



WWF *for a living planet*

WWF Scotland

Little Dunkeld, Dunkeld
Perthshire PH8 0AD
t: 01350 728200
f: 01350 728201
ISDN: 01350 728276
wwfscotland.org.uk

Mr Richard Lochhead MSP
The Scottish Parliament
Edinburgh
EH99 1SP

Tuesday 25 November 2008

Re: EU-Norway negotiations and the future of cod

I am writing in advance of the EU-Norway fisheries negotiations this week. As you know, these negotiations have never before been so critical to the future of cod.

This year the key focus of the negotiations is on reducing the discarding of fish, in particular of cod. WWF believe that the key needs to be reducing the high levels of removal of cod (cod mortality) rather than solely focussing on the Total Allowable Catch (TAC) level. As Norwegian fishermen have shown, a return to prosperous and sustainable fisheries can be done by measures to stop the catch of cod in the first place, which lead to the return to abundant stocks and profitable fisheries.

Last month, WWF published a report on the management and technical measures in the Norwegian cod and groundfish fisheries. Norway has already taken the lead in terms of implementing solid measures such as a discard ban on the most commercially important species, closure of areas with juvenile fish, the use of sorting grids and a relatively large minimum landing size. The Norwegian system is characterised by closer adherence to scientific advice produced by ICES than that by the EU.

At last week's EU Fisheries Council, EU Fisheries Ministers agreed to a new Cod Recovery Plan, where a 25% mortality cut was set. However, we believe the true effectiveness of this agreement will be tested in the outcome of the EU-Norway negotiations. These negotiations are also pivotal to achieving a positive outcome at the December TAC negotiations.

We believe that as a minimum, the following measures must be rolled out across all EU fleets operating in areas with cod, many of which Scotland has already tested and implemented within the Conservation Credits Scheme:

- ❖ Effective discard controls - e.g. fleet-wide use of selective gear
- ❖ Ban on high grading in EU Waters
- ❖ Closures to protect young cod

Whilst voluntary measures are welcome, when it comes to actually delivery on increased cod stocks more wide spread mandatory adoption of these measures are needed. They have worked in Norway and have made its fisheries, unlike much of Europe's, profitable and sustainable.

Last November the EU made a commitment to Norway to introduce measures to reduce cod discards from then high level to 10% in the North Sea. However, this target has not been met, and 'discard levels of cod in 2007 and 2008 are high and levels are substantially higher than in previous years'¹. It is key that the EU signs up to concrete measures that ensure that the EU's commitments are met. The adoption of further measures is needed in light of the EU's demands to want to increase the TAC's in the range of 25%-35%.

Finally, in light of the European Commission's decision to drop its proposal on reducing discards, and commitment by some European Member States to address discards individually, we believe that the

¹ JRC Scientific and Technical Report, 29th Plenary Meeting Report of the STECF, 3-7 November 2008, p.45.



EU needs to work towards a discard ban and provide a commitment that it will do this within the framework of the new Common Fisheries Policy by 2012 at the latest.

Sincerely,

Louize Hill
Marine Policy Officer - WWF-Scotland