



Dublin, 29 November 2016

Subject: TAC proposal 2017 – NWWAC Management Strategy for sole in the Eastern Channel

Dear Mr Machado,

The NWWAC has provided the EC and the North Western Waters Member States with advice on a Management Strategy for the sustainable exploitation of the stock of sole (*Solea solea*) in ICES Division 7.d (Eastern Channel) in 2015 (Annex 1¹). In the EC policy paper on the TAC setting ((COM(2016) [396 final](#))), it is mentioned that the stock is still in poor shape and a management strategy was put in place in 2015 to recover the stock.

The NWWAC advice was based on the evaluation of STECF² of several scenarios which presented outcomes with high probabilities of achieving F_{MSY} by 2020, while maintaining biomass levels above $MSY B_{trigger}$. The advice included the suggestion from the NWWAC fishing industry members to restrain the TAC variation, which was evaluated by STECF in 2016³ where it was concluded that: *adding the Inter-Annual TAC constraint on the rule agreed in the 2015 Joint Statement would not increase the biological risks from now to 2020 in any significant way. Rather, the constraint may actually reduce the risk of the cycling behaviour where the advice changes abruptly from year to year when the stock oscillates between slightly below and slightly above $MSY B_{trigger}$.*

In the proposal from the Commission for the TAC setting for 2017 (COM(2016) [0698 final](#)), the Joint statement adopted at the December Council in 2015 is implemented without reference to this latest information. The NWWAC would like to point out that the fisheries members of the NWWAC stress the need for stable catch opportunities and would consider a 15% TAC variation a maximum change that is both socio-economically and biologically sustainable, while members of the ‘other interest groups’ are not in favour of constraining inter-annual variability on TACs.

Yours sincerely,

Emiel Brouckaert

Chairman of Executive Committee of the North Western Waters Advisory Council

Cc: North Western Waters Member States representatives

¹ [NWWAC Management Strategy advice for sole in the Eastern Channel](#) – 8 December 2015.

² STECF – 50th Plenary Meeting Report ([PLEN-15-03](#)). 2015.

³ STECF – 51st Plenary Meeting Report ([PLEN-16-01](#)). 2016.



Annex:

NWWAC advice towards a Management Strategy for the sustainable exploitation of the stock of sole in ICES Division 7.d (Eastern Channel)

8 December 2015

Strategy for TAC setting:

- A. Reduce the TAC in 2016 to 3000 t landings⁴ (14% reduction).
- B. Keep the TAC constant to reach F_{MSY} (0.3) in 2020 at the latest.
- C. Biomass safeguard: If at the start of the year for which advice is provided Biomass is assessed by ICES to be below B_{pa} ($B < B_{pa}$), then the TAC would be set at F_{MSY} .
- D. If $B > B_{pa}$ and TAC 3000t produces $F < F_{MSY}$, then TAC = TAC F_{MSY} .
- E. In 2019:
 - If $B > B_{pa}$ and TAC 3000t produces $F > F_{MSY}$, then TAC 2020 = TAC F_{MSY} .
 - If $B < B_{pa}$ and TAC 3000t produces $F > F_{MSY}$, then TAC 2020 = ICES advised.

Suggestion:

Establishing rules for the annual setting of the TACs and associated measures in view of a long-term and specific target, a management strategy for sole in VIIId should provide stability and predictability to the fishery while ensuring that the fish stock is exploited to meet the legal requirements. Because of the technical measures already in place, the reduction in TAC and the biomass safeguard, the industry members of the NWWAC are interested to see if a provision of socio-economic stability could be added to the strategy for TAC setting by constraining inter-annual variations in the TAC in the case where TAC proposal would be a drastic reduction.

The industry members of the NWWAC advise that a scientific evaluation is conducted that considers the impact on the stock and the socio-economics of the fishery, of constraining the inter-annual variability in the TAC by 15 or 20% in cases where point C. is implemented.

Such an evaluation should include conditional obligations for the implementation of additional technical measures in order to reduce fishing mortality and offset the impact of constraining the TAC variability, in such circumstances.

Members of the 'other interest group' are not in favour of constraining inter-annual variability on TACs. If the impact of additional technical measures on fishing mortality can be quantified and shown to reduce F then these could be taken into account in the setting of TACs.

⁴ For this stock the landing obligation is in place from 1st January 2016. The evaluations have been done on the basis of landings and the advice excludes potential necessary TAC uplifts to accommodate for the landing obligation.