



Dirk Van Guyze
Chairman NWW MSG
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Dun Laoghaire, 28 June 2022

Dear Mr Van Guyze,

Subject: NWWAC advice on the draft 2022 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 21 June 2022.

The NWWAC notes that broadly seen the draft JR proposes a rollover of the current technical measures for 2023. However, the NWWAC did not get the time to evaluate any technical details of which we have not been informed before receiving this draft JR. Based on earlier information, we wish to emphasise the following points:

- Overall, the NWWAC recommends that, while it is important not to lose measures flexibility and adaptability to the different fleets, stability of technical measures over the years is vital.
- Cod management is one of the most important aspects to consider when discussing technical measures in the Celtic Sea. The STECF 21-18 report mentions a proposal for reducing fishing effort on cod including rolling closures across the Celtic Sea. The NWWAC notes that the ICES stock assessment for Celtic Sea cod is not taking into account important issues such as climate change and rising sea temperatures which are affecting cod survivability. Therefore, the NWWAC recommends conducting research on whether it is physiologically possible for the Celtic Sea cod stock to recover if the environmental conditions are not conducive to successful recruitment. This should provide a valid basis for further recommendations and contribute to the understanding of the future viability of cod fisheries in the Celtic Sea.
- 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. The NWWAC finds 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 respecting the principle of proportionality when recommending and adopting technical measures.





- The UK and EU currently have different technical measures in place and both parties have realised that it is beneficial to reach an agreed approach on TM in the Celtic Sea, which is reflected in commitments made in the past two Written Records of the annual EU-UK fisheries consultations. While acknowledging that progress has been made in the SCF, the NWWAC wishes to highlight the urgency of this matter, as having different measures to comply with when crossing the border between EU and UK waters represents a great concern and difficulty for fishers. Thus, the NWWAC urges the Commission to ensure that measures between EU and UK waters are as cohesive and harmonised as possible. The NWWAC also underlines the vital importance of continued engagement with stakeholders during new bilateral discussions between the EU and UK under the SCF. The newly established “Inter-AC Brexit Forum” has already provided recommendations in this regard, through a [letter from April 2022](#).

To conclude, the NWWAC would like to point out that the tight timeline for provision of AC advice makes it difficult to ensure adequate stakeholder consultation. Close cooperation between the AC and the Regional Member States’ Group is vital for the continual improvement of fisheries management in the North Western Waters. Whilst the Member States Group is developing the Joint Recommendation, the NWWAC greatly appreciates being kept informed of any changes and requests made by the Commission for adjustments, as well as being asked for input where relevant.

Yours sincerely,

Emiel Brouckaert
NWWAC Chairman

