



Dublin, 11<sup>th</sup> May 2018

**Subject:** Request to the European Commission for the early provision of advice on undulate ray (*Raja undulata*) in area 7d and 7e

Dear Mr Machado,

Following advice from the NWWAC<sup>1</sup>, the Commission reopened undulate ray fisheries in 7 d & e. As a result a catch limit was set in 2015 and 2016 of 100t in 7e and 11t in 7d and increased again in 2017. In 2016 ICES published encouraging advice showing that the biomass of undulate ray in the Channel had increased by 187%, based on the difference between the biomass indicators for the periods 2009 -2013 and 2014-2015<sup>2</sup>. Although this advice also estimated that the stock size had increased by more than 20% between 2009 and 2013 (i.e. 453%) and between 2014 and 2015 (i.e. 27%), due to the uncertainty associated with the data for this stock, an uncertainty cap of 1.2 equivalent to an increase of 20%, was applied to the landings in 2015, according to the ICES precautionary approach, to determine the landings advice for 2017 and 2018 (i.e. 65t).

Scientific observation on commercial fishing vessels have confirmed information provided by fishermen to ICES, regarding the fact that undulate ray can be locally common in some areas (e.g. Normano-Breton Gulf and south coast of England)<sup>3</sup>. The French fleet for example found that despite the introduction of a very limited quota, the establishment of a daily and weekly landing limitation and of a minimum landing size, the catch limit was reached after approximately one and a half months of fishing. This indicated an abundance on the ground that is not reflected in the advice and has resulted in a significant amount of discards.

The quality of landings data has generally improved since the separate recording of ray species became compulsory in recent years<sup>4</sup>. This has led to an increase in the TAC advised by ICES for most ray species and the subsequent group TACs for all skates and rays, since 2015. With this in mind, the rollover of the undulate ray catch limit in 2018 was unexpected, as it was anticipated that there would be an increase in the TAC for these stocks also.

<sup>1</sup> NWWAC letter to European Commission on Undulate Ray Management  
[http://www.nwwac.org/fileupload/Opinions%20and%20Advice/Year%2010/NWWAC Letter Undulate Ray Mgmt 21Nov2014\\_EN.pdf](http://www.nwwac.org/fileupload/Opinions%20and%20Advice/Year%2010/NWWAC%20Letter%20Undulate%20Ray%20Mgmt%2021Nov2014_EN.pdf)

<sup>2</sup> Index Ratio (A/B). ICES advice 2016 Undulate ray (*Raja undulata*) in divisions 7.d and 7.e (English Channel)  
<http://ices.dk/sites/pub/Publication%20Reports/Advice/2016/2016/rju-ech.pdf>

<sup>3</sup> Ibid

<sup>4</sup> Regulation (EC) 43/2009 <https://publications.europa.eu/en/publication-detail/-/publication/5c0c1048-e1f8-45bb-a055-a55ca2deed12/language-en>



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At the December Council of 2017, the Commission made a commitment to ask ICES to provide earlier advice on all stocks of undulate ray, in order, to determine if an in-year amendment of the TAC could be considered by the Commission (i.e. 13780/17 PECHE 414 + ADD 1-2 - COM(2017) 645 final '*In the beginning of 2018, the Commission will ask the ICES to provide earlier scientific advice on all stocks of undulate ray. If the advice allows, the Commission will consider to propose a corresponding in year amendment for the TAC as soon as possible*'<sup>5</sup>.)

The NWWAC asks that the Commission quickly puts this commitment into action considering the urgency of the situation on the ground (i.e. in 7d and 7e) and the mismatch between the catch limit and the abundance of undulate ray.

The NWWAC also asks that the Commission specifically request ICES to provide advice on the TAC level and to analyse the contribution of the data obtained from scientists and from the industry.

Yours sincerely,

Emiel Brouckaert

Chairman  
Executive Committee  
North Western Waters Advisory Council

<sup>5</sup> <http://data.consilium.europa.eu/doc/document/ST-5382-2018-INIT/en/pdf>

