Mrs. Kirchner

Datum 24 may 2017

Betreft seabass management in the North Sea and Southwestern waters

Dear Mrs. Kirchner,

On behalf of the members of netVISwerk, small scale coastal and inland fishers in the Netherlands and Belgium, we would like to contribute our ideas regarding seabass management in the North Sea and Southwestern waters.

Our observation, supported by scientific studies and ICES papers, is that the last years there are a lot of juvenile seabass present in the coastal waters of the UK and the Netherlands. Given this situation we presume that the spawning stock of the seabass is not below the level that can produce a strong year-class. This is very fortunate and probably also the result of the management measures in place since 2015.

We propose a 2 tiered approach to management:

1. Management of the winter seabass concentration in the Channel area (VIIe and VIId) through strong EU regulations.
2. Management of the summer seabass in the coastal areas by the member states guided by the EU in terms of reporting on catch and effort and enforcement on seabass.

We see a lot of advantages in this approach:

a. Member states can manage the summer fisheries according to local needs. If management is not done properly, it will be mainly the yearly returning summer stock in that location that will be affected.

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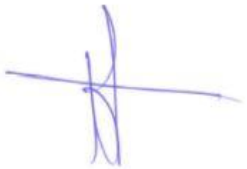
b. Problems with monthly and yearly catch limits can be avoided or left to the member state. The same is true for setting reference periods for the application of permits and the transfer of licenses from one vessel to another.
c. Member states will have to manage responsibly in order to maintain a minimum spawning stock. Proper reporting to the Commission should be continued and where needed improved.

We are always prepared to further elaborate on our ideas to you or your staff.

You are also very welcome to join one of our members in fishing for mullet with seabass as bycatch in the province of Zeeland, not far from Brussels.

Yours Sincerely,



Albert Jan Maat,

Chairperson netVISwerk