

European Commission
Directorate-General Fisheries
c/o Mr. Mr Fokion Fotiadis
Office: J-99 0/07
B-1049 BRUSSELS

Pelagic RAC
Treubstraat 17
PO Box 72
2280 AB Rijswijk
The Netherlands

Tel: +31 (0)70 336 9633
Fax: +31 (0)70 399 3004
E-mail: info@pelagic-rac.org
<http://www.pelagic-rac.org>

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Subject: Pelagic RAC response to Discards Consultation

Dear Mr. Fotiadis,

The Executive Committee of the Pelagic RAC has considered the Commission's consultation on discards and would like to put forward the following initial answers and suggestions to the questions you posed:

Question 1: What could be the role of the sector in reducing unwanted by-catches in a new discard policy?

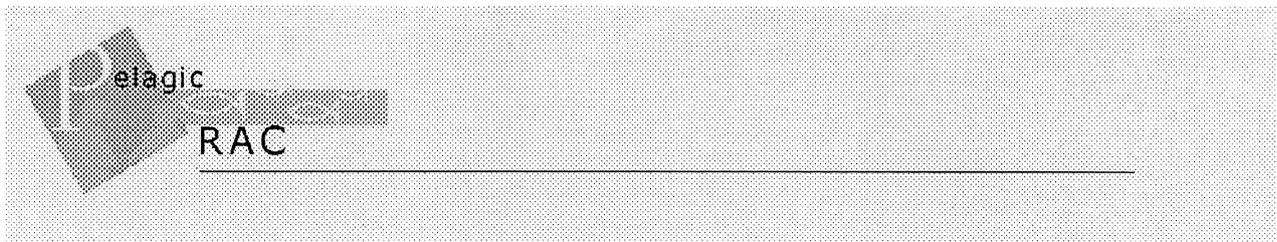
The sector strongly supports the reduction of discards and can play a role in reducing unwanted discards.

Question 2: Could the industry contribute to the identification and control of temporary area closures?

Experience teaches us that temporary area closures often lead to permanent closures. This is an area of concern that could be addressed by using the term "real-time" closures rather than "temporary" closures. It is essential that real-time closures have a defined time period and that fisheries are also reopened real time. It must be noted, however, that it is difficult to effect real-time closures for migrating pelagic stocks.

The concept of real-time closures must be considered in the context of what can realistically be achieved within the Community system. Real-time closures need to be dealt with in an efficient manner. If prompt action is required, it is doubtful whether at present the appropriate mechanisms are in place within the Commission to allow this to happen.

Question 3: Could the industry contribute to active development of more selective technologies and practices?



Yes, however the technologies are species dependent and the specifics will have to be defined. It is not possible to provide detailed examples at this time, however the Pelagic RAC will give this subject further consideration and revert with specific examples at a later stage.

Question 4: How can the initiative of the industry to improve selectivity and to apply practices which avoids unwanted by-catch best be encouraged?

First of all, it should be noted that the industry has already developed and adopted several technical solutions to avoid unwanted by-catch, such as sonar. What is now required, is support to develop new technologies.

Projects aimed at improving selectivity and avoiding unwanted by-catch should be supported by EU structural funds, including covering fuel costs. Well-defined projects should also be provided with 'scientific quota' to compensate for missed fishing opportunities.

It is also important to realise that complete elimination of discards may be unfeasible. Hence, measures should also focus on market solutions, i.e. to find commercial outlets for bycatch.

There are many ongoing projects within the Community, including work on more fuel efficient fishing gears, and the Commission should consider putting in place a mechanism to draw together the various initiatives to help spread knowledge and share best-practice, for example organising a seminar on the subject.

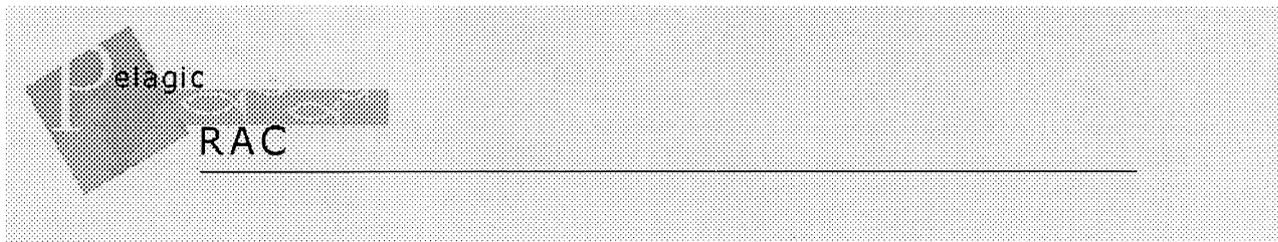
Fleet practices can be of importance in relation to the accreditation of, for example, the MSC label, and this could also play a role in the application of best practice. In order to achieve certification of fisheries, fleets need to document their practices and procedures. These Codes of Practice are publicly available.

The flexibility to bank or borrow 10% of catches from one year to the next for all stocks would also contribute to a reduction in discards. This is a facility that the Pelagic RAC has supported for some time to assist in this purpose.

Question 5: How could a monitoring system which enables information exchange in the fleet on areas with risk of high unwanted by-catch and management of real time closures best be implemented?

The pelagic fleets already communicate well with one another on an informal basis when fishing on the grounds. A culture of trust and openness is required if fishermen are to be expected to pass information from the grounds on a more formal basis to the fisheries managers. For instance, fishermen need to feel confident that if an area is closed it will be re-opened again later.

Observer programmes may also be an important tool; however they must be well-defined and not overly-burdensome. The use or application of more advanced techniques and technologies, such as automatic image analysis, will also be considered.



The EU Data Directive should be utilised more fully to obtain information on the levels of by-catch and discards in various fisheries.

Question 6: How to deal with landings of unwanted by-catch?

It is unrealistic for the Commission to expect to be able to eliminate discards completely. Obviously, in some instances it is reasonable for catches to be used for fish meal.

In general, it is felt that this question is too broad. The question should be re-defined to state the different types of by-catch in pelagic fisheries and how these could be dealt with in a more specific manner.

Question 7: What are the fisheries where the problem of unwanted by-catch is most substantial and where a new approach through a specific regulation may have most potential to reduce them?

There is a need to distinguish between by-catch and discards as in some fisheries there are by-catches which are landed and accounted for.

The subject of discards is highly complex and multi-faceted. There is a need for more precise descriptions of terms used by the Commission. For example, what is meant by "most substantial?" Once the subject is better defined, the RAC can reflect on what fisheries pose a particular problem.

The matter of communication of this exercise is crucially important and should be the subject of detailed discussion between the Commission and the RACs. General debates on this topic could give out a very negative message. In addition, there are concerns that the Commission is making a moral issue out of what is really a technical issue.

In addition to the answers above, the Pelagic RAC wishes to make it clear that a discard ban alone will not achieve the objective as it would require that all fish are brought ashore. In order to encourage the fishermen to land their entire catch it is important that a compensation scheme is set up. A discard ban needs to be precisely formulated, well defined, and needs to be carried out within an appropriate framework.

Yours sincerely,

Ingvild Harkes
PELAGIC RAC