



Ms Charlina Vitcheva
Director-General for Maritime Affairs and Fisheries
European Commission
Jozef II-straat 99
1000 Brussels
Belgium

Dun Laoghaire, 6 December 2024

Dear Ms Vitcheva,

Subject: Advice on stocks to prioritise for benchmark workshops by ICES

At the October plenary meetings of the North Western Waters Advisory Council (NWWAC), discussions within regional Working Groups highlighted the need for enhanced scientific advice to better support effective fisheries management of key stocks in the NWW region. These discussions built upon the valuable exchange with the international Council for the Exploration of the Seas (ICES) held in July, where Joanne Morgan, ACOM Vice-Chair, presented the 2025 ICES advice.

During these exchanges, the NWWAC noted that the current Category 5 and 6 assessments are inappropriate for providing catch advice as they are based on very limited catch data that do not reflect accurately the actual state of the stocks. We would contend these current assessments are not fit for purpose in providing catch advice. We have therefore recommended in our recent advice on fishing opportunities¹ that ICES adopts a phased approach to upgrading these assessments, moving Category 5 and 6 stocks toward Category 3 and, ultimately, Category 1. This transition would result in more reliable stock estimates, providing a stronger foundation for fisheries management.

The AC recognises the methodological challenges and resource demands involved in shifting assessments to different categories within the ICES framework. However, members view it as essential to prioritise stocks that present urgent challenges to the industry and to enhance the assessment process by integrating all available scientific data. This approach would ensure that ICES advice is both comprehensive and resilient, thereby supporting sustainable fisheries management across the region.

Considering this, the NWWAC would like to recommend that the following stocks are prioritised by DG MARE in their requests to ICES for benchmark workshops for 2025:

- **Sole 7 h-k.** The stock is currently assessed as an ICES category 5 stock without information on abundance or exploitation, so the precautionary approach is followed in providing catch advice. This has presented difficulties for several NWW Member States to manage their fisheries activities in the area. A benchmark of this stock is crucial to improve the reliability and applicability of the scientific advice and improve the categorisation of the assessment.

¹ [NWWAC advice on the Communication from the Commission “Sustainable fishing in the EU: state of play and orientations for 2025” COM\(2024\) 235 final and on the ICES advice published on June 28th, 2024](#)





Extensive scientific effort has been made in Belgium to enhance stock assessment methodologies. This included work by the Flanders Research Institute for Agriculture, Fisheries and Food, which has been engaged in a DNA-based project aimed at improving abundance estimates and stock quality over several years. Although there is no indication that these results have been integrated into the current ICES advice, NWWAC members believe they hold significant potential for strengthening future assessments and should be considered as part of a benchmark.

- **Whiting 7 b-c, e-k.** There is an urgent need to improve the understanding of the relationship between the Celtic Sea whiting stock (7b,c, 7ek) and the whiting stock in the North Sea and Eastern Channel (4 an 7d). The NWWAC find it hard to understand why the advice for this stock and for the adjacent North Sea stock continue to be so different. The advice for the North Sea whiting stock for 2025 is for a large increase compared to the zero-catch advice for the Celtic Sea stock. Observed catch yields for the Celtic Sea and Western Channel whiting stock are stable, not reflecting the stock dynamics described in ICES advice for the whole assessment area. This raises questions about the links between the two stocks, and in particular the linkage of the Western and Eastern portions of the stock. Population genetics and tagging studies provide information on stock structure and migrations, but, according to ICES, the degree of separation between the Celtic Sea stock and surrounding stocks remains to be clarified. It is therefore necessary to better define the identity of these stocks using new data assessed as part of a benchmark for this whiting stock. Furthermore, in terms of selectivity, only the square-mesh panels adopted in 2012 are currently taken into account in assessments. However, mesh size modifications and selective devices have since been introduced on trawlers in Celtic seas. These technical improvements, which have probably influenced the exploitation pattern, should be integrated into the assessments to better align the TACs of whiting stocks in the Western Channel and Celtic Sea (7b-c, 7e-k) with those of the Eastern Channel and North Sea (4, 7d).
- **Plaice 7fg.** The scientific advice for a 72% reduction in catches by 2025 is extreme, highlighting a significant concern over the stock's status. The advice is based on ICES's category 3 framework using the rfb rule, which has led to substantial decreases in advice since 2022. This rule assumes high precautionary measures, yet the necessary data to justify this approach are reportedly lacking. Fishers report a perceived abundance of plaice in the northern part of 7fg, while the biomass index trend (r) appears to rely on a single survey conducted in the southern part, which may skew the perception of stock abundance and health. This discrepancy highlights a need for comprehensive and spatially representative data collection and analysis. While this stock was benchmarked in 2022, a new benchmark would allow ICES to evaluate the appropriateness of the current assessment methods, address data gaps, and potentially develop a more representative and robust scientific basis for management advice.
- **Lemon Sole 3a, 4, 7d.** The 30% decrease in this year's assessment is attributed to a declining biomass index. However, fishers report a contrasting experience, observing an apparent abundance of the stock at sea. This significant discrepancy highlights potential shortcomings





in the current assessment methods or data inputs. This uncertainty necessitates a thorough review to validate and, if needed, improve the methodologies. A benchmark workshop provides an opportunity to reassess the data collection, indices, and assessment models for lemon sole. By incorporating both scientific data and stakeholder insights, the process could lead to a more accurate understanding of stock status and improved management strategies.

On top of the four stocks mentioned above, the NWWAC would like to reiterate that all category 3 to 6 assessments are not fit for purpose and efforts need to be made to ensure that these actually reflect the state of the stocks.

Thank you for your attention on this matter, we look forward to a continued appreciated cooperation.

Yours sincerely,

Emiel Brouckaert
NWWAC Chair

