



CONSEIL CONSULTATIF POUR
LES EAUX OCCIDENTALES
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NORTH WESTERN
WATERS
ADVISORY COUNCIL

CONSEJO CONSULTIVO PARA
LAS AGUAS
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Recommendations

For cod in West of Scotland area

10 December 2018

The NWWAC held a Focus Group meeting on the West of Scotland cod stock in Edinburgh, on 15th November 2018. The rationale for the Focus Group was a recognition of the incompatibility of the current zero-TAC with the Landing Obligation. The Focus Group discussed options to improve the sustainable exploitation of cod.

Fishing Opportunities for 2019

The NWWAC notes that the Commission, in its proposal for the 2019 TACs (COM (2018) 732), propose a zero TAC for this stock ("COD/5BE6A). In addition, and in light of the Landing Obligation, the Commission has also proposed a new *Union by-catch* TAC with the condition that NO directed fishing for cod be permitted. The by-catch level proposed for 2019 is based on the ICES catch estimates for 2019 reduced by, what appears to an arbitrary, 20%.

The NWWAC acknowledges the intention of the Commission in proposing this as a solution to the zero-TAC (and quota) problem intended to facilitate mixed fisheries.

Industry representatives indicated that actual catches are currently higher than those reported by ICES (Table 7 in Cod 6.a ICES advice¹) and the proposed *Union by-catch* TAC is unlikely to be sufficient to cover catches. This may potentially result in the early closure of fisheries in this area as a result of small catches of cod in fleets without available quota. This includes inshore vessels who have been disproportionately impacted by previous management measures taken to protect cod in Area 6a. Early closure due to a lack of cod quota will have serious economic implications for the fleets fishing in the area.

OIG members of the NWWAC² remain of the view that TACs should not be set above scientific advice, unless Member States provide socio-economic evidence (envisaged in Recital 7 of the CFP) demonstrating that setting TACs in line with scientific advice will seriously jeopardize the social and economic sustainability of the fleets involved.

¹ ICES advice on fishing opportunities, catch, and effort in the Celtic Seas Ecoregion for Cod (*Gadus morhua*) in Division 6.a (West of Scotland) (2017). Table 7 History of the advice, catch, and management. [link](#)

² NWWAC advice on Addressing Choke Risk in NWW after exemptions (November 2018). [link](#)

Taking account of recital 8 in the COM fishing opportunities proposal, and, given the current scientific advice for the stock (zero catches), the NWWAC suggests that if we are to ensure the detailed and accurate documentation of catches of all fishing trips, tools should be selected which are cost effective and appropriate to those vessels^{3,4}.

ICES benchmark in 2019

The NWWAC notes that ICES will undertake an inter-benchmark evaluation of the cod stock in 2019 to evaluate the current assessment model. The NWWAC noted that the model currently employed estimates consistently high fishing mortality and low biomass. This is in contrast to trends estimated for other stocks, like whiting and haddock caught in the mixed fishery in the same area. Scientific experts suggested that this may in part be due to the selection pattern used in the assessment model, which is different to that used in cod assessments in neighbouring management units (e.g. the North Sea and Irish Sea). Re-running the model with different assumptions gives a different, more positive, perception of this stock. The industry representatives concur that this is more akin to anecdotal evidence reported by fishermen.

The NWWAC welcomes the inter-benchmark evaluation and recommends that the Commission consider the findings carefully and act accordingly.

Stock boundaries and connectivity

The NWWAC notes that a proposal for a joint study is being developed by NWWAC members in collaboration with the ICES Stock Identification Methods Working Group (SIMWG). This study, presented by Dr Edward Farrell, aims to identify the biological populations and connectivity between the cod stocks in ICES divisions 4, 5, 6 and 7⁵.

The NWWAC is currently seeking funding for this study, which if successful, will be overseen by a NWWAC Focus Group on West of Scotland cod. The NWWAC notes that small-scale projects such as this can be funded by the Executive Agency for Small and Medium-sized Enterprises (EASME)⁶.

³ NWWAC advice (January 2018) Response to EC proposals on the EU Fisheries Control System. [link](#)

⁴ NWWAC advice (April 2018) Addressing High Choke Risk stocks under the Landing Obligation. [link](#)

⁵ NWWAC advice (September 2018) on the Consultation on Fishing Opportunities for 2019 under the common fisheries policy (COM (2018) 452 final) [link](#)

⁶ More information on Calls for tenders and EASME funding opportunities are available on the COM website [link](#)