

Ministry of Agriculture,
Nature and Food Quality

> P.O. Box 20401 2500 EK The Hague The Netherlands

Hélène Clark
Director
DG MARE
European Commission
B-1049 BRUSSELS

Date 9 August 2018
Re Revised Joint Recommendation for a 2019 Discard Plan for demersal fisheries in the North Western Waters

Dear Mrs. Clark,

On behalf of the North Western Waters High Level Group, currently chaired by The Netherlands, I am sending you the revised Joint Recommendation for a discard plan for demersal fisheries in the North Western Waters as from 1 January 2019.

The revision has been undertaken in the light of the comments your services have made in the Commission letter of 24 July 2018 (Ares(2018)3916726 – 24/07/2018) on the initial Joint Recommendation transmitted to the European Commission on 31 May 2018, by the Irish chair.

The North Western Waters group has done its utmost to accommodate the observations of the Commission while still taking into account the specificities of the fisheries concerned.

Given the tight deadline and the fact that it took place during the summer holiday period the revision process was challenging and not optimal. The North Western Waters Group would propose to evaluate this process with you in the upcoming High Level Group, to avoid a similar situation in the future.

With this letter you will find the revised Joint Recommendation together with the relevant annexes. As there were no alternatives for the exemptions that were rejected in the Commission letter mentioned, in several cases the North Western Waters Group chose to modify the exemptions as much as possible in line with the Commission's comments and the advice from STECF.

In addition to this the North Western Waters Group seeks clarity from the Commission on the following de minimis proposals, that were rejected:

- Whiting: STECF has identified that the requested de minimis alone would not resolve the discard issue for whiting in the Irish Sea and further selectivity is needed. This was acknowledged in our submission. DAERA (Northern Ireland) remain committed to reducing further unwanted catches of whiting and have already in place a substantial programme of gear trials and subsequent roll out of improved gears. DAERA have recently updated the Commission on the extensive selectivity work undertaken since 2013 to present and the planned trials in the coming

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Our ref.

DGAN-ELVV / 18205892

Your ref.

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months. We would ask that the STECF or the Commission expand on their rejection by identifying any potential selectivity options they feel should be explored.

- Haddock: The member states included a small de minimis for the use of more selective gears in a targeted haddock fishery in the Irish Sea. STECF have identified a recent discard rate of 0.6% for the gears currently in use and conclude that more selective gears would further reduce discards. We consider the rejection of this de minimis removes an incentive for the fleet to adopt more selective gears, however given the updated discard rate the need for this de minimis is indeed questionable. We would invite the Commission to explain why further improvement is now needed.

We remain available for any inquiry you may have in this regard.

Yours sincerely,

[Redacted signature]

[Redacted name]

*Ministry of Agriculture, Nature and Food Quality
The Netherlands*