



European Commission
Directorate-General Fisheries
c/o Mr Fokion Fotiadis
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Date: 20 October 2008
Our reference: 0809PRAC03/AC
Subject: Recommendation on the removal of the Douglas Bank closure

Dear Mr Fotiadis,

The Pelagic RAC wishes to express that it unanimously endorses the attached proposal prepared by the Northern Irish fisheries department (DARD) and the Irish industry, on the removal of the Douglas Bank herring closure.

If you have any questions, please contact the secretariat. Looking forward to your response,

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Aukje Coers', with a long horizontal stroke extending to the right.

Aukje Coers
Pelagic RAC secretariat

c.c. Ms Isabelle Viallon, Mr Edward-John Spencer, Mr Andrew Thompson (by e-mail)

Annex 1: Removal of the Douglas Bank herring closure in the Irish Sea

A proposal by:

Department of Agriculture & Rural Development, N. Ireland, UK
Northern Ireland Fish Producers Organisation
Anglo North-Irish Fish Producers Organisation

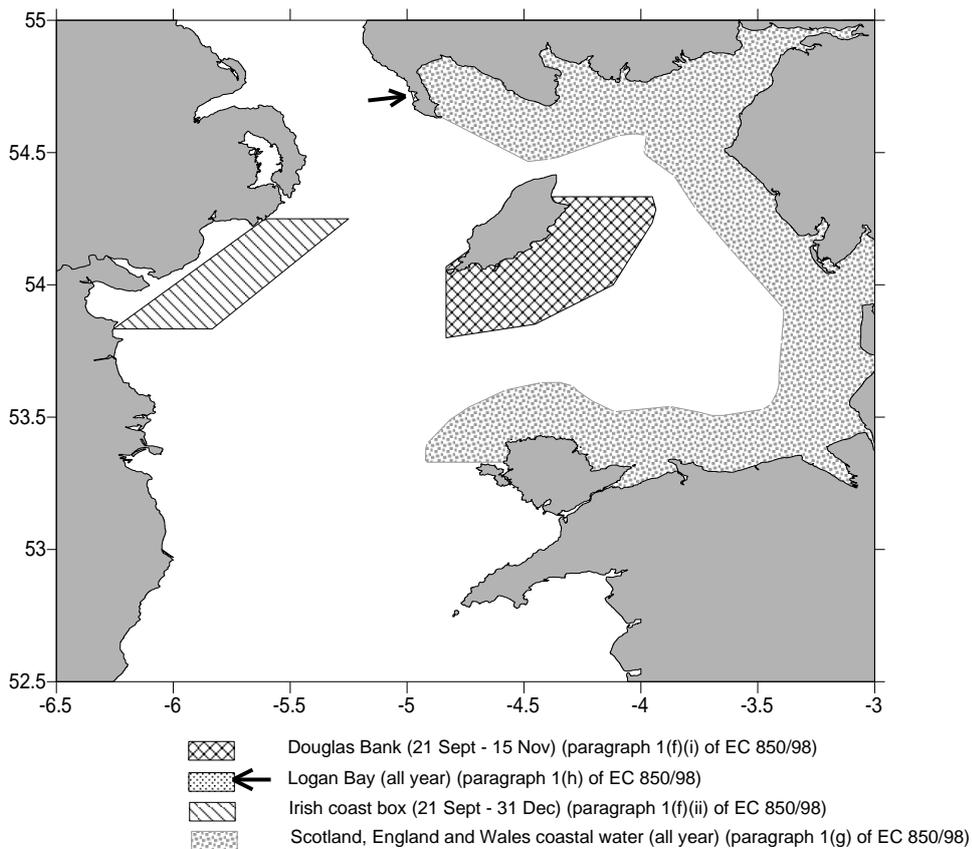
18 September 2008

Background

The Douglas Bank herring closed area was introduced in Council Regulation EC 1796/94 (18 July 1994), as an amendment to Council Regulation EEC 3094/86, to protect aggregations of spawning herring that gather off the south east coast of the Isle of Man during September and December. This protection was considered necessary to promote recovery in Irish Sea herring stocks.

The current closed area (Appendix 1) is defined in Council Regulation (EC) 850/98 Article 20(1) (f) (as amended) and under the Regulation the retention on board of herring caught within the closed area is prohibited from 21 September to 15 November.

Figure 1. Position and geographical area of herring closures within the Irish Sea as defined by Council Regulation (EC) No 850/98, amended by EC 2723/1999.



Scientific / stock aspects

An evaluation of closed areas including Irish Sea herring closed areas was carried out by a Subgroup on Management of Stocks (SGMOS-07-03), of the STECF, in 2007.

On the Douglas Bank closure the SGMOS commented that this was a closure to protect spawning aggregations from overfishing and therefore high fishing mortality in a short period of time. It concluded that the closure was a fisheries management measure rather than a closure imposed on a biological basis for stock enhancement purposes. The closures were justifiable at the time as other means of controlling overall fishing mortality were not available.

As a result of the Douglas Bank closure, fishermen were forced to fish outside the closed area where adult and juvenile herring are found in proximity and that this resulted in less productive fishing, an extended fishing season and this consequently results in increased mortality on smaller fish.

For the Irish Sea herring closures the SGMOS-07-03 considered it unlikely that the closures were particularly important in overall stock management. More effective management tools are now available to fisheries managers in the Irish Sea, such as VMS and tighter controls on landings and sales data through Buyers and Sellers legislation.

SGMOS concluded that provided stocks are not overfished as defined by ICES, and that fisheries managers set TACs in line with management plans for sustainable stocks, and that there is effective control on fishing mortality the closures could be removed. SGMOS suggested that before any removal or alteration of a spawning closure could be considered, the fishing industry, scientists and managers should collaborate in drawing up effective plans for minimising the risks of overharvesting of individual spawning populations.

Economic aspects

The fishery also provides a welcome alternative to Nephrops upon which Irish Sea fishermen have become heavily reliant. Whilst the output from the fishery is capped by the TAC, the lifting of the closure would permit higher value fish to be taken more efficiently. This is an important consideration at a time when the very high price of fuel makes it essential that returns from each fishing trip are maximised.

Social aspects

The Irish Sea herring fishery is relatively small but is vital to support two pelagic trawlers fishing as a pair team and a processing plant operating from County Down, Northern Ireland and providing scarce employment in a rural area.

Proposals

SGMOS recommended that the closure could be removed provided :

- the fishery is not overfished and TAC is set at a sustainable level within the context of stock management plans; and
- there is effective control on fishing mortality.

Ensuring a sustainable stock

Although Irish Sea herring stock assessment is not considered accurate and the main factors contributing to the state of the stock are “unknown”, the overall stock biomass is thought to

have been relatively stable over the last number of years. The current TAC is therefore considered sustainable provided fishing effort does not increase.

Effective control of fishing effort

The small number of boats prosecuting the fishery, (2 vessels operating as a pair trawl team) means that very tight control over fishing effort and mortality can be exerted, through Vessel Monitoring System and Registration of Buyers and Sellers system records. In addition since the fishing season is relatively small, an observer and sampling scheme will be introduced to monitor catch and assess the impact of the fishery.

Additional controls to monitor and evaluate the impact of removal

The following measures would provide assurance to the Commission that there would be little risk to the herring stock from removing the closure.

- More Information on the level of discards of juvenile and adult herring in the catches of demersal fisheries operating in the herring closed areas

(This is being provided through the Irish Sea Data Enhancement Project. Observed trips and self sampling is increasing and this data is being gathered.)

- Acoustic surveys to be carried out to compare spawning aggregations pre, during and post closure aggregations.

(This has already begun through the Agri-iFood and Biosciences Institute NI and this survey work will provide valuable data to evaluate the impact of removing the closure.)

- An enhanced programme of scientific observer coverage would be carried out during the first two years following removal of the closure.

(This would be designed to monitor the evolution of the catch in the formerly closed area)

- The removal of the closure should be reviewed at least every 3-5 years

(A review should be carried out and monitoring requirements and protocols should be specified in order to permit the impact of the closure to be evaluated.)

Conclusions

Effective controls exist to control the catch and effort of the remaining pelagic vessels wishing to target this fishery and additional reassurance can be provided through gathering additional data and regular review of the impact of the removal of the closure.

Appendix 1

Current Douglas Bank closed area as defined in Council Regulation EC 850/98 as amended by EC 2723/1999

Article 20

Restrictions on fishing for herring

1. The retention on board of herring which are caught within the geographical areas and during the periods mentioned below shall be prohibited:

(f) (i) from 21 September to 15 November, within the part of ICES Division VIIa bounded by the coast of the Isle of Man and straight lines drawn consecutively between the following coordinates:

- latitude 54°20'00" N, longitude 04°25'05" W and latitude 54°20'00" N, longitude 03°57'02" W,
- latitude 54°20'00" N, longitude 03°57'02" W and latitude 54°17'05" N, longitude 03°56'08" W,
- latitude 54°17'05" N, longitude 03°56'08" W and latitude 54°14'06" N, longitude 03°57'05" W,
- latitude 54°14'06" N, longitude 03°57'05" W and latitude 54°00'00" N, longitude 04°07'05" W,
- latitude 54°00'00" N, longitude 04°07'05" W and latitude 53°51'05" N, longitude 04°27'08" W,
- latitude 53°51'05" N, longitude 04°27'08" W and latitude 53°48'00" N, longitude 04°50'00" W,
- latitude 53°48'05" N, longitude 04°50'00" W and latitude 54°04'05" N, longitude 04°50'00" W;