



European Commission
Directorate-General Fisheries
c/o Mr. Mr Fokion Fotiadis
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Subject: Pelagic RAC response to discards non-paper

Dear Mr. Fotiadis,

The pelagic RAC takes the opportunity to comment on the Commission's non-paper on discards. Since this non-paper focuses on Nephrops fisheries in Area VII and the flatfish beam trawl fishery in the North Sea, the Pelagic RAC will confine its comments to the Commission's proposed general methodology and a number of issues most relevant to the pelagic industry.

First of all, the Pelagic RAC supports your general approach of dealing with the discards issue on a fishery by fishery basis rather than a common approach for all fisheries. It also supports the setting of maximum levels of unwanted by-catch/discards and leaving the task to the industry to apply the best available and possible solutions in each fishery to comply with the target levels in line with a results-based management.

The pelagic fishing is a relatively clean fishery with low levels of by-catch of non-target species. Where discarding does take place it is most often related to unavailability of quota for a particular species in a given area.

Any approach to reduce discard levels in the pelagic fisheries should be based on the actual discard levels of the active pelagic fleets in the EU in the different pelagic fisheries, and the reasons associated with these discard practices. To ascertain the levels of discards in each of the pelagic fisheries requires the collection of verified data acceptable to the scientists. There exists a lack of discard data of all fleets active in pelagic fisheries and it is only on the basis of sufficient and reliable data one can set objectives that have a basis in reality. Should a reliable data set be available the stakeholders are confident it will show a low level of discards in pelagic fisheries. A working and transparent data collection system would also improve the scientific insight in the stocks leading to better management advice.

The Pelagic RAC furthermore would like to comment on a few issues in more detail.

A. Area closures

The pelagic fleets 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. Area closures for pelagic fisheries particularly if trying to avoid juveniles are useless until they can be introduced within a matter of hours as pelagic shoals move very quickly. The only way such closures can be effective is on a voluntary basis with the full co-operation of the all the pelagic vessels operating in the area. For instance, experience has learned that temporary area closures often lead to permanent closures. It is therefore essential that area closures have a defined time period and that fisheries are also reopened after the defined time period. More research is also needed to measure the effects of area closures for migrating pelagic stocks.

B. Selective technologies and best practice

It should be noted that the pelagic industry has developed and implemented several technical solutions to avoid or limit unwanted by-catch, such as sonar systems and gear technology. What is now required, is financial support to further develop existing and new technologies. The pelagic industry is willing to contribute to the active development of selectivity methods, technologies and practices. Currently, the Pelagic RAC is actively looking into ways how to reduce discards in the mackerel fishery. Promising solutions such as test-jigging have been suggested already. When proven functional, these should be implemented as quickly as possible. Projects aiming at improving selectivity and avoiding/limiting unwanted by-catch should be supported by EU funds. Well-defined projects should also be provided with 'scientific quota' to compensate for missed fishing opportunities.

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 and could help with reducing the amount of unwanted by-catch and discards.

C. Planned time-frame to reduce discards

The subject of discards is highly complex and multi-faceted and cannot be solved overnight. Development of new technologies and setting up monitoring programmes requires time. Also, levels of discards fluctuate per year and per season. The starting phase of the time-frame to reduce discards should therefore allow time for developing and implementing such measures.

The pelagic RAC looks forward to your response and to further consultation, when discards in the pelagic industry will be dealt with specifically by the Commission, later this year.

Yours sincerely,



Ms Aukje Coers
Pelagische RAC

c.c. Ms Lisa Borges, Ms Isabelle Viallon, (by e-mail)