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The SWW AC's response to the European Commission consultation on plans for setting 2015 fishing possibilities.

The members of the SWW AC would like to thank the European Commission for organising this consultation.

First of all, the SWW AC members take a positive view on the continuing recovery of European stocks. While the inclusion of the state of numerous Mediterranean stocks paints a somewhat darker picture, it is important not to underestimate the importance of the fact that almost 60% of stocks in the North-East Atlantic, for which statistical analysis is available, are now fished at MSY levels.

The particular clarity of this consultation document should also be underlined. It provides an unambiguous statement on the methodology that the European Commission will adopt when it puts forward its plans for regulating 2015 fishing possibilities.

The following constitutes the principal elements of analysis and comments formulated by the SWW RAC members.

The new CFP, BMSY & FMSY

The setting of 2015 fishing possibilities coincides with the first year of the new Common Fisheries Policy (CFP). While the new CFP clearly sets out harvesting objectives, their practical implementation still needs to be decided on. As representatives of the sector, SWW RAC members strongly question the feasibility of putting into place a policy which 'restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield' (Art. 2.2).

MSY reference levels for biomasses are not currently known and may well only become clear after several years of harvesting at fishing mortality levels close to Fmsy, an estimated harvesting level which is regularly revised (northern hake, blue whiting, mackerel...). Piloting the achievement of MSY should therefore be restricted to monitoring fishing mortality. Moreover, in the context of the new requirement to land all fish, MSY compliance in terms of the harvesting diagram should very soon have an impact on figures admissible for Fmsy.





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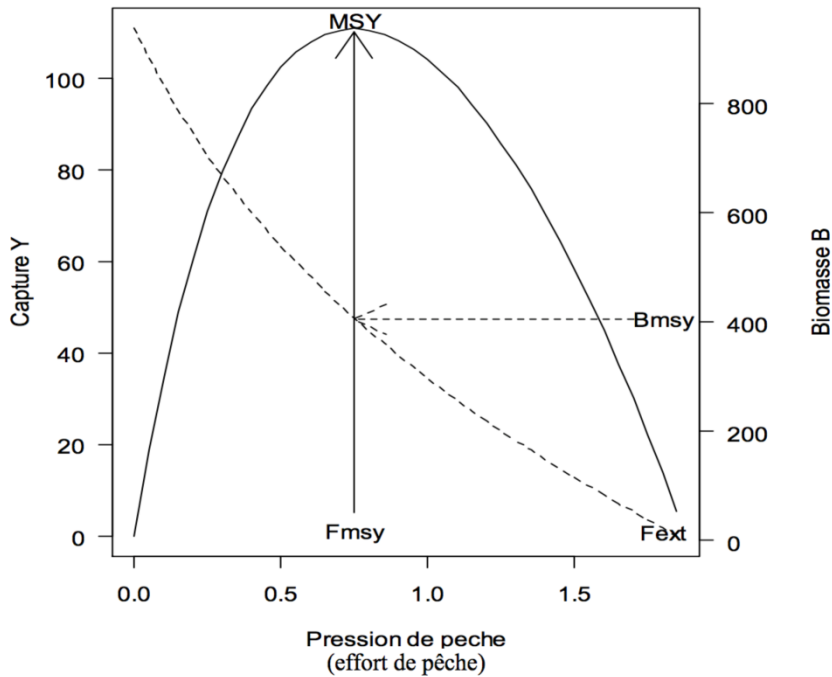


Fig.1: Developments in catches (solid line) and the biomass (dotted line) as fishing intensity increases (Source: Ifremer)

As Figure 1 shows, harvesting too far in excess of MSY levels is likely to bring about a reduction in the productivity of stocks and the sustainability of catches. Strictly from the point of view of stocks then, the theoretical levels likely to maximise productivity should be respected as far as possible.

Fmsy spreads

The Fmsy is currently evaluated by scientists within a range generally falling between $F_{0.1}$ and F_{max} . Following recommendations formulated by the institutional Task Force regarding management plans, it would certainly be positive if short term fishing possibilities were set to take account of the range of values likely to boost the productivity of stocks, such that socio-economic impacts are reduced as far as possible.

Calendar for achieving MSY

The European Commission has clearly indicated that it will put forward proposals for fishing possibilities such that next year fishing mortality is equal to FMSY for those stocks for which statistical analysis is available. This is provided that the social and economic viability of affected fleets is not compromised. As far as the SWW AC can see, the data and analysis currently available doesn't enable the elaboration of a methodology to identify such situations. The SWW AC thinks it preferable to draw the European Commission's attention to





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stocks for which, according to ICES opinions for this year, it is important to take account of the socio-economic dimension in the setting of fishing possibilities: Southern hake and sole in the Bay of Biscay.

Accounting for all catches in the implementation and achievement of MSY

For some stocks, 2015 will be the first year for which the policy of accounting for all catches will be put into place. In accordance with the new CFP (Art. 16.2), the setting of fishing possibilities for some stocks should now take account of the fact these quotas will no longer correspond to landing quotas but rather to quotas for catches. Other measures to introduce flexibility could also be implemented next year. Even though it is estimated that volumes for pelagic stocks currently returned to the sea are low, it is important that procedures be properly carried out and initiated as of the next management period.

Various remarks

- * Effort management: the SWW RAC members welcome the proposal to evaluate the added value of effort management in setting TACs, as part of a drive towards simplification.
- * Stocks thought to be stable: In addition, the method of fixing fishing possibilities adopted by the European Commission Council of Ministers since 2013 for such stocks is satisfactory. OCEANA has however emphasised that this principle should only be applied when scientific proof of this stability exists. With the new requirement to land all fish now imminent, there is an opportunity to revise the list of stocks in this situation, in particular linking it with scientific analysis on 'choke species'.
- * Stocks for which no statistical analysis is available: Unfortunately there is no scientific analysis available for many stocks in the waters falling under the SWW AC remit. However, the method adopted for setting fishing possibilities for these stocks over recent times, based on biological trends, would seem to be appropriate. Nevertheless studies should be extended to improve knowledge of stocks for which little data exists.

Main recommendations

2015 will be a critical year in the management of European fisheries, allowing as extensive a harvesting of stocks as possible within levels promoting maximum productivity of stocks. Thanks to efforts already undertaken and the general reduction in fishing mortality since 2010, the potential for harvesting with fishing mortality at MSY should very much be there next year.

The achievement of this management objective is however subject to uncertainties, which must be taken account of by political decision makers in the decision process. Taking account of these uncertainties and the potential socio-economic consequences, the procedure for achieving MSY should not be automatic but result rather from stock-by-stock analysis, as provided for in the new CFP.





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The members of SWW AC will certainly inform the European Commission of their thoughts on this subject in the future, in particular the results of analyses that they carry out on stocks that have been identified as problematic.

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