



CONSEIL CONSULTATIF POUR  
LES EAUX OCCIDENTALES  
SEPTENTRIONALES

NORTH WESTERN  
WATERS  
ADVISORY COUNCIL

CONSEJO CONSULTIVO PARA  
LAS AGUAS  
NOROCCIDENTALES

EU Transparency Register Id. No: 8900132344-29

## ADVICE

### **On the Consultation on Fishing Opportunities for 2020 under the Common Fisheries Policy (COM (2019) 274 final)**

**17 September 2019**

The North Western Waters Advisory Council (NWWAC) exchanged preliminary views with reference to the ICES presentation of scientific advice for fish stocks in North Western Waters for 2020 and the Policy Statement from DG MARE at the meeting of the NWWAC Working Groups in Ghent (2<sup>nd</sup> and 3<sup>rd</sup> July 2019).

Further to these discussions, the members of the NWWAC have developed advice on the way in which levels of fishing opportunities are set according to the Common Fisheries Policy and on the basis of scientific advice.

With this advice the NWWAC presents its main contribution to the Commission for their work towards proposing the fishing opportunities in the North Western Waters for 2020 to the Council.

#### **1. General comments**

##### The Landing Obligation

The NWWAC, in co-operation with the NWW Member States Group, has developed a comprehensive tool (Choke Identification Tool), which serves to identify the choke risks at fishery level.

The Joint Recommendations (JR) for 2020 submitted by NWW Member States Group to the European Commission contained *de minimis* and high survivability exemptions, and technical measures designed to increase the selectivity in key fisheries. The NWWAC secretariat updated the Choke Identification Tool and evaluated the mitigation measures included in the Joint Recommendations for 2020 to assess whether further recommendations to resolve choke issues in the NWW should be the subject of future advice.

The NWWAC prepared the present advice at its meetings in September (04-06<sup>th</sup> September, Dublin). This advice also includes a comment on the STECF report evaluating the Bycatch Reduction Plan (BCReP).

## The Western Waters Multi-Annual Plan

It is a CFP objective to achieve MSY exploitation rates for all stocks by 2020. The WW MAP specifies a list of species for which precise MSY-related targets should be set. These species are defined for the different regional fisheries as a group of main target species. The other species called “by-catch species” are managed to remain within safe biological limits, provided they are offered a comparable degree of conservation than those with MSY advice. The NWWAC highlights the importance and relevance of the species defined as “main” targets and would value the opportunity to co-operate with the Commission and Member States noting that this list may in the future be subject to review.

## Ecosystem Based Fisheries Management

The NWWAC advises that the Commission makes use of all available information on ecosystem-based management when proposing TACs for 2020 to the Council.

## **2. Development of the state of the stocks**

The NWWAC prepared general comments and specific ones on the ICES assessment and advice for some stocks as published in June 2019.

### By-Catch Reduction Plan

Considering the zero-catch advice for several stocks in western waters for 2019, the Council adopted bycatch TACs and the Member States concerned committed to developing BCRPs and to implementing full catch documentation for these stocks from 2019. The BCRPs were introduced to avoid immediate choke situations arising from zero TAC advice.

The BCRP developed by the NWW MSG was evaluated by STECF in July 2019. STECF found that the BCRP “Does not fulfil the commitments made by the Member States as it does not contain any elements to ensure reduced by-catches of the relevant stocks over and above the measures already included in the discard plan”.

The OIG Group within the NWWAC – based on this year’s experience and taking account of the STECF conclusions – do not consider this an option going forward given the MSY 2020 deadline, whereas the NWWAC Industry Group emphasises the need to keep all options open to avoid premature closure of fisheries.

### Status of cod stocks in the North Western Waters.

The NWWAC noted that in the assessment of the state of the cod stocks it is unclear to what extent predation and climate change have an impact. These are elements contributing to members of the fishing industry having doubts about the quality of the assessments. Therefore, the NWWAC appreciates the announcement of a workshop in November to consider the quality assurance of ICES assessment of cod stocks.

## Skates and Rays

The NWWAC advice for skates and rays (07<sup>th</sup> June 2019, [link](#)), includes a list of actions and considerations for reducing mortality of skates and rays on board vessels to be taken into account by both the Member States as well as the fishing industry. The NWWAC is keen to discuss this advice and progress the individual action points in cooperation with the Commission and the NWW Members States Group, albeit the ICES advice on skates and rays will not be available until October 2019.

## Sea Bass

The NWWAC noted an improvement in the perception of the stock based on the ICES advice, with fishing mortality estimates showing a decrease. However, the stock is still in recovery and proper recruitment needs to come through. Moreover, bycatches still represent a big issue given the mixed nature of fisheries in the Channel and the stock's widespread presence in those fishing grounds. The NWWAC has established together with the NSAC a joint Focus Group on sea bass covering ICES areas 4b-c, 7a and 7d-h. The Focus Group aims at preparing advice to the European Commission on the measures to be taken in 2020 in both commercial and recreational fisheries to aid the recovery of sea bass stocks. Also, the Focus Group will look for solutions for the unintended consequences of the current management system, such as measures to reduce bycatch and improve monitoring and control. The combination of measures proposed by the Focus Group should support the fishery to remain within the range of total catch allowance as advised by ICES.

## West of Scotland

The advice for haddock in subarea 6.a is combined with the North Sea (Subarea 4 and Subdivision 20). There is no survey index available for the whole area as the benchmark meeting in 2014 (ICES WKHAD 2014) concluded that the surveys in the West of Scotland conducted by Scotland and Ireland covered too small a proportion of the overall stock area to be considered as reliable indicators of overall stock dynamics. Last year the NWWAC recommended that survey data should cover the whole area as 1) haddock is widely distributed around the west coast of Scotland and can be caught in most areas within the 200 m depth contour<sup>1</sup> and 2) with the relatively limited cod and whiting quotas in recent years, many vessels have tended to concentrate more on the haddock fishery<sup>2</sup>. Scientific surveys could be accompanied by e.g. industry data collected through Fully Documented Fisheries and/or the effect could be evaluated of combining the indices of the North Sea IBTS-Q1 and West of Scotland ScoGFS-Q1. No joint survey between the North Sea and ICES area 6a concerning haddock has been carried out to date and the AC would like to reiterate our recommendation from last year.

Noting that the current assessment and advice for cod in 6a does not take stock ID uncertainty into account, the NWWAC strongly recommends that additional stock identification work is undertaken as a matter of urgency to resolve this matter.

---

<sup>1</sup> ICES 2015 Stock Annex for Haddock 6.a ([link](#))

<sup>2</sup> ICES 2017 Chapter 8 Haddock in Subarea 4, Division 6.a and Subdivision 20 (North Sea, West of Scotland and Skagerrak) in the Report of the Working Group on Assessment of Demersal Stocks in the North Sea and Skagerrak (2017) 26 April–5 May 2017, ICES HQ. ICES CM 2017/ACOM:21. 1248 pp.

The NWWAC also recommends addressing the lack of reliable catch data on bycatch species (Rockall cod, sole and plaice in VI) since this can have an impact on scientific stock assessments and the resulting advice. Therefore, following the precautionary approach, TACs have been set at low levels. This lack of data and assessment has the potential for such stocks to become high risk chokes. Rockall cod is an example, which is likely to be a high-risk choke in 2020.

### Celtic Sea

Regarding the zero TAC advice for cod (7e-k) and plaice (7h,j,k) the NWWAC recommends that ICES provide advice to the Commission on the volume of unavoidable bycatch in these fisheries as was provided in 2018<sup>3</sup>.

The NWWAC will also review the management measures identified by STECF in their evaluation of the BCR<sup>eP</sup> for their applicability in reducing unavoidable bycatch of these species. The NWWAC would welcome further discussion with the NWW MSG on these management measures.

The NWWAC recommends that at the upcoming ICES benchmark workshop the management unit of plaice in 7hjk is discussed as the report of the working group states that catches for 7h should be linked with the stocks of 7e, f & g and that a request was made for more flexibility between these stocks.

Sole 7hjk: The NWWAC notes the atypical recruitment data in the ICES assessment for 2018 and recommends that this is reviewed.

Sole 7fg: The ICES advice for this stock for the 2020 TAC is a 106% increase of the 2019 TAC. Based on this large increase the NWWAC supports an in-year review of the 2019 advice leading to the possibility of additional TAC being made available in 2019.

### English Channel

The NWWAC noted that for sole 7d ICES reported a delay to the stock advice till October 2019. The AC would appreciate to receive more details on the reasons for this delay and recommends reviewing a recent French scientific analysis to contribute to the assessment. The study "SMAC, Eastern Channel Sole: improvement of knowledge for better management of the stock" (Ifremer, 2015-2018) confirms a trend towards the existence of a strong spatial structuring of the East Channel sole stock with several sub units. This appears particularly in the South-Western part of the area with a certain isolation of sole off the Normandy coast (France). The North-Eastern part of the Eastern Channel would constitute a transition zone between the stock of zone 7d and that of zone 4c.

---

<sup>3</sup> Reference to 2018 ICES advice required

<sup>4</sup> [STECF plenary 19-02](#). p.102 onwards

## Irish Sea

The NWWAC will participate in the upcoming ICES WKIrish workshop to assist in the development of an ecosystem-based approach to fisheries management in the Irish Sea.

The NWWAC notes that ICES has changed the basis for the assessment of cod in the Irish Sea. In 2017 and 2018, an Age Structured Assessment Programme (ASAP) model was used to provide advice as a category 1 stock. However, for 2020, the advice is based on the biomass of the Q1 NIGFS-WIBTS as an indicator of stock size under a category 3 approach. This dramatically changes the perception of the stock and results in ICES advising a very large (86%) reduction in the TAC for 2020.

It is noted that catches of cod, haddock and whiting in the two Irish Sea statistical rectangles, 33E2 and 33E3, are included in the relevant assessment for the Celtic Sea and not in the Irish Sea assessments. For cod and haddock, the catches in these statistical rectangles are quite significant (18% of catches of cod and 7.5% of haddock). However, as it is not altogether clear how this translates into setting the TACs for these stocks in the Irish Sea and Celtic Sea the NWWAC seeks clarification as to whether these catches are included in the TACs for the Irish Sea or Celtic Sea.

The NWWAC is also concerned over the potential influence this may have on the validity of the stock boundaries for cod, whiting and haddock. In this regard, the NWWAC recommends a scientific analysis to identify if there are separate stocks in the Irish Sea and the Celtic Sea.

— END —