

The targeted consultation on the Multiannual Plans for the North Sea and the Western Waters

The [common fisheries policy \(CFP\) Regulation](#) highlights the importance of establishing multiannual plans (MAPs) reflecting the specific features of the different regions and fisheries, recognising that the objective of sustainable exploitation of marine biological resources is more effectively achieved through a multiannual approach to fisheries management.

Stocks and fisheries are managed by means of such plans, which contain goals for managing fish stocks in line with the CFP objectives (maximum sustainable yield) and measures such as fishing effort restrictions, rules for setting total allowable catches, specific control rules and technical measures (such as specific rules for implementing the landing obligation) and review clauses and safeguards to trigger remedial actions.

Articles 9 and 10 of the CFP Regulation establish the principles, objectives and content of such plans. Currently four MAPs have been adopted under the CFP:

- [Baltic plan](#) (see also the [first implementation report](#));
- [North Sea plan](#);
- [Western Waters plan](#);
- [Western Mediterranean plan](#).

This questionnaire focuses on two MAPs. The North Sea MAP for demersal fish stocks has been applied since 2018. The Western Waters MAP for fisheries comprising both the North and South Western Waters, as well as the waters around Madeira and the Canary Islands, has been applied since 2019.

According to the CFP Regulation, both MAPs aim to ensure the sustainable exploitation of the stocks, by ensuring that they are exploited according to the principles of MSY and of the ecosystem-based approach to fisheries management, as well as the precautionary approach. The MAPs provide stability of fishing opportunities, while ensuring that management is based on the latest scientific information on stocks, mixed fisheries and other aspects of the ecosystem and environment. The MAPs also facilitate the implementation of the landing obligation.

The North Sea and the Western Waters MAPs require the Commission to report on the plans' results and impacts by 6 August 2023 and by 27 March 2024, respectively. However, the two reports will be merged in one with a deadline of 27 March 2024.

In this context, the Commission would like to consult the most relevant stakeholders on their respective assessment of the MAPs performance in meeting their objectives and identifying any weaknesses in design or implementation that undermine their effectiveness.

Who are you?

- North Sea Member States Group (Scheveningen Group)
- North Western Member States Group
- South Western Member States Group
- North Sea Advisory Council
- North Western Advisory Council
- South Western Advisory Council
- Pelagic Advisory Council
- International Council for the Exploration of the Sea
- Scientific, Technical and Economic Committee for Fisheries
- National correspondents and chairs of the Regional Coordination Groups (Data Collection Framework)
- Expert Group for Fisheries and Aquaculture
- Fisheries attachés
- Marine Strategy Framework Directive experts
- Marine expert group
- Long Distance Advisory Council

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North Sea MAP

According to the North Sea MAP, **MSY** was to be achieved for all relevant stocks by 2020. Out of the 11 stocks covered by the MAP, the ICES provides an analytical assessment for 9 stocks. In your opinion:

1. To what extent has the MAP contributed to increase the number of TACs set at MSY?
2. What is the medium to long-term socio-economic impact on the fisheries concerned when a TAC is set at MSY?
3. What change was brought by the establishment of the target fishing mortality (F) that corresponds to the objective of reaching and maintaining MSY as ranges of values, which are consistent with achieving MSY (FMSY)?

very beneficial, beneficial, neutral, negative, very negative, no opinion

On **discards** (unwanted catches that are returned to the sea) and the landing obligation (Article 15 of the CFP Regulation), in your opinion:

1. To what extent discards have been eliminated and the landing obligation has been actually implemented?
2. To what extent has the MAP contributed to achieving the current situation in terms of the elimination of discards and implementation of the landing obligation? More specifically, to what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations
3. What is the impact of the current situation in terms of the elimination of discards and implementation of the landing obligation on the relevant stocks?
4. What is the socio-economic impact of the current situation in terms of the elimination of discards and implementation of the landing obligation on the fisheries concerned?

very beneficial, beneficial, neutral, negative, very negative, no opinion

On the **ecosystem-based approach** to fisheries management, in your opinion:

1. In general, within the context of fisheries management in the North Sea, to what extent has the objective of implementing an ecosystem-based approach, and notably of achieving good environmental status by 2020, been achieved?
2. To what extent has the MAP contributed to the current situation in terms of the ecosystem-based approach?
3. What is the impact of the current situation in terms of the ecosystem-based approach on the relevant stocks?
4. What is the socio-economic impact of the current situation in terms of the ecosystem-based approach on the fisheries concerned?

very beneficial, beneficial, neutral, negative, very negative, no opinion

In your opinion, to what extent has the MAP strengthened **regional cooperation** on the proposal of **conservation measures** through the submission of joint recommendations, including with stakeholders?

very beneficial, beneficial, neutral, negative, very negative, no opinion

Are there any **additional measures** that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?

very beneficial, beneficial, neutral, negative, very negative, no opinion



Western Waters MAP

According to the Western Waters MAP, **MSY** was to be achieved for all relevant stocks by 2020. In your opinion:

1. To what extent has the MAP contributed to increase the number of TACs set at MSY?
2. What is the medium to long-term socio-economic impact on the fisheries concerned when a TAC is set at MSY?
3. What change was brought by the establishment of the target fishing mortality (F) that corresponds to the objective of reaching and maintaining MSY as ranges of values which are consistent with achieving MSY (FMSY)?

very beneficial, beneficial, neutral, negative, very negative, no opinion

The NWWAC recognises and welcomes the long-term progress made overall towards more sustainable EU fisheries reflected in the Commission's Communication COM(2022)253. This is especially true in the Northeast Atlantic EU waters, where "thanks to the efforts made by the sector, in 2020 the overall fishing mortality ratio fell below 1 for the first time". Overall, the NWWAC notes that for all the NWW stocks the FMSY has been the reference for setting TACs & quotas.

By defining ranges of fishing mortality based on the best available scientific advice, the Western Waters Multi-Annual Plan (WW MAP) allows a certain flexibility in setting fishing opportunities. However, the NWWAC notes that the FMSY ranges provided by the MAP have not been put into use in TAC & quota setting for NWW stocks.

Moreover, ICES has not been requested to assess under which conditions Article 4.5 a and b could apply, regarding the setting of fishing opportunities for a stock in accordance with the upper range of FMSY available.

The NWWAC agrees that while the NWW MAP can help clarify how MSY is to be implemented as a management objective, the list of targeted stocks included in the plan is too rigid and with no clear criteria on what constitutes a target stock. A clear example in the NWW is pollack in area 7, which is not a targeted species and for which scientific information is insufficient to provide MSY advice.

Another limitation of the MAP is the lack of measures to be taken when a stock falls below Blim, other than following the ICES advice for zero catch. This needs to be addressed urgently through the development of rebuilding plans with clear targets and timeframes for stocks below Blim based on best available scientific advice.

On **discards** (unwanted catches that are returned to the sea) and the **landing obligation** (Article 15 of the CFP Regulation), in your opinion:

1. To what extent discards have been eliminated and the landing obligation has been actually implemented?
2. To what extent has the MAP contributed to achieving the current situation in terms of the elimination of discards and implementation of the landing obligation? More specifically, to what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?

3. What is the impact of the current situation in terms of the elimination of discards and implementation of the landing obligation on the relevant stocks?
4. What is the socio-economic impact of the current situation in terms of the elimination of discards and implementation of the landing obligation on the fisheries concerned?

very beneficial, beneficial, neutral, negative, very negative, no opinion

With the full implementation of the landing obligation, significant progress has been made in advancing the understanding of chokes, and several measures have been identified, including technical gear modifications and avoidance measures informed by advanced knowledge on the spatial distributions of choke species and unwanted catches.

However, avoiding choke issues, and thus a premature closing of a fishery, remains one of the biggest challenges in the mixed and dynamic NWW fisheries. This is explained in detail in the NWWAC advice “Addressing choke risk in the NWW after exemptions” submitted on 9 December 2022. As mentioned in the advice, it remains clear that the implementation of the CFP in a mixed fisheries context requires creative and innovative solutions involving spatial management, technical measures, and in some cases balancing short- and long-term socio-economic trade-offs.

In this regard, the NWWAC welcomes the focus on avoidance of unwanted catches characterising Article 3.2 of the WW MAP. Indeed, frequently the AC has stipulated that avoidance and minimisation of unwanted catches are baseline tools to achieve the selectivity objective. For this reason, it is important to emphasise the role of Article 14 of the CFP, whereby Member States may conduct pilot projects with the aim of fully exploring all practicable methods for the avoidance, minimisation and elimination of unwanted catches in a fishery. This has incentivized research on more selective fishing methods and promoted the prioritization of measures which minimise the amount of unwanted catches, ensuring survivability of fish escaping the net. The NWWAC believes that, in order to improve the practical implementation of the landing obligation, avoidance and minimisation of unwanted catches should be better incentivised and that more achievable objectives should be fixed, recognising stocks and individual fisheries’ peculiarities.

The NWWAC acknowledges that the flexibility in TAC setting afforded by the implementation of FMSY ranges would represent a relevant element in the implementation of the landing obligation. However, it is important to take into account the implications of using FMSY ranges provided for by the WW MAP in a mixed fisheries context. The additional flexibility provided by these ranges for a stock may be constrained by other, more limiting stocks. Indeed, it is already apparent that the zero-catch advice for several stocks continues to pose significant challenges this year

On the **ecosystem-based approach** to fisheries management, in your opinion:

1. In general, within the context of fisheries management in the Western Waters, to what extent has the objective of implementing an ecosystem-based approach, and notably of achieving good environmental status by 2020, been achieved?
2. To what extent has the MAP contributed to the current situation in terms of the ecosystem-based approach?
3. What is the impact of the current situation in terms of the ecosystem-based approach on the relevant stocks?
4. What is the socio-economic impact of the current situation in terms of the ecosystem-based approach on the fisheries concerned?

very beneficial, beneficial, neutral, negative, very negative, no opinion

Article 3.3 of the WW MAP states that “The plan shall implement the ecosystem-based approach to fisheries management in order to ensure that negative impacts of fishing activities on the marine ecosystem are minimized”. NWWAC members believe that MAPs could be an opportunity to allow for ecosystem-based measures to be implemented at the scale of a regional basin. However, two important aspects need to be considered:

1) The concept of ecosystem-based approach to fisheries management embeds all three pillars of sustainability - environment, social responsibility, and economic – and this should be accounted for in the MAPs. Indeed, according to the Food and Agriculture Organisation of the United Nations, “the purpose of an ecosystem approach to fisheries is to plan, develop and manage fisheries in a manner that addresses the multiple needs and desires of societies, without jeopardizing the options for future generations to benefit from the full range of goods and services provided by marine ecosystems” . In order to effectively implement the CFP, the NWWAC believes that the socio-economic dimension of the policy should be strengthened and wishes to point out the importance of CFP article 2.1, which at all times should be taken into account when vetting any management measure.

2) When considering the impacts on the marine ecosystem, the MAP should not only take into consideration fishing pressure on fish stocks but adopt a holistic approach considering impacts from all the pressures on the marine environment (climate change, pollution and other anthropogenic impacts). The need for more flexibility in the implementation of the WW MAP is also justified to ensure an adaptive management of NWW fisheries, which are highly dynamic and currently subject to ecosystem changes which can result in distributional shifts in fish species. Changes in stock biology and natural phenomena, such as recruitment pulses prevalent in gadoid species, may create choke situations not originally forecast. In light of this, modifications to the targeted species list should be allowed with clear conditions and criteria establishing why a stock should be listed as a target species. This approach would allow accounting for not only the impacts of environmental variables, and thus make fisheries management more resilient and adaptive to climate change, but also for changes in food production requirements.

Furthermore, the NWWAC notes the importance of implementing FMSY ranges if scientific advisory bodies are to integrate the ecosystem indicators to adjust the target fishing mortality, for example as suggested by ICES WKIRISH.

In your opinion, to what extent has the MAP strengthened **regional cooperation** on the proposal of **conservation measures** through the submission of joint recommendations, including with stakeholders?

very beneficial, beneficial, neutral, negative, very negative, no opinion

The NWWAC recognises the role of the WW MAP in providing the framework for Member States having a direct interest in the NWW to cooperate among themselves at the level of the regional sea basin through the submission of joint recommendations. Accordingly, the NWWAC regularly provides advice on joint recommendations produced by the NWW MS Group on technical measures and discard plans in the NWW. In this regard, the NWWAC emphasises the continued need for good communication and recommends strengthening collaboration between the Member States and the AC.

The scope of the WW MAP is very wide covering a large area encompassing North Western Waters, South Western Waters and CECAF zones around Madeira and the Canary Islands. These areas include a wide range of diverse fisheries and cover most of the demersal stocks and deep-sea stocks. By combining the areas and stocks into one plan, it moves away from the regional definitions included in Article 4 paragraph 2 of the Basic Regulation (i.e. there is no differentiation between the NWW and SWW). It also does not acknowledge the differences in the stocks and fisheries considered by the NWWAC and SWWAC.

Furthermore, the NWWAC notes there are overlaps for several stocks included in this plan with the North Sea MAP. For instance, megrim in divisions 4a and 6 and hake in subareas 4, 6, and 7 are included in the WW MAP, whilst other stocks such as haddock and saithe in divisions 4 and 6a, as well as Anglerfish in subareas 4 and 6 are included in the NSMAP. This overlapping creates management difficulties and complicates regional cooperation, while MAPs' scopes should coincide with the regional structure established in the CFP.

The NWWAC also wishes to point out that its remit area includes four different subregions, each with specific characteristics, issues and needs in terms of fisheries management, ecosystem dynamics and socio-economic aspects. Having different MAPs for West of Scotland, Irish Sea, English Channel and Celtic Sea could be a further step in the regionalisation approach strengthening fisheries management.

Are there any **additional measures** that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?

very beneficial, beneficial, neutral, negative, very negative, no opinion

In relation to Article 3.4 a and b, the NWWAC refers to its joint advice with the North Sea Advisory Council on the MSFD review from 22 March 2022, which contains recommendations aiming at ensuring that the MSFD descriptors are measurable and regionally coherent in their progress towards GES, that measures are effective and their impact quantified, and coordination within and across marine regions improved. Regarding Article 3.5, the NWWAC invites the Commission to reflect on the definition and criteria of "best available scientific advice", to ensure this provides the most accurate stock assessment. The NWWAC also recommends following the developments of the application of the Management Strategy Evaluation, which is becoming an increasingly popular tool for developing, testing, and implementing fisheries management regimes, utilizing participatory modelling.

Contact

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