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European Commission  
Directorate-General Fisheries and Maritime Affairs  
Att. Mr Reinhard Priebe  
Rue de la Loi 200  
B 1049 Brussels  
BELGIUM

Date: 22 February 2007  
Our reference: PRAC07.05/IH  
Subject: Technical Conservation Measures

Dear Mr Priebe,

In response to your request for more elaborate comments and input by the Pelagic RAC on the Commission's consultation on technical measures (proposal to replace Council Regulation 850/98), and after having discussed the paper in detail during the Working Group meetings on February 7<sup>th</sup> and the last Executive Committee meeting on the 21<sup>st</sup> February, the Pelagic RAC has formulated the following viewpoints and recommendations:

#### **a) Simplification**

The form in which the technical measures regulations are currently presented, with the main document and regulations in separate documents, is viewed as impractical. Taking note of the historical background and rationale for the current form, it is felt that the pelagic industry would gain from a comprehensive document which includes all technical regulations applicable to its fishing activities.

It is further recommended that the competence to make amendments to the technical measures should continue to lie with the Council. In specific and well-defined cases this competence could be devolved to the Management Committee. In all cases however, it is of the utmost importance that in designing (new) technical measures the industry as primary stakeholder has a real input in the process.

## **b) Effectiveness of existing measures**

Most of the present measures to regulate the fishery were felt to be effective, with the exception of the setting of minimum or maximum mesh sizes (see point d).

## **c) Harmonisation/regionalisation**

In line with the proposal under point a, it was suggested that a comprehensive document could be drafted which listed all technical measures related to a specific geographical area for each of the pelagic species. To assist compliance the document should list the measures both geographically and by species within that geographical area. For example, all of the measures applicable to fishing for herring in Area VIa North listed together.

## **d) Mesh sizes**

The setting of minimum or maximum mesh sizes seems to have no relevance to the pelagic fisheries (see attachment). This issue was already dealt with in a letter sent by the Pelagic RAC on 20 November 2006, but it is worth reiterating here. In the pelagic fisheries the nets are chosen on the basis of the stock being targeted and neither too small nor too large meshes are being used in order to avoid 'meshing' while simultaneously ensuring adequate speed of the net.

Furthermore, in the pelagic fisheries, small meshes are not the appropriate measure to protect juveniles. Selectivity is best achieved through the use of the latest bridge technology, including high frequency sonar equipment, to give a good definition of the shoals. Other effective measures in the protection of juveniles are already being accommodated in other existing regulations and measures such as the establishment of closed areas.

The Pelagic RAC therefore recommends abandoning the non-paper point concerning mesh size for the pelagic fisheries.

## **e) Closed areas/seasons**

Last year, the Pelagic RAC recommended that the Butt of Lewis herring closure be removed and the Commission has included the removal of the Box in their Long-term Plan for the Management of the Stock of Herring to the West of Scotland (DG Fish non-paper dated 20 June 2006). It is noted, however, that the management plan is unlikely to be in place until 2008. The removal of the Butt of Lewis box should not be held up by the technical measures review. Hence, the Pelagic RAC recommends that the proposal for removal of the Box is extracted from the management plan and from the technical measures review and that the Commission proceeds with its removal without further delay.

Other closures should be considered on a case-by-case basis and fully evaluated in terms of their effectiveness. It was agreed, for instance, that as long as there are recruitment problems, the closed areas in the North Sea should remain in place to protect juvenile herring.

The Pelagic RAC will be pleased to be part of the consultation that will follow a STECF meeting, which is due shortly, to decide on the guidelines for reviewing closures.

**f) Minimum landing sizes**

There are no changes recommended concerning the minimum landing sizes for pelagic fish.

**g) Discards**

It is acknowledged that a level of discards in pelagic fisheries exists. However, it is difficult to quantify this level as it changes through time and area. It should also be realised that, wherever possible, fishermen will try to avoid discards. Therefore, the Pelagic RAC will endeavour to work with scientists to confirm the extent of the discards problem in the various pelagic fisheries.

The subject will be put on the agenda of the Pelagic RAC Working Groups again after the Commission communication becomes available in March.

**h) Marine environment**

It is important to instigate an active dialogue between managers and the pelagic industry when closed areas for corals or other conservation measures are being proposed. Participation of pelagic fishermen in a cetacean observer scheme has shown no incidence of cetacean bycatch. It is also well known that the pelagic fisheries have little or no impact on the seabed. The Pelagic RAC therefore recommends that where environmental closures are proposed for areas where scientific reports show that pelagic fisheries have no impact, exemption should be made for pelagic fisheries.

**i) Evaluation**

The Pelagic RAC recommends a full evaluation of the current technical measures and an ongoing periodic review thereafter.

Yours sincerely,



PELAGIC RAC

Ingvild Harkes

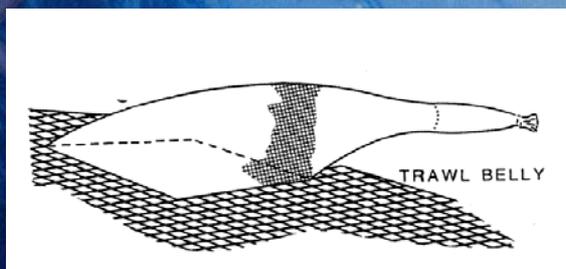
# PELAGIC TRAWL SELECTIVITY ISSUES

## Pelagic RAC

Dominic Rihan, WGFTFB

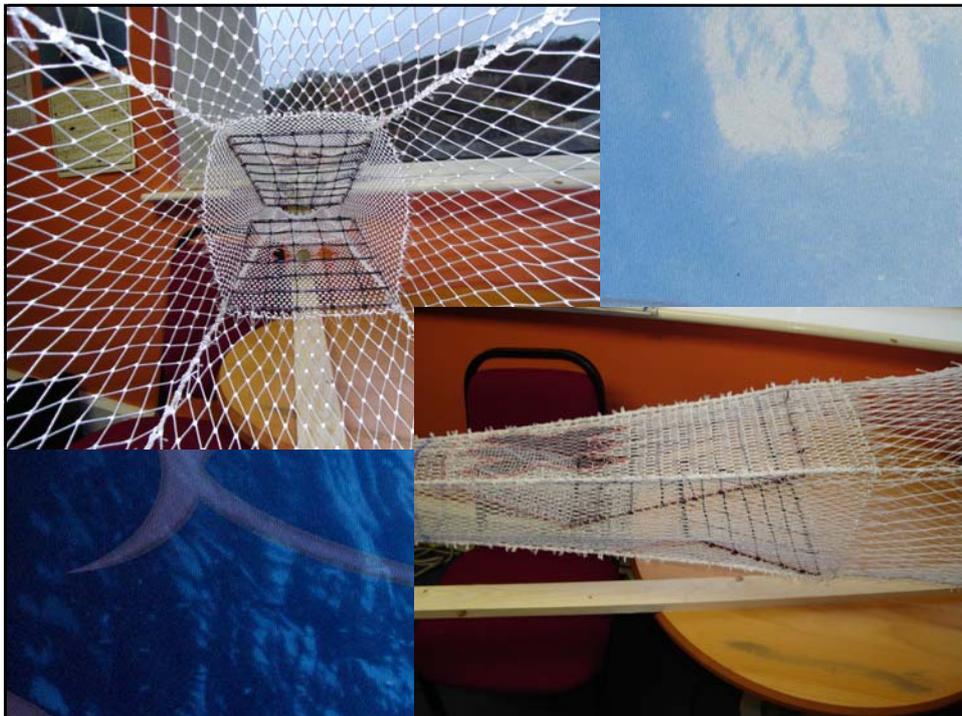
## Selectivity

- Limited research into size or species selectivity
- Complex
- Escapement and meshing
- Size selectivity is not encouraged in some fisheries so mesh sizes are small
- Mesh size based on marketing and management reasons



## Selectivity

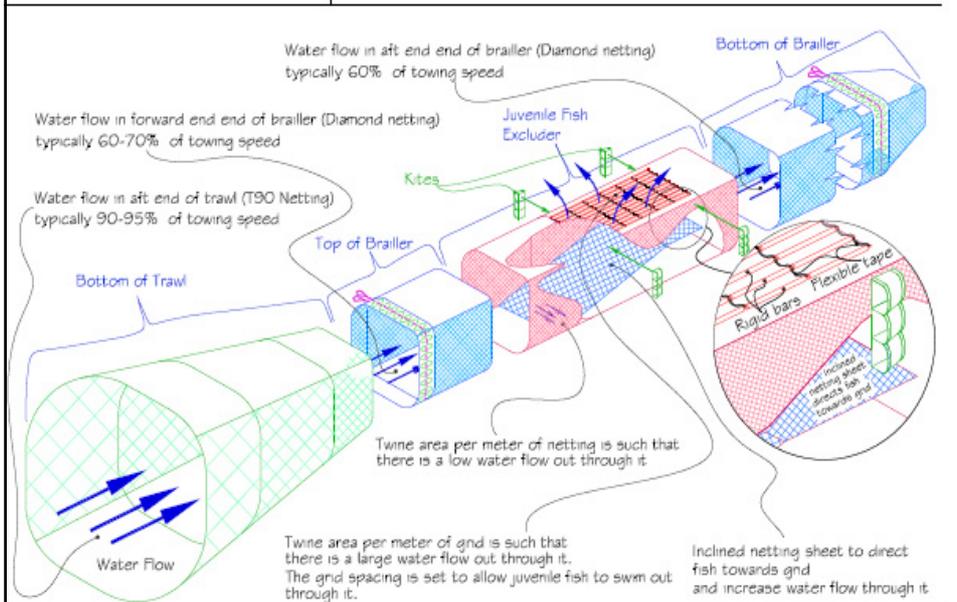
- Size selection devices
- Rigid grids tested in Norwegian purse & trawl fisheries
- Selection results good but post-capture survival show high induced mortality
- Square mesh codends also tested but severe meshing problems
- Species and size selectivity experiments under EU SELMITRA project not positive
- Flexi-grid devices





**KT Nets**  
**October 2006**

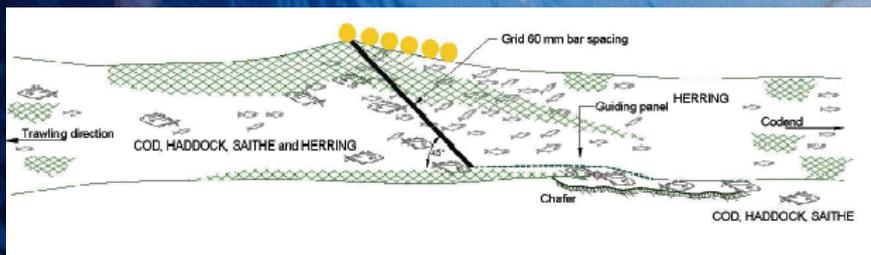
## Juvenile Fish Excluder

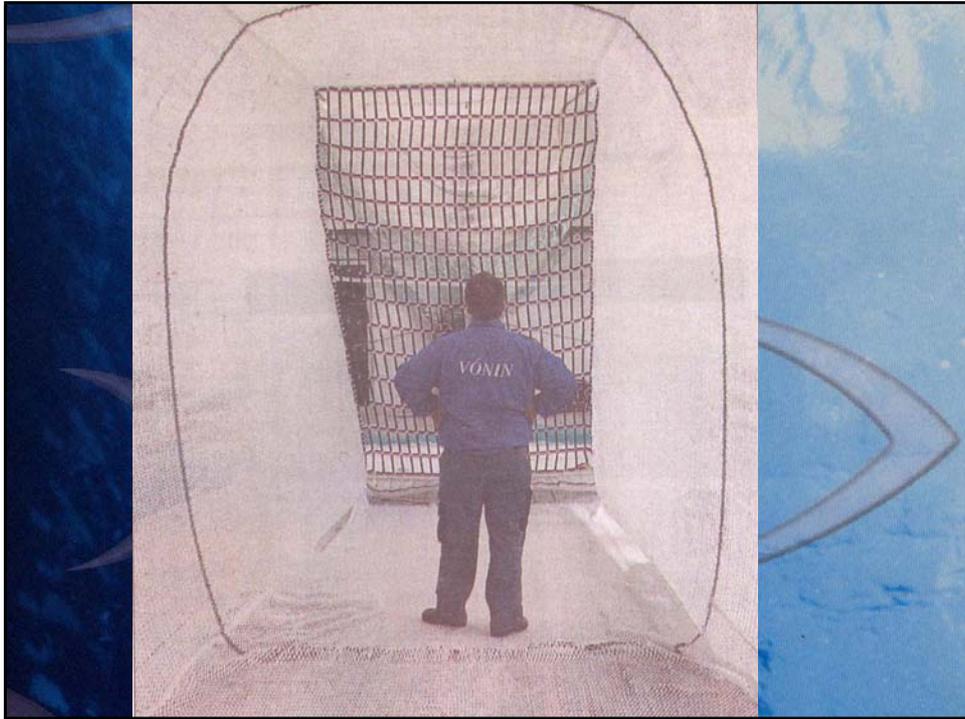




## Selectivity

- Grids tested in pelagic fisheries for release of by-catch of cod, saithe & haddock
- Losses of target species with large catches
- High mortality of escaping fish
- Handling problems
- Faeroese flexi-grid system shows promise



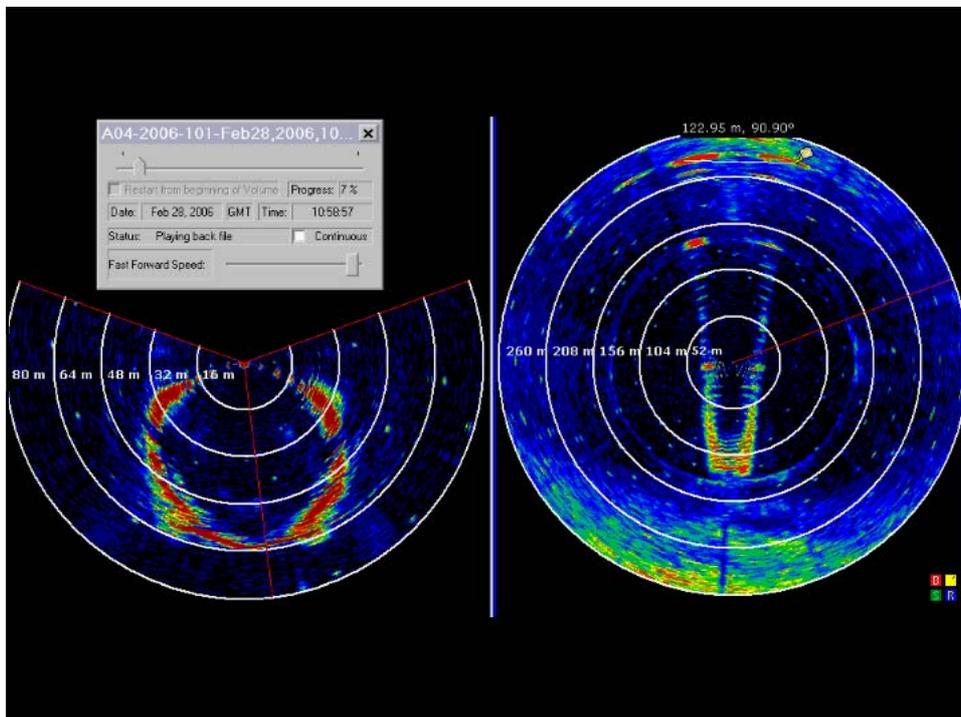
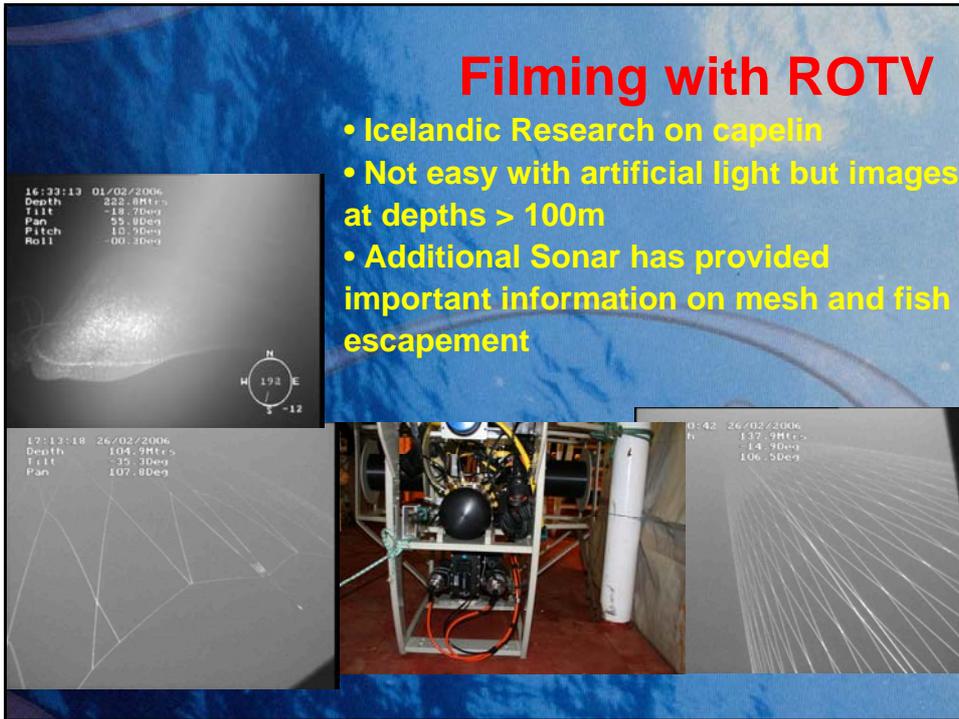


## Meshing & Escapement

- Meshing & forced escapement
- Extent difficult to quantify
- Only limited studies

## Filming with ROTV

- Icelandic Research on capelin
- Not easy with artificial light but images at depths > 100m
- Additional Sonar has provided important information on mesh and fish escapement



## Conclusions

- Escapement in some pelagic fisheries may not be desirable and hence the proposal for a maximum mesh size
- From a market/management perspective this may not be desirable and lead to high-grading/discarding
- Further investigations are needed to look at ways of improving size selectivity..
- Simple increases in mesh size or square mesh do not seem ideally suited to pelagic trawls due to high escape mortality

## Conclusions

- Selectivity devices such as rigid or semi-rigid grids have potential but need further testing under commercial conditions
- Survival experiments should be conducted on pelagic trawl fisheries.
- Research on behaviour of target and non-target species should be carried out.
- Acoustic techniques developed seem to have potential in this respect
- Novel solutions such as self-sampling or trial tows may be an alternative but required co-operation at a fleet level