Capacidad y esfuerzo en las pesquerías exploratorias de la CCRVMA – comentarios de Nueva Zelandia

Nueva Zelandia ha solicitado que la comunicación adjunta sea circulada a todos los Miembros.

1 May 2012   APU/AMLR/14

Ms Aleksandra Kordecka
Head of the EU Delegation to CCAMLR
European Commission
Brussels
BELGIUM

Dear Aleksandra

I write in response to the EU's request for comments on its proposal on fishing capacity and effort in exploratory fisheries (CCAMLR-XXX/38).

New Zealand welcomes the EU's initiation of discussions on what is an important issue for CCAMLR.

As a Member involved in CCAMLR's exploratory fisheries from the outset, New Zealand is acutely aware of the problems of an Olympic styled fishery outlined in the EU's paper. Increasing levels of participation in the fishery in recent years which have not been matched with a commensurate contribution to CCAMLR science are a source of frustration to New Zealand.

We are also mindful that, under the current system, rational use can be undermined as catch limits are both under and over caught as the Secretariat struggles to accurately predict fishery closure dates.

Additionally, as a country with search and rescue coordination responsibility in the Ross Sea region within the CCAMLR Convention Area, New Zealand is concerned about the safety risks to crew on board vessels from crowded operating conditions resulting from increased concentration of fishing effort.

New Zealand broadly supports the aims set out in the EU's paper. We believe that in moving away from Olympic styled exploratory toothfish fisheries, it will be important that

CCAMLR establishes a transparent and principled framework to manage capacity that aligns incentives with our management objectives. In New Zealand's view, the following factors should be considered:

- contribution of quality science to CCAMLR;
- record of compliance;
- support to the CCAMLR System of Inspection;
- catch history;
- a provision for new participants (including new members and existing members not currently fishing).

New Zealand recognises that there are challenges in negotiating an allocation system based on catch levels. At the same time, we believe that negotiating a system based on vessel numbers is of comparable difficulty and that attempting to do this as a short- term approach, as suggested by the EU (paragraph 9), could jeopardise finding a longer term solution to the issues we are setting out to address. In New Zealand's view, while limiting vessel numbers could be argued to be an improvement on the current situation, it would not on its own eliminate the Olympic system and many of the problems identified would persist. New Zealand proposes that CCAMLR Members share their views at an early stage on establishing a catch based allocation system.

We recall the Commission's call last year for restraint while Members discussed the issue of capacity management. It is important to eliminate any incentives to increase capacity or effort while allocation discussions are ongoing, to avoid exacerbating the very issues we are seeking to manage. We therefore suggest that Members consider excluding any fishing that occurred after the 2010/11 CCAMLR season from a future allocation formula.

New Zealand suggests that the agenda for this year's Commission meeting include sufficient time for a fulsome debate of this important issue and that Members come fully prepared to engage. We encourage Members to also actively exchange views intersessionally, before and after the meeting in October.

I would like to take this opportunity to once again express New Zealand's appreciation to the EU for taking the initiative to encourage improvements in CCAMLR's management system.

Yours sincerely

Carolyn Schwalger
New Zealand CCAMLR Commissioner