



By email:
English Producer Organisations
New Under Ten Fishermen's
Association
National Federation of Fishermen's
Organisation
Inshore Fishermen's Associations
Other UK Fisheries Administrations
Other interested parties

05 November 2014

Dear Sir/Madam,

Cod VIId (Eastern English Channel) fishery management for the remainder of 2014 – consultation

We are looking to gain insight into your views on the use of the remaining 2014 cod VIId quota within England.

Consultation questions

1. Do you have any views on whether the Marine Management Organisation (MMO) should use its ability to reallocate English quota during the year where the evidence suggests that such a reallocation would lead to the maximum use of UK quotas?
2. Do you have any comments on the amounts of quota proposed to be reallocated in table 4 and should these figures be based on any other evidence?
3. Other than the methods discussed in this paper, could you propose a different way of sourcing more cod VIId quota for the English under ten metre (U10m) pool?
4. If you are a current holder of unused cod VIId 2014 quota, do you have any additional evidence of how you intend to productively use the remaining amount to the benefit of the UK economy?

The Cod Vllid fishery

Table 1 below shows the EU quota distribution and uptake in 2014 as at 29 October 2014.

Table 1

Member State	2014 current (adapted) quota (tonnes)	Percentage of quota landed
Belgium	76.7	62.3
France	1501.4	28.2
Great Britain	166.9	49.8
Netherland	45.6	90.5

2014 Quota allocation and uptake within the UK

Table 2 below shows UK quota allocation and uptake in 2014 as at 29 October 2014 for producer organisations (POs) with quota remaining and the English U10m pool (quota swaps after 29 October 2014 have also been taken into account).

Table 2

Fishing Group & PO nationality	2014 current (adapted) quota (tonnes)	Percentage of quota landed
Aberdeen Fish PO - Scottish	0.1	0
Anglo Northern Irish – N. Irish	1.7	0
Anglo Scottish PO - English	0.1	0
Cornish Fish PO - English	10.2	1.5
English U10m pool	78.9	83.0
Fish PO - English	6.9	55.3
Interfish Fish PO - English	0.7	51.7
Lowestoft Fish PO - English	2.5	81.8
Lunar Fish PO - Scottish	0.2	0
Northern Fish PO - Scottish	2.5	0
Northern Irish Fish PO – N. Irish	4.7	0
North Sea Fish PO - English	0.7	0
South West Fish PO - English	16.1	9.9
Wales & West Coast Fish PO - Welsh	1.1	0

The U10m pool is the group with the highest uptake. Its members have caught 59% of the total of 133.6 tonnes (t) landed by English vessels in 2014.

Cod in area VIId tends to be a winter fishery with highest landings from January to March and then October to December each year. The MMO set a monthly catch limit of 400kg per vessel in October 2014. Due to the English pool allocation approaching exhaustion, this has been reduced to 250kg per vessel for November. We would normally be aiming to increase the catch limits for November and December, however the fishery is currently at risk of closure to the U10m pool before the end of 2014. The MMO has a responsibility to ensure the maximum use of UK quotas, without overshooting.

Closing the fishery would have significant social and economic consequences for the fleet based in the south east of England as two other key target stocks of plaice and skates and rays are closed due to quota exhaustion.

Table 3 shows the total landings made by UK vessels in November and December in 2013. It shows that the combined English U10m and non-sector pool landed 40.6 tonnes or 89% of the total. Assuming similar capacity to catch the stock this year, this group represents the greatest potential to use the remaining UK quota.

Table 3 - total landings of cod VIId by UK fishing groups in November and December 2013

Fishing group & PO nationality	Total quota landed November to December 2013
Aberdeen Fish PO - Scottish	0
Anglo Northern Irish – N. Irish	0
Anglo Scottish PO - English	0
Cornish Fish PO - English	0.1
English U10m pool and English non-sector combined	40.6
Fish PO - English	3.7
Interfish Fish PO - English	0
Lowestoft Fish PO - English	0.5
Lunar Fish PO - Scottish	0
Northern Fish PO - Scottish	0
Northern Irish Fish PO – N. Irish	0
North Sea Fish PO - English	0.5
South West Fish PO - English	0.1
Wales & West Coast Fish PO – Welsh	0

Sourcing extra quota for the English U10m pool

The potential for international swaps to source cod VIId quota has been explored with other EU Member States. There is considered to be a lag in data and therefore an underestimate of Member States' landings above taken from the EU database FIDES; therefore France is the only member with notable capacity to swap quota in to the UK. The French have proposed a swap as below:

GBR to FRA:

- 15 tonnes of plaice VIIIf,g (or more)

FRA to GBR:

- 8 tonnes of cod VIId

However, the English U10m pool only holds 1.1 tonnes of plaice VIIIfg and so cannot carry out this swap. As there is a collective 72.3 tonnes of cod VIId quota left within the UK (as at 29 October 2014), the MMO considers the use of this UK quota to be preferential to swapping quota internationally. The reason being that this avoids quota, and therefore the economic benefit associated with it, leaving the UK.

English quota management rules

The 2014 English quota management rules state the following relating to the reallocation of quota in-year:

- *“8.1 MMO recognises that the primary means of maximising uptake of English quota is the swapping of quota between groups. However, MMO reserves the right, after consultation with those concerned, to take quantities of individual stocks from any group where it appears unlikely to be able to catch its allocation in full. This would be reallocated among those groups most likely to make use of it.*
- *8.2 In considering any requests from groups for reallocation, MMO will consider whether those making the request have made genuine efforts to acquire extra quota from those groups holding surplus quota.”*

Given the evidence, it is the MMO's view that there are fishing groups that will not catch their allocation in full in 2014 and that the English U10m pool are the group most likely to catch it.

The MMO contacted those English POs with remaining cod VIId quota to ask whether they were prepared to trade this quota with the English U10m pool on Monday 27 October 2014.

Proposed in-year reallocation amounts

Table 4 sets out the amounts of quotas which MMO proposes to reallocate from English POs to the English U10m pool. These amounts leave some quota in each PO that is in excess of the total amount each group caught in November and December in 2013 (see table 3) and so should cover any further landings this year. PO 2014 banking amounts based on current figures and landings over the previous four weeks have also been taken into account. **No quota is proposed to be reallocated from POs administered by Marine Scotland, the Welsh Government and Department of Agriculture and Rural**

Development in Northern Ireland as reallocation is a decision for the managing fisheries administration in the first instance.

The proposed reallocation would be for 2014 only. The cod VIId stock does not yet have fixed quota allocation (FQA) units associated with it. It was created from the cod VIIb-k stock in 2009. Since then the quota has been allocated based on the FQA units for cod VIIb-k, resulting in several groups that are not active in the area receiving quota. This method is due to be reviewed in 2014 to create FQA units that fairly reflect the active industry.

Table 4 - amounts of quota proposed to be reallocated from English POs to the English U10m pool

Fishing group and PO nationality	2014 current (adapted) quota (t)	Quota proposed to be reallocated (t)	New quota (t)
Aberdeen Fish PO - Scottish	0.1	0	0.1
Anglo Northern Irish – N. Irish	1.7	0	1.7
Anglo Scottish PO - English	0.1	0	0.1
Cornish Fish PO - English	10.2	- 10	0.2
English U10m pool	78.9	+ 28.9	107.8
Fish PO - English	6.9	- 2.1	4.8
Interfish Fish PO - English	0.7	- 0.4	0.3
Lowestoft Fish PO - English	2.5	0	2.5
Lunar Fish PO - Scottish	0.2	0	0.2
Northern Fish PO - Scottish	2.5	0	2.5
Northern Irish Fish PO – N. Irish	4.7	0	4.7
North Sea Fish PO - English	0.7	- 0.5	0.2
South West Fish PO - English	16.1	- 15.9	0.2
Wales & West Coast Fish PO – Welsh	1.1	0	1.1

Timeline

As we are approaching the end of the year, it is important that a prompt decision is made by the MMO to ensure the best use of 2014 quota. As such, please submit your comments

to me by close on **Friday 14 November 2014**. A summary of the consultation responses will be published along with the MMO decision after this date.

If you require any further information please do not hesitate to contact me.

A handwritten signature in blue ink, appearing to read 'M Youell', enclosed in a thin black rectangular border.

Martyn Youell
Head of Fisheries Management

0191 376 2528/ 07770785039
martyn.youell@marinemanagement.org.uk

MMO helpline: 0300 123 1032