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SWW AC recommendations, Reflections on work to be carried out as part of the preliminary analysis of the management plan for the South Western Waters

This paper aims to present the SWW AC's reflections and recommendations on the work organised by the European Commission and STECF regarding the multiannual plan for the South Western Waters. The SWW AC recalls that it intends to contribute actively to the preliminary work towards a multiannual plan for benthic and demersal species.

1. Fundamental points / objectives for multiannual plans for the SWW AC

For the SWW AC, the main advantages of this new tool are that a multiannual plan helps to reduce uncertainty and should prevent short-term factors from continuously influencing decision making. Visibility and, if possible, stability in the long term make this tool beneficial for all stakeholders. In addition, it must achieve the biological and environmental objectives of the CFP and provide optimal support for the landing obligation. Securing sustainable fishing opportunities in the long term is the primary objective of the fishermen organizations.
The following points should be taken into account for the multiannual management plan (MAP). The SWW MAP must restore the harvested fish stocks by "achieving maximum sustainable yield exploitation rates that will restore and maintain populations of harvested species above levels which can produce the maximum sustainable yield"(art. 2.2 of CFP). The plan must also ensure that all exploited stocks are managed in line with the CFP objectives including conservation measures if the stocks levels can't reach the objectives fixed by the plan. For the SWW AC's NGOs, to achieve this objective, exploitation ranges in the SWW MAP must be set below F_{MSY} to meet the objectives of the CFP and the UN Fish Stock agreement.
Finally, the SWW MAP needs to include the integration of the ecosystem based approach to fisheries management (reduce the negative impacts) and to contribute to achieving Good Environmental Status under the Marine Strategy Framework Directive.

2. SWW AC concerns regarding the work in progress

A Plan too general would be disappointing

SWW AC has doubts in respect of the work under way in the other regions. Indeed, the Baltic plan is very general as it is and does not seem to fulfil the objectives of the CFP as well as objectives of predictability and stability. The management of stocks by mortality ranges will always be subject to political negotiations that cannot always guarantee these objectives.
The question of straddling stocks can never explicitly be determined and the scope of multiannual plans cannot fully conform to stock definition contours. It is therefore important to take account of the relationships required in the formalization of measures for a single stock in case it is managed under two separated management plans.

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Scientific approach insufficiently comprehensive

The approach proposed at present does not seem to be sufficiently comprehensive. Indeed, according to the CFP, a multiannual plan must be based on scientific, technical and economic input and include scientific, technical and economic objectives. In addition, the likely economic and social impact of measures must be taken into account before being included in multiannual plans (Article 9 CFP). Although this was requested to and conducted by STECF, it could and should be further analyzed. In that sense, a study centered on fishery resources might seem simplistic; it should also take into account economic and social viability. The scenarios currently envisaged by STECF are satisfactory only in as far as achieving political objectives regarding fishery resources.

This lack of comprehensiveness is also true regarding the selectivity objectives. It would have been much preferred to define these objectives throughout the MAP, nor inside the new technical measures framework, as it is supposed to be done. This situation could lead to some inconsistency in decision making. It is also important to consider that MSY values for stocks might change because of the landing obligation, which will change the exploitation pattern. These issues should be considered for further clarity and objectivity in decision making.

Finally, some fleets target data limited stocks which strongly influences management in some areas such as the Bay of Biscay or the Portuguese coast. It will require additional efforts to develop measures for data limited stocks. The lack of scientific knowledge shouldn't limit the management of these stocks and the multiannual plan should define management rules accordingly. To improve the management of these stocks, the scientific diagnostic for such stocks therefore needs to be improved to allow for the achievement of the CFP Art.2.2 that requires that all harvested species achieve biomass levels above those able to produce the MSY.

Difficulty of including implementation of the fish landing obligation

The landing obligation will result in a move from management by landings to management by catches. This aspect should therefore not only be seen in terms of the landing obligation, but also in terms of consequences for management. Multiannual plans must take over from discard plans and must therefore cover all components they contain by broadening the spectrum of possible measures.

As pelagic species are by-catches of demersal fisheries, the impact of activities on the management of pelagic stocks should be integrated, even if it represents a low rate of mortality.

No improvement in variability of fishing opportunities using only mortality ranges

The flexibility allowed by mortality ranges can lead to substantial variability of fishing opportunities. Assessing the impact of management of stocks using this single tool is not acceptable. Considering the achievement of MSY as the main objective is necessary but does

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not seem enough. A broad-based multispecies model taking into account the dynamics of stocks and fleets might be difficult currently. Yet it seems that certain assemblages ages of species need to be considered (catch composition such as hake/lobster interactions or hake/sole ...). Stock dynamics can be influenced by one-off factors that may influence the development of the biomass and/or bearable fishing pressure: recruitment pulse that must be included in the fixed TAC rules.

3. Recommendations for future work

Close involvement of ACs in Scientific and Institutions work

For a comprehensive and rewarding reflection to be conducted, the stakeholders concerned must be significantly involved in the process. Articles 3 and 6 of the CFP state that there must be participation on Advisory Councils through consultations or recommendations from conception to implementation of measures.

Predictability / stability

The aim of stakeholders is to improve predictability in terms of setting fishing opportunities and if possible contributing to their stability. It is important to consider and initiate studies on measures to complement mortality ranges right away. In the absence of such measures (exploitation rule, economic and/or social safeguard measures, limitation measures regarding variability in fishing opportunities etc.), it is likely that the expected gain in terms of visibility of fishing opportunities be reduced or absent. Other assessments, different from that of the management through mortality ranges, and the inclusion of exploitation rules in impact studies of scenarios is required.

The work carried out will as far as possible have to translate options tested and their consequences in terms of fishing opportunities.

Comprehensive scientific approach needed for a potentially better structured multiannual plan

It is unfortunate that scientific work should be segmented solely for regulatory purposes. A review of the existing situation is paramount. Scientific consistency is necessary for all objectives to be studied and analysed. The initial Commission proposal of the Baltic plan was not satisfactory in view of the objectives described above. Efforts should be made to study technical interactions between fisheries, interactions between stocks through catch compositions, to evaluate the impact of different scenarios (other than those proposed by STECF during the working groups for the North Sea and the South Western waters) on fishing opportunities and to take into account social and economic considerations such as the resilience of fisheries evaluated in the different scenarios. This would suppose to deeply reinforce the data quality process overall, in order to allow the use of new or better economic

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and social sustainability models.

Pursue a multispecies approach

The multispecies approach proposed in the scenarios through the reconciliation of the fishing mortalities of the different stocks should be pursued with a view to improve it. Combined management of stocks will undoubtedly help mixed fisheries to implement the landing obligation and the ecosystem approach. The mechanism could be investigated applying mortality reductions depending on technical interactions.