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Date: 19 May 2017
Our reference: 1617/ PAC 94
Subject: Comments to the draft pelagic discard plan in the NWW

Dear Mr Welvaert,

In response to the very short deadline you have given us to comment on the draft joint recommendation by the NWW regional group on a new discard plan for pelagic fisheries please see our comments and recommendations below.

Please note that all recommendations have been unanimously endorsed by the Executive Committee.

De minimis exemptions

In addition to the de minimis recommendations provided in our previous recommendation we would also like to recommend a de minimis for boarfish of up to a maximum of 1% of the TAC for boarfish in the fishery targeting horse mackerel with pelagic freezer-trawlers using mid-water trawls in ICES areas 6 and 7. STECF has previously confirmed that such an exemption is warranted on the basis that increasing selectivity in this fishery is difficult and that additional handling costs are significant.¹

High survivability exemptions

The Pelagic AC recommends a roll-over of the high survivability exemption of the current pelagic discard plan in the NWW. However, this exemption should be revisited as new scientific insights become available. This refers in particular to the Norwegian research project "RedSlip" which is expected to present its conclusions by the end of 2017.

¹ https://stecf.jrc.ec.europa.eu/documents/43805/812327/2014-07_STECF+PLEN+14-02_JRC91540.pdf



Monitoring and data collection

The Pelagic AC would like to re-emphasize that it is of paramount importance to appropriately monitor the use of all exemptions and to properly record all data in relation to using exemptions. Furthermore, these data must be made available to ICES and STECF.

Documentation of catches

The Pelagic AC recommends that under section 9: *Documentation of catches* the mandatory collection of gramme sizes on a haul-by-haul basis will be included. As pointed out previously, members of the Pelagic AC consider gramme sizes a cost-efficient, yet effective real-time monitoring tool.

Mesh sizes in pelagic fisheries

Increasing mesh sizes in pelagic fisheries is considered inappropriate as a tool to increase selectivity based on scientific studies which have shown that an increase of mesh sizes leads to a high mortality of escaping fish. The high mortality is mainly caused by the loss of scales which easily leads to secondary infections and osmotic imbalance. Several studies reported by Kennelly (2007)² have clearly demonstrated that for pelagic species incurring such high post-escape mortality, there is no biological or economic justification for mesh size increases. Clearly, unless the level of escape mortality is known, the benefits of a change in selectivity could be largely overestimated. The problem of poor survival after escape appears to be a common characteristic of many pelagic trawl fisheries. These are compelling reasons for not increasing mesh sizes in pelagic trawls as the necessity to minimize meshing outweighs the potential conservation benefits.

Informal regional subgroup for pelagic fisheries

The Pelagic AC is fully aware of the Member States' unwillingness to have an (informal) regional subgroup for pelagic fisheries despite its necessity for ensuring an appropriate consultation process as well as a coherent regulatory framework across regions. Nevertheless, the Pelagic AC welcomes the regional groups' agreement to an annual meeting at which the regional groups present their annual work programs. This will greatly enhance collaboration and set clear expectancies for all parties concerned. We are looking forward to receiving the regional groups' invitation to this annual meeting.

In case you have any questions concerning this recommendation please do not hesitate to contact the secretariat.

Yours sincerely,

A handwritten signature in blue ink that reads 'Jesper Raakjær'.

Jesper Raakjær
Chairman Pelagic AC

² Kennelly, S. J. (2007). By-catch reduction in the world's fisheries. *Methods and Technologies in Fish Biology and Fisheries*. Volume 7. Springer, The Netherlands.