

From the Seafish Discard Action Group Chairman
Mike Park

Commissioner Maria Damanaki
European Commissioner for Maritime Affairs and Fisheries
European Commission
B - 1049 Brussels

21st October 2011

Dear Commissioner Damanaki,

Proposing a means of improving the evidence base for managing discard reduction

The Discard Action Group (DAG) is a cross sector body within the UK fisheries sector. The UK Discard Action Group (DAG) has tried to take a coherent view of the issues raised by discarding and the means to minimise this wasteful practice. Four theme groups have been established looking, variously, at the legislative, gear technology, science and data, and marketing aspects of discard reduction. The group has agreed that, following the Commission's publication of proposed broad reforms to the CFP, a letter should be written to the Commission with suggestions as to how some of the detail could be fleshed out. These notes relate to the 'science and data' aspects.

DAG is a discussion forum not a representative body; it attempts to capitalise upon the overall expertise of its participants. In that context these notes combine several perspectives but should not be viewed as representative of the views of any individual participant.

It is clear from FAO and other sources that the levels of discarding in NE Atlantic fisheries generally are disproportionately high relative to similar areas elsewhere. It is also clear that lack of data on discarding rates can seriously compromise stock assessment and modeling and management.

The Commission's current plans to manage discarding by progressively banning the practice may also have impacts upon the quality of data related to fishing mortality.

We would like to make the following observations:

1. It seems that, as well as better data on discard levels, Member States also need urgently to build capacity in data generation in order to support the aims of other regulations, directives and national legislation. In the UK these include:
 - a. the Marine Strategy Framework Directive,
 - b. the Water Framework Directive,
 - c. the Habitats Directive (N2K),
 - d. the Data Collection Framework,
 - e. the various Marine Acts, and
 - f. commitments under the FAO Code of Practice on managing bycatch and discards.

2. Making enough observations to satisfy these requirements would almost certainly demand institutional capacity that is difficult to identify. Expanding conventional, publically funded capacity would be prohibitively expensive at the current time but we already have a huge fleet of potential sampling platforms in the fishing industry. So a sensible approach to these issues would be to start with a review of the suite of potential providers and users for the required data needs.
3. A 'supply-side' assessment should explore the opportunities and risks associated with fishing industry-generated quantitative and more qualitative observations. In the UK, the industry has already demonstrated competence in total catch sampling, video-based catch monitoring, the use of underwater video surveying of conservation features and their status, generating oceanographic data and making more general observations. However, it is necessary for scientists, EU institutions, governments and industry to agree and define the type of data to be collected – and the form in which it needs to be collected – for it to be usable for scientific purposes and practically collectable from the point of view of fishers.
4. Guided by the outcome of the review we expect that a number of initiatives will be taken predicated on the imperative need to identify and quantify discards and associated fishing-related mortality of marine species. In the first instance the European Commission and Parliament should consider, integrate and comply with the provisions of the FAO Guidelines on bycatch management and reduction of discards.
5. Priority should be given to work on currently unidentified or unquantified sources of fishing-induced mortality, including survival studies. This will be particularly important if moves to ban discarding lead to the introduction of novel gear selectivity devices as these may simply transform the problem of discard mortality into one of escape mortality.
6. Currently it would seem that the reformed CFP will only contain a landing obligation for certain listed species. These are not the only species for which data collection is crucial. It is of fundamental importance that data collection obligations extend to all species that are caught (targeted or as bycatch) and that are discarded.
7. Any framework for managing and reducing discards should consider how to incentivise best practice and the generation of data that will integrate and satisfy the FAO criteria relating to scale, accuracy and precision. There are risks associated with The Commission's current proposals for a progressive discard ban. For a landing obligation to work there would need to be a strong compliance/enforcement framework, especially if some species can continue to be discarded. If Member States robustly enforce a discard ban with electronic monitoring or high observer coverage, we expect there to be an increase in the amount and utility of data collection. This would also promote accountability of the fishing industry, which could be supported by the supply chain.
8. We urge that the development and delivery of a strategic approach to the reduction of discards and management of bycatch should involve the whole supply chain along with other stakeholders. Given the number of relevant initiatives on participatory research, joint industry:science data collection¹ and discard reduction currently being taken, we suggest that the approach outlined

¹ See for example the EU supported GAP project (www.gap1.eu); contract SI2.491885, Ref.FISH/2007/03 Lot1; and various EFF and nationally funded industry:science projects

above should be piloted in the UK. We believe that capitalising in this way on the investments already made by the UK seafood industry would deliver a wide range of benefits, many of which have already been identified as desirable in the CFP review process to date. These include building an eco-region basis for regionalisation; engaging fishers more directly than ever before in marine environmental management and the conservation of species and habitats; cost-effective and pragmatic strategies for discard reduction or elimination (except where species have a proven high survival rate); bycatch reduction and management; and continuing improvements in the levels of responsible behaviour and compliance with new regulatory demands.

I hope that you find these comments useful, I would be pleased to expand upon any points that require expansion or clarification.

Please note that the views expressed in this letter should not be taken to represent the UK Government position or thinking.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Mike Park', written in a cursive style.

Mike Park, Chairman

The Discard Action Group, which was formed in 2007, receives advice and contributions from:

Anglo North Irish Fish Producers' Organisation
Birds Eye Iglo Group
CEFAS
Co-operative Society Ltd
Cornish Fish Producer's Organisation
ClientEarth
Department of Agriculture and Rural Development NI (observer status)
Department for Environment, Food and Rural Affairs (observer status)
Faroe Seafood
Findus Group
Fishmonger's Company
International Fishmeal and Fish Oil Organisation
Le Lien Ltd
Loch Fyne Oysters Ltd
Marine Conservation Society
Marine Management Organisation
M&J Seafood
National Federation of Fishermen's Organisations
Natural England
New England Seafood
New Under Ten Fishermen's Association
RSPB
J Sainsbury
Seachill Ltd
Scottish association of Fish Producers' Organisations
Scottish Fishermen's Federation
Seafood Scotland
Sea Fish Industry Authority
Simpson's Seafood
Simson's Fisheries Ltd
South East Seafood
Scottish White Fish Producer's Association Limited
South Western Fish Producer's Organisation Ltd
Sustainable Fisheries Partnership
Tesco
United Fish Industries
Waitrose
WWF-UK