

The North Sea Regional Advisory Council

NSRAC Secretariat
Woodhill House
Westburn Road
Aberdeen AB16 5GB
Scotland



NSRAC

21st December, 2012

Ms Lowri Evans
Director General – DG Mare
European Commission
B-1049
Brussels
Belgium

Dear Ms Evans,

Management of *Nephrops* Functional Units in the North Sea

Thank you for your letter of 3rd October in response to the NSRAC letter on the management of *Nephrops* functional units in the North Sea.

We appreciate your very complimentary remarks on the work being done on the development of the management plan for *Nephrops*.

As part of that development we are now making very good progress towards developing a rebuilding plan for the Farne Deep; the most vulnerable functional unit in the North Sea. We have consulted fishers and other stakeholders on a number of measures and are proposing an “of which no more than” approach as the best solution to the current problems in that area in the absence of alternative viable approaches. We have paid particular attention to the problem of allocating shares in the catch for that fishery. We aim to arrive at a solution that will achieve equity for all those vessels that fish the Farne Deep, recognising the particular problems faced by those who are limited to fishing there. We are hoping to complete the rebuilding plan for the Farne Deep in the next few months. We are also planning to develop trigger mechanisms for identifying other vulnerable functional units through a study of the *Nephrops* fishery on the Fladen Ground.

You mention your aim to develop a mixed-fishery management plan for the North Sea. Of course, in our draft management plan for *Nephrops* we have already

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emphasised the importance of a mixed fishery approach. Many vessels catch *Nephrops* along with other species like plaice, cod, whiting or haddock. Even where *Nephrops* is the main target, a significant income may be obtained from the capture of whitefish species. Days at sea restrictions, together with other measures, have now greatly restricted the range of fishing opportunities for fishers and disrupted their fishing patterns. At our port meetings fishers have repeatedly pointed out to us that it is now more difficult to pursue a seasonal pattern of fishing, moving from one species to another in the traditional way. A mixed fishery management regime that respects these traditional patterns and recognises that vessels simply catch what is there at the time has much to recommend it. You will appreciate, however, that a mixed fishery approach will be difficult to achieve. It will involve removal of some of the management measures currently in place, and the development of a completely new paradigm for fisheries management. There will be many obstacles placed in the way of achieving a mixed fishery plan.

The NSRAC has already been discussing mixed fishery issues with ICES and other scientists. Although we acknowledge that there are difficulties standing in our way we are hopeful that these can be resolved – especially if dialogue between scientists and the fishing sector can be maintained. Indeed, that is the most important point we wish to make to you. The work we have done in developing a management plan for *Nephrops* would not have been possible without the advice we have received from scientists, fishers and other participants. Development of a mixed fisheries approach will depend on strong cooperation between the NSRAC, scientists and fishery managers.

Yours sincerely,



Niels Wichmann
Chairman

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