

**To:** NSAC Demersal Working Group

**From:** VisNed

**Subject:** Plaice minimum conservation reference size

**Date:** 2-7-2019

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For plaice (*Pleuronectes platessa*) a minimum conservation reference size (MCRS) of 27 cm is in place (Regulation 850/98). NB: also in the new TM the MCRS of plaice is 27 cm.

The Netherlands are planning to request the European Commission to decrease this MCR in the ICES areas IVb, IVc (Central and Southern North Sea respectively) and IIIa (Skagerrak) to 25 cm for the BT1 and BT2 métiers. VisNed would like to discuss this request in advance with the NSAC Demersal Working Group to draft an advice.

### Arguments

Two arguments have been made in the past in favour of having a 27 cm MCRS for plaice. The first was protecting the market, expecting a decline in prices once smaller plaice is made available for human consumption. The second argument being a precautionary one for keeping the plaice stock healthy.

The market protection argument is one that was advocated by the PO's themselves. The implementation of the Landing Obligation and changing market circumstances are reasons this argument doesn't carry as much weight as it once used to. To prevent a targeted fishery for the 25 – 27 cm length class the PO's can impose binding measures on their members.

The second argument is one that also seems caught up by reality as the plaice stock in these areas has been increasing for years and is developing positively. This is supported by the latest [ICES Advice on fishing opportunities, catch and effort](#), published on 28 June 2019. On top of that the TAC's aren't met by a long stretch because of insufficient capacity.

A relatively large part of the undersized bycatch is under 27 cm as the fact & figures below show. The argument can be made that either with or without an exemption for plaice under the Landing Obligation it is food waste not to land this length class for human consumption since multiple market parties have expressed their interest.

### Facts & figures

In the EMFF project Best Practices II, from 2016 to 2018, all plaice discards collected on thirteen BT2 discard trips, during which the requirements of the landing obligation in its fully implemented form were carried out - were sorted into six length classes spanning 2 cm each, plus a lower and an upper class. One of the goals of the project was to determine the proportion of plaice discards in the 25 – 27 cm length class. The discard trips showed a 20.8% contribution of plaice discards within this length class.

This fairly closely matched the 19% result of an analysis of the plaice data from the DCF discards self-sampling programme for this métier by Wageningen Marine Research (WMR).

The results based on the discard trips were slightly higher than the self-sampling programme as expected because the smallest specimens were not collected. Since the self-sampling programme also covers the other métiers, results could be raised to the Netherlands fleet level. The resulting estimate of plaice discards in the 25 – 27 cm length class in the entire Dutch fleet was 23.48% by weight (6.500 metric tonnes).

In 2015 WMR estimated that discards for all quota species, if selectivity does not improve, for all métiers are 50.000 tonnes annually. Almost 90% of these are attributed to beam trawls. Because of uncertainties, factor 3 is applied by WMR to calculate a bandwidth. This means the total amount of discards can be 3 times higher or 3 times lower than 50.000 tonnes. When taking the 50.000 tonnes into account this means 23.000 tonnes of this is made up of plaice. Using the 20,8% of the BP II project the 25-27 cm class accounts for 4.5 million kilogrammes.

Compared to the 2019 ICES advice this estimation seems low. In that advice the unwanted catches are estimated at 47.769 tonnes. The majority of this being caught by Dutch vessels. Applying the BP II percentage of 20,8% this means close to 10 million kilogrammes 'Plaice 5' and applying the DCF percentage of 19% this means circa 9 million kilogrammes

Reducing MCRS of Plaice to 25 cm will result in abt 10 mln kilos of healthy whitefish with a market value becoming available for human consumption, instead of being landed at a cost for low value fishmeal.

### **Questions for the Working Group**

Does the working group agree with the above-mentioned reasoning for lowering the minimum conservation reference size for plaice in areas IVb, IVc and IIIa?

1. If not, why not?
2. If agreed, are there additions and/or suggestions to be made?