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

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Dealing with turbot and other by-catch stocks

Dear Director General Evans,

I am writing to draw your attention to concerns expressed within the NSRAC over the imposition of TACs for by-catch species like turbot and also the more general issue of ‘choking’ species (species with small quotas that have the ability to close a fishery once the quota has been filled).

A TAC and quota system has been in place since 1998 for several fish of the lesser fish species including turbot (jointly with brill), dab/flounder, and lemon sole. TACs were originally allocated to member states on the basis of their recorded landings over a recent reference period. Most of these stocks have now been categorised by ICES as Data Limited Stocks. For these stocks TACs are set according to the precautionary principle. For turbot a stock assessment model was developed in 2012, which is being applied for the first time in 2013. The last published ICES advice (2013) said that catches of turbot should not be more than 2978t and brill no more than 2727 tonnes. However, ICES have added in advice that turbot is mainly a by-catch species in fisheries for plaice and sole and it was suggested that TACs might not be appropriate as a management tool for such species.

Multi-annual Management Plans have been suggested by the Commission as the main vehicle for future fisheries management at the regional seas level. Consideration of mixed fisheries and multi-species interactions are central to a reformed Common Fisheries Policy, with achieving MSY as the principal objective. There is a need to examine how this MSY state might be achieved in the mixed fisheries of the North Sea, especially with landings obligations imposed. There is a particular need to decide how best to handle species that might become a “choking” species like turbot. If a limited TAC is set for by-catch species then the exhaustion of a TAC for any minor stock could threaten closure of the whole fishery, leaving thousands of tonnes of quotas of more important stocks uncaught. Species like

turbot are explicit candidates for management by means of a mixed fisheries plan. Management of such species by setting individual TACs, especially when data are limited, might not be the right approach.

It will be difficult to manage the whole range of TACs that are currently imposed in the presence of a discard ban. The setting of TACs for by-catch species, especially in the absence of sound scientific data, is likely to result in management mayhem. With the imposition of an obligation to land all catches of key regulated species there is a need to engage, as a matter of priority, in the development of mixed fishery plans for the demersal fisheries of the North Sea. The NSRAC recognises from its discussions with ICES scientists that it will take some time to develop the necessary scientific underpinnings, but dialogue on such plans must begin now, in anticipation of the proposed discard ban.

It is already clear from the draft text on CFP Reform that the co-legislators foresee some of the difficulties associated with achieving MSY within the context of a discard ban and a move to management decisions based on mixed fishery and multi species advice. The NSRAC has begun thinking about what these changes will mean in terms of practical fisheries and quota management.

The NSRAC has previously called for greater discussion between the Commission, scientists and the Regional Advisory Councils on ways of managing the mixed fisheries. There is now an especially urgent need to consider how to deal with potential “choking” species against a background of the imposition of stronger landings obligations. This letter from the North Sea RAC is intended to start those discussions.

Yours sincerely,



Niels Wichamnn
Executive Committee Chairman