

UK Comments on STECF Requests

Exemption	Shortfalls	UK Comments
<p>Common sole (undersized only) caught with trawl gears in area VIIId</p>	<p>Location of sole nursery grounds has again not been provided. Provision of this material is a condition in the Delegated Act and should be supplied . Lead: UK</p>	<p>This sole exemption has already been approved and is in force at the moment. When the exemption was finalised in previous years France asked that text was added to exclude nursery grounds. From a UK perspective we would like this nursery ground exclusion to be removed as we have the following concerns:</p> <ul style="list-style-type: none"> • It is not easy to define nursery areas and there is no current legal definition of what the term means. We are concerned about the legal precedent any definition drafted now would set. • Data in a recent UK Cefas paper on sole nursery areas is ten years out of date – we don't know how consistent this data is and how much matters have changed in the past ten years. • If we did want to try and determine specific nursery areas to exclude from this exemption, we would need to formally consult our industry and regional delivery bodies – and we do not have time to do this in the very limited time until the next STECF meeting. • The evidence for this exemption has already been considered and has already been deemed strong enough for an exemption (with an over 80% survival rate). Our arguments were that the discard rate in the affected fisheries is very low anyway and the gear is as selective as it can be – so the possibility of excessive mortality is limited. The use of this exemption will not increase mortality as most of the fish survive. But mortality will increase if fishermen are made to land all their undersized sole catch in particular areas.

		<ul style="list-style-type: none"> Nursery areas are associated with concentrations of juvenile fish, which for sole is fish below 13cm. (The MCRS for sole is higher at 24cm.) The vessels affected by this exemption are very unlikely to catch this juvenile sole because of their selectivity measures. So we see no reason to exclude nursery areas from this exemption.
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<p>Skates and ray species caught by any gear in the North Western Waters (areas VI and VII)</p>	<p>Very few landings and discards data provided. EWG18-06 recognises these data are sparse and that there are quite a lot of species, however, Regional Group should provide whatever they do have to assist inform the evaluations.</p> <p>Lead: UK, NL</p>	<p>We have supplied all the relevant data generated and published on the STECF FDI database – which is the best data to use to ensure consistency. The same data could be disaggregated, but we do not think this will provide any more useful information. However we have attached a spreadsheet of the raw data for reference.</p> <p>Alternatively all Member States would need to independently produce data on skate and ray catches and discards by metier which would be very time consuming, and would probably not be consistent across Member States. We do not think this will be a useful exercise.</p>
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