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Director General  
DG Fisheries and Maritime Affairs  
DG MARE  
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22<sup>nd</sup> of July 2010

**Subject: NWW RAC Advice on Spurdog Discard Reduction Plan**

Dear Director General Mrs. Evans

We have had to accept that the current ICES' advice is that Spur-dog stocks are currently depleted and that management measures to rebuild populations to safe biological levels are a legitimate priority for fisheries managers and ministers.

However, we think that the measures that have been adopted are neither appropriate nor fit for purpose, if the objective is to reduce fishing mortality on Spur-dog to give stocks an opportunity to recover.

Therefore, whilst we share with you the aim of reducing fishing pressure on Spur-dog, and can even understand the short term pressures which led the Council of ministers to adopt an essentially cosmetic measure in the form of a zero TAC, we are frustrated that the concrete measures put in place will do nothing to rebuild Spur-dog populations and will in practice retard the development of a meaningful conservation policy for Spur-dog.

The basis for these comments lies in our practical experience and knowledge of the fisheries involved. The salient points are:

- Spur-dog are found in shoals but these are uneven and generally unpredictable in their distribution for most of the year
- As a result, although not targeting Spur-dog, on occasion gill-netters targeting species such as Hake and Pollack can on occasion catch substantial amounts of dogfish
- A similar pattern can be seen when trawlers hit unpredictable shoals of Spur-dog
- This pattern of catches is reflected in the landings statistics (Cornish Fish Producers Organisation from the UK figures by fleet sector attached for information) where generally very low levels of unavoidable by-catch are interrupted occasionally by substantial catches

All this demonstrates that a zero TAC, albeit with a 10% by-catch tonnage per member state, is an inadequate management response to the problems confronting Spur-dog.

The result of an in effect zero TAC provision can be described quite precisely:

- A significant discard problem where previously there was none
- No reduction in fishing mortality on Spur-dog
- An alienated and frustrated fishing industry obliged to discard a not completely insignificant part of their earnings for no comprehensible reason

### **Alternative**

Clearly, this is an unacceptable position for all concerned. Stocks of a vulnerable species remain under pressure; fisheries managers see their measures fail to deliver a reduction in mortality that will be a prerequisite for improvement in the stock, ministers remain under pressure from environmental organizations to “do something”; fishermen can only shake their heads in despair at yet another irrationality in the management system.

Away from the immediate pressure of the Council and the year end negotiations, we believe that it is possible to design an approach that at least has the potential to deliver recovery Spurdog populations by effecting a reduction in fishing mortality

### **Proposal**

We propose the following:

- No targeted Spur-dog fisheries
- Replacement of the zero TAC limit by a monitoring programme to minimize by-catch of dogfish where possible and maximize return of live incidental by-catch
- Retention of the 100cm maximum landing size, if felt necessary
- Release and recording of data on numbers, size and position of live Spur-dog (verified by observer coverage if necessary)
- Continual monitoring of by-catch rates and if increasing significantly immediate remedial action to be taken

Benefits:

- Reduce discarding of dead fish
- Maximize return of live fish
- Improve scientific data or understanding of these species as basis for the design of effective Spur-dog avoidance strategies
- Encourage fishing industry collaboration or partnership to trial and test technical, spatial and temporal means of reducing dogfish by-catch
- Build in step wise fashion an effective rather than cosmetic approach

This is an issue which requires immediate resolution to avoid any further unnecessary discarding and alienation of the fishing industry. Therefore we would suggest an urgent meeting of Commission policy officials and scientific advisors to develop a practicable management regime as soon as possible.

I trust that you will appreciate the genuine nature of these proposals and assist us in addressing this issue as a matter of urgency.

Yours faithfully,

Sam Lambourn  
NWWRAC Chairman