



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

Dun Laoghaire 9 March 2023

Dear Ms Vitcheva,

**Subject: Management of NWW picked dogfish fishery in 2023**

Following revised and improved scientific advice by ICES, the EU and the UK agreed that the picked dogfish or spurdog (*Squalus acanthias*) stock should no longer be a prohibited species and set TAC and quotas for 2023 and 2024. For EU waters a management principle has been introduced including a deterioration of directed fisheries targeting aggregations of mature females by setting a maximum size of 100 cm. Any catches above that size when caught accidentally shall not be harmed and specimens shall be promptly released back into the sea. As stated in article 59 k of Regulation (EU) 2023/194, this maximum size should cease to apply when a delegated act introducing corresponding measures is implemented. Regarding UK waters, the NWWAC recommends that the EU encourages the UK to quickly introduce its – preferably similar – management principles.

The NWWAC notes that this species is characterized by an aggregative behavior, meaning catches in a single haul can be quite high. Although the TAC and national quota of DGS/15X14 have been set at an acceptable level, the landing obligation could result in operational difficulties to store such a high catch, rendering the intended fishing activities by individual vessels impossible. At the same time, this species has a sufficient level of survivability, also for individuals below 100 cm. Logically, as this TAC agreement was only concluded in December 2022, there is no reference to this stock in the relevant Discard Plans.

While the NWWAC expresses its willingness to collaborate with the Commission and the Member States in relation the development of the delegated act referred to by article 59.k from regulation (EU) 2023/194, in line with the above we advise to urgently start a procedure to add an exemption to the Landing Obligation for this species.

We thank you for your attention to this urgent matter and appreciate the continued collaboration with DG MARE and the NWW Member State Group, which is crucial for our work. We look forward to your confirmation of expeditious address of this advice.

Sincerely,

Emiel Brouckaert  
NWWAC Chairman

