also be extended to include monkfish and megrim since they are commercially important species and are targeted in this area. All other species would therefore be deemed as by-catch. With the measure of maximum sustainable yield in place since the latest reform of the CFP, by-catch are afforded the same protection as target species.

Currently, tools are being developed by the sector with the aim of helping to determine by-catch species by measuring the productivity of a species based on age, size and growth patterns to name a few. This would determine the *susceptibility* of a species and how likely it is that the species will survive once caught. The susceptibility of species is related to how “catchable” they are in relation to fishing patterns. This metric is based on attributes such as the overlap of the geographical range of the species with fishing activities, how likely the species is to encounter the gear and be caught in

it, and what its post-encounter survivability is likely to be. This could allow for policy makers to prioritise high risk species.

In mixed fisheries, it will prove impossible to avoid catching any non-target or non-commercial species and therefore management measures would be needed. Any major fisheries should not have to close owing to the poor status of a minor or by-catch species.

**Which ecosystem-related issues should be considered in the context of the plan, and which corresponding management tools would be required under the plan, so as to minimise negative impacts on the ecosystem?**

It is important that an ecosystem based approach to fisheries management is maintained in the plans so as to minimise the negative impacts of fishing activities on marine ecosystems and avoid degradation of the marine environment. However this must be decided at a regional level and any decision taken must be based on justifiable and accurate data.

**What technical measures (such as minimum mesh sizes, permanent or seasonal closures) do you think should be introduced at a regional level to help achieve the objectives of the plan?**

All technical measures must be decided at regional level and/or through delegated acts. This is for the sake of practicality given that the co-decision procedure is too lengthy and would not allow for urgent adaptations in light of new data. Stakeholders from the sector should be continuously involved in any discussions on the proposals and their future development to ensure their workability and to ensure the three pillars of sustainability are respected and that any outcome is practical and understandable to fishermen.

Much has already been done by fishermen to improve the status of cod in this area with more selective fishing methods and cod avoidance measures. It is clear that over time any mixed fishery management plan that includes North Sea cod may need to adopt mechanisms that achieve better management of the regional abundances of cod (based upon scientific advice when that becomes available), while restoring the whole stock as required by Article 2 of the CFP.

Management measures are also needed for non-target and/or non-commercial species. In mixed fisheries, it may be difficult to completely avoid catching non-target and/or non-commercial species. Adaptive changes to fishing patterns may go help with improving selectivity and catch composition. Nevertheless, vessels will always have trouble avoiding any unwanted catches.