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Date: 15 August 2014  
Our reference: 1314PRAC161  
Subject: Opinion on policy statement  
CC: Evangelia Georgitsi (by email)

Dear Ms Evans,

With this letter the Pelagic AC would like to thank you for providing it with the opportunity to comment on the Commission's communication to the European Parliament and the Council regarding a consultation on fishing opportunities for 2015 under the Common Fisheries Policy.

The Pelagic AC welcomes the Commission's efforts to facilitate development and implementation of multiannual plans and welcomes the statement that the inter-institutional deadlock has been resolved. We can only express our hope that this solution allows for a smooth and speedy process of adopting multiannual management plans. We agree that these plans should provide a robust and lasting management framework ensuring both the sustainable exploitation of fish resources as well as high and stable yields for the industry. As you are well aware most of the stocks in the remit of the Pelagic AC are currently managed according to multiannual plans. In many cases these plans are agreed at Coastal States level, therefore involving international parties. The Pelagic AC would like to know if there is going to be a duplicate or parallel process whereby Member States are going to develop regional multiannual plans for these same stocks.

One of the management plans that has been developed by the Pelagic AC and been evaluated as precautionary by ICES in 2012 and confirmed to still be precautionary in 2014 is the management plan for herring in the Celtic Sea and South of Ireland. The Pelagic AC therefore would like to ask the Commission to base its TAC proposal for 2015 on the multiannual management plan.

At the same time the Pelagic AC supports the Commission's intention to propose TACs in line with MSY advice and only to accept delays beyond 2015, but not later than 2020, to ensure that the social and economic sustainability of the fishing fleets involved is not seriously jeopardised. It is essential that the Commission clarifies who must provide what evidence in such requests for delays, and by when and whom it is validated. Also, any request for delay should include clear indications of how fishing mortality will be



progressively and incrementally reduced to meet the MSY exploitation rate as soon as possible to restore and maintain populations of fish stocks above biomass levels capable of producing MSY and be made publicly available.

The Commission also states that once MSY has been achieved, *“the Commission will, as appropriate, propose measures to enable further rebuilding”* (page 1, paragraph 3). What is meant by this statement and what specific actions does the Commission propose?

For stocks lacking scientific advice the Commission intends to apply the precautionary approach in a systematic, predefined and transparent way. However, no information is provided on how such an application will be defined and the Pelagic AC would like the Commission to present more details on the application of the precautionary approach. When warranted, it is essential to actually reduce fishing mortality and not only fishing opportunities.

Management simplification is another priority under the CFP and the Commission states that the added value of fishing effort limitations in addition to TACs will be examined. The Pelagic AC considers an effort regime in pelagic fisheries is totally inappropriate for the management of pelagic fisheries due to the nature of pelagic fisheries and this has been accepted by all parties (i.e. Commission, Member States, scientists and stakeholders). Instead of introducing effort regimes in pelagic fisheries the Commission should ensure that TACs are fully adhered to.

With the landing obligation entering into force on 1 January 2015 for pelagic fisheries TACs may be increased to reflect catches which were previously discarded as long as MSY is not jeopardized. The Pelagic AC fully agrees that such quota increases should be based on ICES advice on catch limits and be in line with the MSY objective. However, most pelagic stocks are shared with third countries and therefore subject to international negotiations. The Commission does not provide any information on how such quota uplifts could evolve and the Pelagic AC would like to receive more information on this international aspect.

Information provided on pelagic stocks in the Northeast Atlantic is very limited and rather general. The Pelagic AC would have appreciated a more nuanced description of the state of the stocks including information on biomass levels capable of producing MSY, current efforts to fix the management plan for Western horse mackerel and the state of affairs regarding the management of stocks shared with third countries. While the Commission points out that finally an agreement has been reached with other Coastal States on the sustainable exploitation of the mackerel stock, it fails to mention that the situation for Atlanto-Scandian herring has deteriorated.

In case you have any further questions please do not hesitate to contact the secretariat.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Ohms'.

Verena Ohms  
Executive Secretary Pelagic AC