



Ms Charlina Vitcheva
Directorate-General for Maritime Affairs and Fisheries
European Commission
1049 Brussel
Belgium

Dun Laoghaire, 04 May 2022

Dear Ms Vitcheva,

Subject: NWWAC advice on seabass Catches Allocation Tool

Following the discussions held at the last meeting of its Working Group 3 English Channel in March, the North Western Waters Advisory Council (NWWAC) wishes to reiterate its advice on the catches allocation tool for seabass developed by ICES at the request of the European Commission, as included in the [joint NWWAC/NSAC recommendations on management measures for seabass for 2022](#).

The tool was developed to test management scenarios for commercial fishing (annual or monthly individual limits by trade) and for recreational fishing (daily individual limit per period), using ICES sampling recommendations as the maximum value. The tool was first made available to the NWWAC to prepare its opinion at the end of 2019 and an updated version was released in October 2020.

In view of the concerns that the use of the tool gave rise to, and the points of weakness identified and expressed in the NWWAC seabass advice from 2019, 2020 and 2021, the NWWAC wishes to raise the importance of a revision and substantial improvement of the tool.

The NWWAC appreciates that the Commission is aware of these issues and that an Expert Working Group on non-quota species is being established within the Scientific, Technical and Economic Committee for Fisheries (CSTEP EWG 2022-04), which will also discuss the update of the abovementioned tool. It is vital that this task is prioritised to ensure the tool is fully functional in time to be used for discussions on fishing opportunities 2023.

Paragraph 2 in the [NWWAC 2020 advice on seabass](#) contains a detailed explanation regarding the weaknesses of the tool in its current version and proposes a set of opportunities for improvement, as summarised below:

- The catches allocation tool does not consider catches seasonality, which is more apparent for certain métiers certain métiers, nor the higher activity constraints imposed on commercial fishing by a monthly and catch limitation. The tool does not consider restrictions applied in





reality and cannot be used to test measures (such as the percentage of total catch per trip for demersal trawls and seines) other than individual catch limits.

- The tool is very unrealistic in assuming that each vessel exhausts its entire catch limit and consequently it overestimates the actual catches.
- Results overestimation can be addressed, at least partially, by subdividing the number of vessels corresponding to each métier into three groups according to the individual landings of each vessel in the previous year. This method would help to give sufficient credibility to the estimate levels to allow their comparison with ICES recommendations.

From the recreational fisheries point of view, the current version of the tool shows an increase of the recreational impact of about 7%, with similar bag limits compared to last year. This reasonably corresponds with the increase in spawning stock biomass. Therefore, the AC would support the use of the current version of the tool for discussing management measures for recreational fisheries.

As mentioned in previous correspondence with the Commission, the NWWAC stands ready to contribute to the work of the Specialised Committee on Fisheries on this topic and other topics in the AC's remit.

Thank you for your attention to this urgent matter and for the collaboration with the Commission, which is crucial for our work. We are counting on your expeditious follow-up and look forward to your response.

Yours sincerely,

Emiel Brouckaert
NWWAC Chairman

