

CFP Reform: Discards, Precautionary TACs, and Scientific Advice: An Independent Opinion

- 1) **It is universally agreed that it would be desirable to reduce current high levels of discarding as much as possible. However, it is unlikely that a discard ban would achieve that goal, because...**
- 2) **I do not believe that a discard ban could actually be enforced at a reasonable cost**, i.e. without putting at least one observer on every fishing boat, or employing thousands of people to sit and watch video recordings from on-board cameras. Without such a large (and unproductive) expenditure, a discard ban is much too easy to evade, would be ineffective and would fall into disrepute.
- 3) **Even if a ban could be operated in some approximate way, it would be extremely disruptive to try to do so** when the TACs used as a basis for quotas are a mixture of analytical TACs (which are based on scientific analysis and modelling based on data) and precautionary TACs (which are usually just average levels of recent catches). Analytical TACs rise and fall as the stock sizes fluctuate (in response to both exploitation and natural variability) while precautionary TACs cannot and do not do so. Thus the former should track the catching opportunities in mixed fisheries that are perceived by fishermen, but there will inevitably be a mismatch between the opportunities and the non-varying precautionary TACs. It is this mismatch (plus any “noise” in the analytical TACs, which are not all highly reliable) that generates the unavoidable part of discarding that is due to inappropriate regulations. The mismatch could only be avoided (while regulating by TACs & quotas) by basing all TACs on adequate scientific assessments.
- 4) **However, I do not believe that the scientific assessment process would be capable of producing adequate assessments for all the stocks for which TACs and quotas are currently used**, even if the scientists were given resources costing (say) ten times the current level. This is not simply because necessary data is often lacking, but because of fundamental difficulties (e.g. the ages of some species cannot be determined accurately, or surveys may not yield reliable indices of forthcoming recruitment).
- 5) **The combination of a discard ban and an *imperfect* system of TACs & quotas would therefore be unlikely to be effective in reducing discards in mixed fisheries, but would exacerbate the existing problems** caused by quotas that are not consistent with the variations in stock abundances. It would create undesirable and unproductive conflicts between fishermen and regulators, when what is required is greater mutual respect and trust (which has been achieved recently in many areas via the RACs and other collaborative initiatives).
- 6) **It would be preferable to develop alternative and more carefully targeted measures to achieve a reduction in discards.** These could include greater incentives for the use of more selective methods of fishing, development of markets for low-value and unsaleable species, a punitive levy on earnings from the sale of over-quota landings and undersize fish (rather than a ban on them), and in-year adjustment of precautionary TACs based on real-time acquisition of data from commercial fisheries.
- 7) **Another option would be the abandonment of TACs and quotas as the primary management tool for mixed fisheries**, in favour of a comprehensive system of effort control (see paper cited)

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