



Dirk Van Guyze
Chairman NWW MSG
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Belgium

Dun Laoghaire, 25 March 2022

Dear Mr Van Guyze,

Subject: NWWAC advice on the draft Joint Recommendation on directed fishing for squid

The North Western Waters Advisory Council (NWWAC) welcomes the information obtained from the NWW MS Technical Group (TG) meetings regarding the 40mm minimum mesh size for directed fishing for squid as listed in Annex VI, Part B of the Technical Measures Regulation. We note that the Member States are preparing a Joint Recommendation on amendments to this listing, including an increase of this minimum mesh size.

The majority of NWWAC members is in favour of such an increase, as this could reduce the unwanted catches of juvenile fish species. Accordingly, there is a wide support for proposals to implement a minimum 80mm mesh size for bottom trawls and seines targeting squid in area 7. However, it was not possible to reach consensus for what concerns the fishery in the West of Scotland area (ICES area 6).

In addition, the NWWAC would like to point at its *Views on and issues with the definition of "directed fishing"*¹, as we consider it important in the implementation of the Technical Measures Regulation that such definitions are generally agreed and this also applies for this specific measure for squid fisheries. The lack of agreement on the conditions that determine the use of the mesh sizes without a directed fishing definition can present a danger, as small mesh sizes may be used for other species. This is relevant as the NWWAC notes that coastal vessels in ICES area 7e are seasonally using pelagic trawls with a 40mm mesh size targeting mackerel. In some cases, this activity results in large bycatches of squid. Without a clear definition of targeted fishing, the proposed Joint Recommendation could unwillingly impact this fleet or any other vessels fishing in similar circumstances.

Accordingly, the NWWAC advises for a joint recommendation by the MSG on an amendment of this reference in EU regulation 1241/2019, Annex VI, Part B, by adding a row to the table containing the minimum mesh size for directed fishing for squid in ICES Area 7.

The NWWAC appreciates the opportunity and underlines the importance of being consulted to evaluate the effects of any proposals to define gears or increase the minimum mesh size.

¹ <https://www.nwwac.org/publications/nwwac-views-on-and-issues-with-the-definition-of-directed-fishing.2959.html>



In this respect we also consider it important to refer at the NWWAC letter² to the Commission of 27 august 2021 in which we highlight the importance of having cohesive and harmonised measures between EU and UK waters.

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

Yours sincerely,

Emiel Brouckaert
Chairman of the NWWAC

² <https://www.nwwac.org/publications/nwwac-letter-to-the-commission-regarding-eu-uk-technical-measures.3489.html>