



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

Brussels, 13 OCT. 2008
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Opinion

Title **Impact Assessment on: the proposal for a Council Regulation establishing a long-term plan for the Western stock of Atlantic horse mackerel**

(draft version of 3 September 2008)

Lead DG **DG MARE**

1) Impact Assessment Board Opinion

(A) Context

The reform of the Common Fisheries Policy in 2002 set the basis for long-term management of fish stocks (as opposed to annual decisions). Long-term plans to provide for stock recovery have been adopted since 2003, starting with stocks that were the most problematic. The Commission is now starting to propose long-term plans for species that are less problematic, with the objective of being pro-active: a plan for Western Scotland herring has been adopted early 2008, and this proposed plan concerning the Western stock of horse mackerel would be the second one. It would be the first management plan for a stock for which the usual biological information (Spawning Stock Biomass) is missing and a new egg-survey-indicator would be used.

(B) Positive aspects

The actors that may be impacted by the proposal are well identified and the report makes a good attempt to link the operational objectives to the problem definition.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

Main recommendations: The report would benefit from a clearer problem definition presenting the reasons underlying the choice for applying a long-term management plan to this particular fish stock as well as for the choice of egg survey as biological indicator. Option 3 should be developed to present a true choice by introducing sub-options related to the choice of biological indicator and other design mechanisms. The economic impacts should be much more soundly explained

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and assessed. Existing data limitations should be clearly mentioned. During its meeting with the board, DG MARE agreed to make the necessary changes in the impact assessment on this basis.

(1) The general context and problem definition of the proposal should be more thoroughly substantiated. In particular, the current situation as regards the annually negotiated management of the stock and the problems arising from it should be better explained, making more explicit the rationale for the choice of this particular stock and for the necessity of a long-term management plan for this particular fishery. The reasons for not using the usual biological data should be better explained, as well as the reasons for choosing egg survey as a proxy for missing biomass data and the possible limitations and risks of this new indicator with regard to the CFP-precautionary approach. The report should further describe market trends for horse mackerel as well as forecast evolution of both catches and market situations.

(2) The choice of options should be more precisely documented in order to avoid a situation in which only one true option is presented. To this aim, option 3 should be divided into sub-options relating to different biological indicators and other implementation details (definition of TAC, reaction to stock decrease, controls...). These sub-options should then be analysed and compared. This should provide a clearer justification for the choice of the preferred option.

(3) More explanations should be provided on the expected impacts of the options. In particular, with regard to the economic impacts, table 7 p. 23 should be reworked: general explanations on how to read it should be inserted and specific explanation with regard to country differences and trends in profits should be added. The presentation of 3 years average data for profits should be considered. If the data can not be explained or is considered not to be sufficiently reliable, then the table should be dropped. As regards the link with other proposals, the report should explain why the horse mackerel fishery is not likely to be much affected by the discard proposal. The report should also present the current control situation of the horse mackerel fishery and describe how far it is concerned by the proposed new CFP control framework. Clarification should be provided with regard to fishing permits, inspection and observers costs, explaining e.g. that the baseline for inspection already depends on MS situations and how control costs are expected to evolve under the long-term management plan.

(D) Procedure and presentation

The report should be better structured and written in a less technical language. The monitoring and evaluation arrangements should be more precisely explained, in particular concerning data collection and stock monitoring.

2) IAB scrutiny process

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External expertise used	No
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