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Mr Reine J. Johansson
Baltic Sea RAC
H.C. Andersens Boulevard 37
1553 Copenhagen V
Denmark

Subject: Consultation on Fishing Opportunities for 2010

Dear Mr Johansson,

Thank you for your letter of 31 July regarding the Baltic Sea RAC response to the Commission's Consultation on Fishing Opportunities for 2010. We welcome the comments made by the BSRAC. However, I would like to take this opportunity to review a few aspects on which our points of view may differ somewhat.

Let me begin with what BSRAC refers to as the "gloomy picture" which the Commission paints of the state of fish resources. The Commission's communication presents a review of the status of European stocks according to scientific advice without differentiating between fisheries or stocks, as the document should reflect the Europe-wide reality. It concludes that around four-fifths of stocks remain outside safe biological limits. It is regrettable that most stocks are in a poor state, but it is an undisputable fact which should rightly be highlighted.

I am extremely surprised at the recurrent BSRAC statement that *"for many stocks there is no assessment because there is no need for deeper knowledge. There is no obvious management problem so it makes no sense to spend valuable scientific effort on these stocks."* For many European stocks there are no scientific assessments because there are no accurate fisheries data. It is crucial that the industry, as the main provider of data, realises the implications of poor fisheries data and the consequences for the scientific advice provided, and that it takes responsibility for improving this situation. Furthermore, knowledge of the status of all stocks is fundamental to fisheries management, particularly in the context of ecosystems and in the face of a changing environment. I am also particularly disappointed to see the limited scope which the BSRAC appears to see for the way forward, namely: *"to concentrate scientific effort on the economically most important stocks and the ones with obvious management problems."* The Commission cannot support this position.

The Commission realised that economic considerations should be included in the annual communication on fishing opportunities. This is why a specific section was added in this year's communication (section 3 – fisheries performance). Nevertheless, the Commission

agrees with the BSRAC that the analysis should be further developed in future communications.

As the BSRAC states, fishing effort is intrinsically linked to fishing mortality. A reduction in fishing mortality may be necessary in many stocks to avoid overexploitation, even if the stocks are within safe biological limits, since these limits are not management objectives but management action triggers. The associated reduction in fishing effort is a necessary measure that will not reduce the possibility of landing the allowable amount, but will deter IUU and reduce discards, while stimulating a reduction in overcapacity.

The Commission's intention in managing discards is ultimately to reduce the amount of unwanted catch. The Commission refers to discard rates in order to reassure the industry that the objective is not to limit fishing, but rather to limit its impact on unwanted species and sizes. In other words, the main goal is to reduce the quantity of unwanted catch – ideally by changing the discard rate, i.e. making fisheries as selective as possible. In parallel, as the BSRAC recognises, a reduction in fishing effort will lower the quantities of unwanted catch, but will not alter discard rates. For that to happen, a change in fishing practice is necessary, and this is why the Commission supports improvements in any fisheries exploitation pattern.

In relation to Annex II, I welcome the support of the BSRAC. Regarding the stocks for which there is no scientific advice (category 11) and for which the TACs have not been fully utilised, the Commission does not assume that a stock is in trouble when it proposes to reduce a TAC due to underutilisation. The Commission's objective is to prevent an expansion of the fishery in respect of a stock about which little is known, and thus where an increase in fishing pressure may not be sustainable.

In conclusion, I regret the few discrepancies of view that remain between us regarding basic tools and concepts in fisheries management. I hope that this letter will help bridge that gap and I very much look forward to future dialogue and co-operation with the BSRAC.

Yours sincerely,



Fokion Fotiadis