



Lowri Evans
Director General
DG MARE
European Commission

Dublin, 19 July 2011

Subject: Setting TACs for Data Deficient Stocks in North Western Waters

Dear DG Evans,

Our response to the Commission's Communication on TACs for 2012 makes it clear that we do not think that a blanket reduction for all stocks deemed to be "data poor" is a rational, equitable or justifiable approach. As member states in the Council of Ministers apparently share this view, it is clearly important to give further thought to how TACs should be set for those stocks which ICES has been unable to provide population estimates, before the Commission issues its proposals this autumn; bearing in mind that it has been suggested that TAC decisions for most western stocks should be made in November.

This letter provides the NWWRAC's advice on how this important issue should be approached.

Stocks without Population Estimates

Our dialogue with ICES scientists on this issue has given us a stronger understanding of the problem.

ICES may be unable to provide a full, quantitative "analytical" assessment for a variety of reasons.

These include:

1. Data poor stocks:
 - a. Absence of current discard information;
 - b. Absence of historic discards data;
 - c. Absence, or errors, in catch statistics;
 - d. A variety of other reasons.
2. Data Rich stocks which nevertheless are faced with inherent assessment modelling problems;
3. Sampling difficulties related to biology or stock distribution issues.



4. Stocks which are inherently uneconomic to sample (e.g. Pollack);
5. Stocks which should more sensibly be assessed on a 3 or 5 year cycle;
6. Stocks where there are conflicting signals within a single assessment area.

Whilst this is not an exhaustive list, it does highlight the inappropriateness of a blanket approach. The elements of a more satisfactory and balanced approach are outlined below.

Possible Principles underpinning TACs for “Data Deficient” Stocks

In making its proposals for TACs for “data poor” stocks, the NWWRAC advises that the Commission should take account of:

1. ICES Advice for 2012;
2. Current and historic fishing mortality trends (where available);
3. Current and historic Biomass trends;
4. Discard implications of TAC decisions: Current and projected discard Rates / Absolute levels of discards;
5. Other relevant available evidence; including:
 - a. Fisheries Science Partnership Project data;
 - b. Annual Industry Fisheries Reports (where present).
6. WSSD commitment to build depleted stocks to MSY level where possible;
7. Socio-economic consequences / appropriate TAC constraint;
8. The avoidance of perverse incentives.

I hope that you find these suggestions helpful.

Yours sincerely,

Sam Lambourn

Chairman of the North Western Waters RAC