



NWWRAC Opinion in response to Commission non-paper
“Separating TAC Areas for Plaice in VIId and in VIle”

July 2010

The NWWRAC takes note of the Commission proposals for Channel Plaice stocks VIId and VIle and makes the following observations¹:

Whereas:

- a. The Commission non-paper states that joint-stock management has “engendered certain disadvantages...” and that “it is impossible to provide for different management responses...”
- b. ICES assessments for these two stocks are not reliable indicators of absolute status, being described by STECF as “not known precisely”.
- c. ICES noted the difficulties of individual stock assessment caused by mixing, with significant amounts (15%) of first quarter catches in VIle originating in VIId. Significant amounts of IVC Plaice are caught in VIId throughout the year. In such open-mixing stock populations it is not possible to undertake reliable closed-area stock assessments.

The NWWRAC:

- a. Notes the Commission concerns about joint-stock management and the apparent difficulties this presents.
- b. Notes, however, that clear objectives for both stocks are absent from the Commission non-paper.

¹ Following article 28 of the NWWRAC general rules and procedures, a dissenting opinion from Rederscentrale has been recorded and stipulated as follows:

“The Rederscentrale agrees with the ICES response referring to the 2010 benchmark. The Rederscentrale supports the implication made by ICES that a two-stock management is the better approach and agrees with the findings of ICES that the TACs should be separated. It is the Rederscentrale’s view that more sustainable management can be achieved if VIId and VIle plaice obtains separate TACs”



- c. Notes the ICES and STECF descriptions of uncertainty in the stock assessments, the widespread mixing of the stocks and the uncertainties in the stock structure with important migration between VIId,e and IVc areas.

As illustration, the ICES advice for plaice in division VIId indicates “Tagging studies show spawning migrations from area VIIe and IV occur during 1st quarter of the year. Based on these published tagging results and previous studies, the catch at age is adjusted in this year’s assessment. It is assumed that the 1st quarter plaice catch in VIId consists of 50% fish coming from North Sea to spawn in VIId and 15% fish from VIIe. »

The same statement is mentioned in VIIe advice “Tagging studies show spawning migrations from Division VIId to VIIe during the 1st quarter of the year. It is assumed that 15% of the 1st quarter plaice catch in Division VIId consists of fish from VIIe. » Notes the additional (June 2010) ICES advice in response to DGMARE request: “Plaice in the Channel (VIId and VIIe) show seasonal migrations between spawning and feeding grounds and plaice catches in one area can consist of a mix of plaice from up to 3 different stocks (North Sea, Eastern and Western Channel populations). This raises problems in identifying the stock assignment of the catches. The ICES advice for many years has based on two stock units and the 2010 benchmark (ICES, 2010) confirmed that the better approach is to maintain a two-stock approach as the basis for management advice and thereby implying a two-stock management as the better approach.

- d. Considers that this response only re-states ICES advice of many years that, for the reasons of uncertainty in their assessments and the levels of mixing has been overturned by managers for 27 years.
- e. Remembers that responsibility and management of TACs is a matter of exclusive competence for Member States.
- f. Remembers also that allocation questions are addressed as matters of exclusive competence for Member States.
- g. Underlines that others regulations which limit the activity of the vessels in the concerned areas may have an effect on the state of plaice stocks: cod management plan in North sea and Eastern Channel (regulation CE 1342/2008), plaice and sole management plan in the North sea (regulation (CE) 676/2007), Western Channel sole management plan (regulation (CE) 509/2007). The effects of those plans on plaice stocks haven’t been taken into consideration. As those plans imply a regulated utilisation of gears which targets plaice or catches it as by-catches, it should have a positive effect on the stocks.



- h. Notes that management of the combined VIId,e TAC has prevailed for 27 years and believes that separating TAC areas for Plaice in VIId and VIIe now would induce unpredictable evolution in stock biology that might not be improvement and might be less sustainable.
- i. Believes that Member States involved in these fisheries are best placed to manage the TAC to achieve objectives of sustainability.
- j. Concludes that there is no proven merit that would justify the potential risks of changing to separate TAC for VIId and VIIe Plaice. The uncertainties in the stock assessments might not be overcome and there is no evidence that the stocks would achieve sustainability any better or with any more certainty through separate TAC management controls than through technical and other measures introduced by Member States.
- k. Urges that these other Member States' measures should be assessed and quantified by ICES/ STECF to show their efficacy and beneficial impacts on the separate stocks.

---ENDS---