



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/C.5/NG/ac

Dear Mr Emiel Brouckaert,

Thank you for the letter of the Northwestern Waters Advisory Council (NWWAC) of 8 December 2023, regarding two issues raised during the “*NWWAC workshop on the management of the hake northern stock*” on 06 June 2023. In brief, those issues relate to the proportion of juvenile hake caught as bycatch using 100 mm or 120 mm mesh sizes in hake targeted fisheries in ICES area 7, together with the complexity and difficulty in applying the Technical Measures Regulation (TMR) in terms of catch composition that might require vessels to adapt their fishing patterns.

In this context, the NWWAC asked the Commission to consider requesting ICES to analyse the impact of using 100 mm and 120 mm mesh sizes on the hake stock, as well as to perform ecological and socio-economic evaluations of the derogations currently in place before considering any changes to the TMR.

Regarding the first issue on the use of 100 mm *vs.* 120 mm mesh sizes in the gillnet fishery targeting hake, we would like to recall the previous evaluation on “hake selectivity in gillnet fisheries” provided in the final report of the plenary meeting (PLEN-07-03) of the Scientific, Technical and Economic Committee for Fisheries (STECF). According to the STECF, corroborating the NWWAC remark that the 120 mm mesh captures proportionally more juveniles, the length-frequency distributions of the catches revealed that the 120 mm mesh retains proportionally more ‘small’ hakes compared to the 100 mm mesh.

However, in absolute terms, besides an overall catch reduction across all length classes using the larger mesh size, the catch rates of the 120 mm nets are reduced to at least one third of those recorded with the 100 mm nets. In practice, such selectivity is length-dependent for larger fish, whereas for smaller fish it seems to be length-independent and to occur due to small hake that gets entangled by their teeth in the gillnets.

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In your letter, the NWWAC recommends the Commission to address this issue by requesting the ICES to analyse the impact of using 100 mm or 120 mm mesh sizes on the hake stock. Alternatively, considering the STECF remarks about the need of information on the gillnets design and construction, as well as insufficient information to validate the results obtained in gillnet selectivity trials and to perform a proper selectivity analysis, we would instead suggest that the regionalisation process within the Common Fisheries Policy (CFP) is the tool that should be used to discuss potential amendments to the TMR.

In this context, the Commission encourages the NWWAC to articulate and engage on this subject with the NWW Member States Regional Group, and in case both regional bodies understand that now they already have more detailed information / data to underpin this request, they would be able to submit a joint recommendation to the Commission for an updated evaluation of this matter by the STECF. However, given the previous assessment by the STECF, any reduction in mesh size would likely constitute a weakening of the selective properties of gillnets. This would likely not be in accordance with the provisions in the TMR, where any modification must be at least as selective as the gears set out in the respective regional annex. Any such proposal must also be accompanied by scientific evidence that demonstrates that the minimal condition of equivalence is met.

It should be recalled that such request would only cover EU waters. It should not be assumed that the UK would support a similar reduction in gillnets mesh size in the fishery targeting hake in UK waters.

Finally, please rest assured that we will continue to follow any eventual developments on this issue, facilitating the discussions and participating in technical meetings as necessary.

I am looking forward to our continued and fruitful cooperation. Should you have any questions on this reply, please contact Mr Norman Graham (Norman.GRAHAM@ec.europa.eu) and Ms Julia Rubeck, coordinator for the Advisory Councils (functional mailbox: MARE-AC@ec.europa.eu).

Yours sincerely,

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