

Ms. Charlina Vitcheva
Director-General for
Maritime Affairs and Fisheries (MARE)
European Commission
Rue Josef II 99, 1000 Brussels
Belgium

Dun Laoghaire, Zoetermeer, 6 April 2023
NSAC Ref. No.: 04-2223

Dear Ms Vitcheva,

Subject: NWWAC/NSAC request for clarification on the Prohibited Species List

In 2020, the North Western Waters and North Sea Advisory Councils established a joint Focus Group on Skates & Rays which has developed multiple advice documents over the past years to both the Commission and the Member States within the respective remit areas.

Both Advisory Councils previously raised their concern regarding the prohibited species list which was identified by the NSAC in their original letter on this subject from 2019, followed by a joint letter from the two ACs in 2020.

The NWWAC/NSAC welcomed the review regarding criteria for the classification of prohibited species by the STECF in 2022 and the development of a decision tree as “a starting point to set out a standardised approach to classify protected species in the future.”¹

As part of the fisheries consultations for 2023 between the EU and the UK a TAC was set for spurdog, following the catch advice from ICES. However, this species was originally included on the prohibited species list and it is unclear what criteria were applied to remove it from this list.

Therefore, the NWWAC/NSAC would be grateful if the reasoning for this change would be shared with the ACs. In addition, we also seek clarification whether the STECF recommendations regarding the application of the decision tree to any potential changes in the prohibited species list will be taken into account in the fisheries management.

By making the process of how species are included and removed from the prohibited species list as transparent as possible, we sincerely hope that the list can serve its intended purpose of ensuring the most vulnerable fish species are protected, whilst at the same time allowing sustainable fishing operations to continue.

Yours sincerely,



Emiel Brouckaert
NWWAC Chair



Kenn Skau Fisher
NSAC Chair

¹ Scientific, Technical and Economic Committee for fisheries – Skates & Rays Management (STECF-22-08)

