

Mr Fabrizio Donatella  
Director MARE.C  
European Commission  
Jozef II-straat 99  
1000 Brussels  
Belgium

Dun Laoghaire, 9 March 2023

Dear Mr Donatella,

**Subject: Targeted consultation on the Multiannual Plans for the North Sea and the Western Waters**

The North Western Waters Advisory Council (NWWAC) welcomes the letter received on 18 January 2023 consulting AC members on their assessment of the Western Waters Multiannual Plan (WW MAP) performance in meeting its objectives and identifying any weaknesses that undermine its effectiveness.

Following instructions, the NWWAC has provided its response to the targeted online survey. However, members felt that an official reply to your letter should also be submitted, allowing for reflection on a number of overarching aspects setting the context for the questionnaire exercise. The response to the online survey is also attached to this communication for completeness of information.

The NWWAC agrees with the principle that MAPs should offer a legislative basis to manage certain fisheries targeted by the plan (mainly the most important ones commercially) in a dedicated sea basin in the long term. Management measures include mainly MSY ranges, implementation of the landing obligation and technical measures. For the NWWAC, the added value of the MAPs would be to provide regional long-term ecosystem-based management of those fisheries that allow for stability, visibility and flexibility for the stakeholders concerned. Whereas that is a very virtuous principle, it seems that, in practice, the full ambition of the Western Waters MAP is not achieved. Focus appears to be TACs & quotas management and on delegated acts for the implementation of the Landing Obligation. As the NWWAC agrees with the principle of the MAPs, we recommend investigating how to use their full potential.

Another important aspect to consider relates to the post-Brexit landscape, which cannot be ignored when reflecting on the effectiveness of the WW MAP. As a consequence of Brexit, the dynamics in terms of achieving sustainable fishing have inevitably changed. EU-UK bilateral consultations have become a key step towards setting Fishing Opportunities for the 75 shared fish stocks, whose majority are in the North Western Waters. It is also important to note that the UK has not transposed the MAP nor the MSY objective in its national regulations. Thus, it would be desirable to consider measures in the MAP evaluation which integrate EU and UK fisheries management. Therefore, the NWWAC wishes to point out that the reporting exercise on the implementation of the WW MAP should not be done in isolation but should take the Trade and Cooperation Agreement into account.



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A final point relates to the consultation process for this reporting exercise. The NWWAC would like to point out that this exercise relates to complex matters, as demonstrated by the questions included in the survey, and thus requires time and focus to be properly addressed. The AC would like to recall that all its advice aims to make submissions that are based on consensus. To reach this, all AC members need to be consulted in a thorough and appropriate manner, which takes time. Therefore, the NWWAC would appreciate to be given more time for considerations, especially of complex issues such as this.

Thank you for your attention on this matter. We remain at your disposal to further elaborate on this exercise should this be necessary.

Yours sincerely,



Emiel Brouckaert  
NWWAC Chairman



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