

Recommendations

regarding a multi-annual plan for cod in the Baltic

- May 2007 -

At the BS RAC Executive Committee meeting on 22nd May 2007, the Executive Committee confirmed their consensus view expressed in the recommendations of 5th September 2006 (appended at the end of this document). Given the on-going revisions of the text of the proposed plan, the following additional recommendations and comments are submitted on behalf of the BS RAC Executive Committee:

- The lack of the words, “management” or “recovery” within the title of the proposed Regulation should not preclude the use of the European Fisheries Fund (EFF) to alleviate the social and economic impact of the plan on the fishing industry and ancillary services. The ability for Member States to use EFF money for this purpose should be clearly specified within the plan.
- A days-at-sea regime, applied in a transparent and effective way, has in previous recommendations been mentioned as the favoured effort limitation option. The members of the Demersal Working Group of the RAC expressed their satisfaction when they learned that the plan now operates with such a system and the Executive Committee shares that satisfaction.
- There should be a derogation for small scale inshore fleets that do not fish for cod during the summer ban.
- While the plan advocates reduced fishing effort, Article 9 provides an opportunity to gain more fishing days. This is in direct contradiction to the whole incentive of the plan and Article 9 must be deleted.
- Despite the unfortunate timing, the RAC can accept that an impact analysis on the social and economical consequences of the plan is made after the Council has adopted the multi-annual plan.

BS RAC Executive Committee Recommendations of 5 September 2006 regarding the European Commission's proposed management plan:

- To request an impact analysis on the social and economical consequences of the plan.
- To ask the Commission if there was any evidence that a problem with misreporting area of capture had been created with the division of the two Baltic cod stocks. If it has, the Working Group would reconsider the value of having two distinct stocks for management purposes.
- To seek opinion from the Commission as to whether Article 7 is redundant.
- To request that Article 8 (1)(b) shall include Subdivisions 28.2.
- To ask the Commission to initiate a study into what the capacity/resource balance should look like within the Baltic region, taking into account the points of view of Member State fishing industries and the members of the RAC.
- To change the 8% tolerance on logbook estimates to 10%.
- To include subdivision 28.2 in “Area B” when referring to the commencement of fishing activity for vessels with less than 100 kg of cod.
- To allow vessels to enter and exit ports with cod catches in excess of 100 kg.
- To increase the weight at which vessels are required to report to the authorities before landing from 100 to 300 kg.
- To request that the Commission present their analysis of “Inspection Benchmarks” to the Working either on a formal or informal basis.