



Dirk Van Guyze  
Chairman NWW MSG  
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Dun Laoghaire, 27 April 2022

Dear Mr Van Guyze,

**Subject: NWWAC advice on the draft 2022 Joint Recommendation Discard Plan for pelagic and demersal fisheries in the North Western Waters**

Thank you for the opportunity to provide feedback on the draft Joint Recommendation Discard Plan for pelagic and demersal fisheries in the North Western Waters 2022. The North Western Waters Advisory Council (NWWAC) welcomes the draft received from your services on 6 April 2022 and the information obtained from the NWW MS Technical Group meetings in March and April, and of the High Level Group meeting on 26 April 2022. However, the NWWAC would like to point out that, similar to previous years, the tight timeline for provision of AC advice makes it difficult to ensure adequate stakeholder consultation.

In general terms the NWWAC is advising to retain the existing exemptions, noting that this should be subject to the relevant supporting information being provided. The AC is aware that the COVID-19 pandemic and the EU-UK negotiations following Brexit have been posing significant challenges to both Member States and scientific institutes to organise the necessary work in preparing the Joint Recommendation (JR). Despite these challenges, the Commission has requested to keep to the timeline so that the regulatory process for having Discard Plans in place by 1 January 2023 remains achievable. In light of this, we encourage the MS and the Commission to consider a flexible approach on the delivery of scientific supporting information for exemptions' requests.

Regarding new exemptions, the NWWAC proposes to add a survivability exemption for sole in ICES division 7e, similarly to the one implemented in 7d.





Overall, the NWWAC reiterates the view expressed in the Choke Advice 2021<sup>1</sup> that priority should be given to measures that aim at avoiding unwanted catches in the first place, according to article 14 of the Common Fisheries Policy.

Moreover, the NWWAC recommends that the NWW Member States Group includes in the JR concrete dispositions and clear instructions on documentation of discards under both de minimis and high survival exemptions to provide for the collection of accurate discard data.

The NWWAC stresses the unprecedented nature of the current post-Brexit situation, where a landing obligation applies in both EU and UK waters. This new context creates uncertainties. The NWWAC therefore underlines the need to seek harmonisation with the UK via the Specialised Fisheries Committee to ensure a level playing field between fishermen on all aspects of the landing obligation.

NWWAC members believe that close cooperation between the AC and the Regional Member States' Group is important for the continual improvement of fisheries management in the North Western Waters, and is needed to fulfil the NWWAC objective to optimise the efficiency of the consultation process, the exchange of ideas and the production of advice. 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  
Chairman of the NWWAC

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<sup>1</sup> <https://www.nwwac.org/publications/nwwac-2021-advice-addressing-choke-risk-in-nww-after-exemptions.3638.html>

