

Initial comments from members on the EC non-paper on management without catch option tables

From CNPMMEM :

Given the very short delays to react, these elements weren't debated within all French professional organizations. Please note that they are not a French position, only comments. The others French representatives are now invited to give their opinion to the RAC's (ACFA's meeting on 12th of February and Commission's meeting on the 13th).

About the non paper:

- Understanding question:

Part « Towards a workable system »: the link between point 1 and 2 is not very clear. We may understand that point 1 applies when the level of F is known compared with F_{MSY} and point 2 if we don't have that information but only tendencies on the stocks thanks to the CPUE, may we?

- On the document's content:

Point 1 on TAC's variation +/- 15% doesn't seem to be appropriate; this automatism could be dangerous both in case of decrease or increase. A decrease of 15% could be very penalizing for some stocks which socioeconomic issues are very strong. Besides, an increase of 15% can cause some market problem. In addition, the current proposal for stocks where there is a scientific quantified recommendation with $F > F_{MSY}$, isn't consistently - 15%. Then the proposal could be more restrictive for these stocks because of the lack of quantified data leading to a quantified assessment.

The principle is to rely on experts' advice but in a new scientific framework ; these experts should also take into account the evolution of exploitation diagrams, notion not mentioned in the document. **Thus the variation of +/-15% should be modulated by the evolution of exploitation diagram if this information is available.**

In order to take into account socioeconomics/market/evolution of the exploitation diagram aspects, it seems important to consult RACs. The new timing of scientific advice delivery (June, with a presentation to RACs in July) authorizes RACs to deliver an advice in October for instance.

We quite agree with point 2: in theory it makes it possible at least to take into account observed tendencies. And it should be more in line with professional observations. **But nothing is proposed when CPUE stay between +0 and +20%.** We may propose a table:

between 0 and 10% of TAC, if CPUE: +5% TAC
between 10 and 15% of TAC, if CPUE : +10%
between 15 and 20% of TAC, if CPUE : +15%
between 20 and 25% of TAC, if CPUE : +20%

...

without forgetting to submit it to RACs' advice (socioeconomics/market issues).

Besides, more generally, it seems important that **joint groups ICES/STECF following these stocks could give a common advice by integrating socioeconomics from the beginning.**

Concerning representative survey, it seems important to precise what it is. Is an approval by ICES consistently necessary or some studies from national scientific institutes are sufficient? Do they have to fulfil the DCR regulation or can they be led in another framework? It might be reasonable not to wait for an ICES validation, but to use all available studies that are approved by a national scientific institute (such as IFREMER in France).

With a restrictive TAC, the proposal is to reduce the TAC by 15% (TAC consumption > 85%) and if not, to reduce it by 10% more (then 25%). **Why that choice to reduce TAC by 10% consistently (why not 5 or 15%...)? This additional decrease might be modulated in regard to the TAC's restriction level and RAC's might be consulted on this point.**

From the formulation of point 3, we can think that some proofs must be given when the TAC is not restrictive. But, depending on the definition consumption > or < 85%, either it is, or it is not. In the point 3 with a no restrictive TAC, it is written that we can modify the quota, but without any precision on the level. A limit to the decrease must be added. The table proposed on point 2 could be an alternative.

We think that **it should be indicated that the Commission will have to review its proposal in the light of the RAC's advice.**

Comments from WWF on behalf of the NGOs:

1) Focus of pelagic RAC will be on the pelagic species

2) One general rule is not adequate

3) Overall, the approach is positive in the sense that it provides a simple, understandable and straightforward process to operate within a data-poor context. However, this said, any data-poor management has to be adaptive and precautionary, and at this regard the approach proposed raises some concerns.

4) The reference point, FMSY, is taken as a target, rather as a limit that shouldn't be reached. Although at the Johannesburg summit it is agreed that MSY should be taken as a target, it is well known that setting MSY as a target reference point often leads to overfishing. A much more precautionary target reference limit would be F0.1

5) Another issue of concern is that the management strategy proposed is symmetric, meaning same reduction or increases are to be applied either in case of overfishing (right side of the curve) or underfishing (left side). This contrasts with the dynamics of real fisheries, which show very different situations on the two sides of the production curve (underfished and overfished sides). Indeed, it is much easier for the fisheries system to go towards overfishing than towards the opposite sense after overfishing has been reached. From this it derives that the proposed symmetry of a constant increase either for underfishing or overfishing is not precautionary and might easily result in overfishing.

6) Besides, the basic system proposed is very rigid, not adaptive. Rates of TAC increase/decrease should be different depending on the situation of the stock, even with respect to MSY (whether it is very close or very far).

7) Use of CPUE as a proxy of stock biomass is very controversial. In any case the procedure for calculating CPUE should be clearly defined and standardized from the start, so that it is not prone to manipulations or to yield artifactual information (for example, CPUE should be estimated always using the same effort, in the same areas and seasons, etc.). Also, it should take into account the possible effects of technological creep during the time periods considered.

In summary, the proposal is welcome but might need some adjustments to ensure the resultant management scheme is both precautionary and adaptive.

Conclusions

Note that the two above comments came from single members, but they have not been discussed in a plenary in the RAC. You can quote them if you find them useful, but make sure they do not come across as a RAC view (and be recorded in the minutes as such, because there was some discussion on it already).

On the other hand, please feel free to join in the discussion as much as you feel like! You are probably one of the few or the only participant there with a background in pelagics.

What we do all agree on I assume, and which would be safe to put fwd on behalf of the RAC:

- We appreciate the fact that the Commission is seeking creative tools to deal with these stocks;
- We feel that CPUEs are not a useful indicator for trends in the stock, because CPUE is a rather insensitive measure to increases and declines in pelagic stocks;
- We are happy to engage in a dialogue with the Commission on how the pelagic stocks could be dealt with in a creative way, possibly using commercial fleet data (e.g. sonar data? → the PFA is doing a trial to investigate this in the Pacific)

Good luck, and enjoy!

Regards
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