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Dun Laoghaire, 3 June 2021

Dear Mr Banel,

Subject: NWWAC advice on the draft Joint Recommendation Technical Measures in the North Western Waters

Thank you for the opportunity to provide feedback on the draft Joint Recommendation Technical Measures in the North Western Waters which we received from your services on 30 April 2021.

While the North Western Waters Advisory Council (NWWAC) welcomes the information obtained from the NWW MS Technical Group (TG) meetings in February, March and April, and of the High Level Group (HLG) meeting on 22 April 2021, it is unfortunate that no draft was available for NWWAC members to discuss prior to its submission to the Commission on 01 May.

For what concerns the content of the draft Joint Recommendation, NWWAC members would like to raise the following points:

1) The raised fishing line

The raised fishing line is mentioned as a compulsory gear in the Celtic Sea mixed trawl fishery if a vessel's catch comprises more than 20% haddock. With limited haddock quota available, it is not profitable for vessels to use this gear to target haddock as a single species. Vessels using trawl gear in the Celtic Sea depend on a variety of mixed fisheries. There are many fishing métiers operating in the Celtic Sea which will also catch cod and whiting, yet this measure applies only to the mixed trawl fishery.

Mentioned gear options for bottom trawls in the Celtic Sea whose catches consist of at least 20% haddock include:

- 110 mm cod end with 120 mm square mesh panel
- 100 mm T90 cod end
- 120 mm cod end
- 100 mm cod end with 160 mm square mesh panel

These gear options have shown in successive trials to be selective¹ and their implementation testifies the effort of the industry towards more sustainable and selective fisheries. Therefore, we suggest that if the raised fishing line for bottom trawls targeting haddock is to be retained, the minimum percentage of haddock in the catch is set at 55%. It remains important for the NWWAC to mention that the difficulty encountered by the implementation of this device lies mainly in the disproportionate nature of this measure compared to the very low yields of cod in the Celtic Sea. Therefore the NWWAC recommends to respect the principle of proportionality when recommending and adopting technical measures.

¹ Supporting information: <https://archimer.ifremer.fr/doc/00677/78882/81169.pdf>





2) 120 mm mesh size

EU Regulation 2019/1241, Annex VI, Part B, section 1.1., states that, “without prejudice to the landing obligation, vessels will use a mesh size of 120mm”, with a footnote that reads: “It should be introduced gradually over a period of two years from the date of entry into force of this Regulation”.

Vessels fishing in ICES 6a currently use a 100 mm mesh, although this includes the use of a 120 mm square mesh device in accordance with the provisions of an internal Spanish regulation which aims at improving selectivity.

In view of the above, it seems that, as of August of 2021, the mesh size will become 120 mm in ICES area 6. A gradual introduction of this 120mm mesh was planned, but we are not aware of anything being done in that regard and we would thus appreciate clarification.

Thank you for your attention on these matters, I am looking forward to your response.

Yours sincerely,

Emiel Brouckaert
Chairman of the Executive Committee

