

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

Dun Laoghaire, 3 May 2024

Dear Ms Vitcheva,

Subject: NWWAC advice on Technical Measures in the Celtic Sea

The North Western Waters Advisory Council (NWWAC) acknowledges that at the last Inter-AC Brexit Forum on 5 February and at the Inter-AC meeting on 6 February, the Commission highlighted the pressing need to address the effectiveness of remedial measures for cod and whiting in the Celtic Sea. The NWWAC appreciates that the EU is committed to work with the UK in the Specialised Committee on Fisheries (SCF) as a priority topic in 2024. It is the AC understanding that the two parties will be looking at effectiveness of remedial measures, both spatial and gear-based, for cod and whiting in the Celtic Sea aiming for a level playing field. Similar work is planned for whiting in the Irish Sea.

While it is still unclear how the regionalisation process will feed into this work and if regional MS Groups will be requested to produce joint recommendations, the NWWAC welcomes your invitation to get involved and contribute to this work as communicated during the abovementioned Inter-AC meeting.

NWWAC members had the opportunity to discuss this topic at its last plenary meetings in March. Inputs from these discussions produced the following recommendations and requests:

- In its letter from July 2022, referring to the STECF 21-18 report which only took into account EU waters, the NWWAC noted that the report on the UK remit area of the Celtic Seas assessing technical measures had not been published yet. The AC requested this report to be shared with stakeholders once published, to ensure that future discussions on the matter are fully supported by complete information. It is our understanding that the data collection exercise has been carried out. However, the NWWAC has not received any information. The AC emphasizes the importance of receiving the most recent scientific data on technical measures in the Celtic Sea to ensure informed discussions and the development of effective management advice.
- Considering the decrease in the number of vessels active in the Celtic Sea post-Brexit¹, as well as the most recent advice from ICES, the NWWAC urges the Commission to take into account

¹ Please see figures in the Appendix below



the evolving fisheries landscape in its deliberations on technical measures. It is also important to consider the sidelined and tied up vessels in ports, awaiting sale, which represent a significant yet unrecorded aspect. It is crucial to assess how these changes impact the effectiveness and necessity of existing measures.

- Catch and discard figures should be analysed using the most up to date data, considering both the decrease of fishing vessels operating in the Celtic Sea and the several modifications of the technical measures' framework. It should be noted that if in 2021, according to ICES, the total catches (1360 t) for cod were substantially above the level of the bycatch TAC (644 t), it is no longer the situation in 2022, with 648 t caught and the same level of bycatch TAC. This situation should be confirmed and even enhanced for 2023. According to preliminary data, Irish and French landings combined have decreased substantially, from 485 t in 2022 to 371 t in 2023 (-24%).

NWWAC members concur that seasonal closures and additional technical measures are not necessary in the Celtic Sea. As already stated in previous AC advice, the effectiveness of selectivity measures already in place should be evaluated before new ones are introduced. In that sense, special attention should be paid to the results of the ongoing work that is realized by the STECF regarding selectivity indicators. As clearly stated by STECF during its 2023 winter plenary, *“According to the ad-hoc report, all three selectivity indicators are considered to show improving selectivity for this stock”*. In certain cases, selectivity efforts have already reached their maximum and increasing selectivity would mean closing a fishery. Moreover, it is also important to consider that the health of certain stocks might be affected by other factors than fishing, such as pollution and climate change. Instead, the NWWAC points out that rules governing fisheries operations in the region should be simplified to enhance clarity and compliance. Complex regulations can lead to misunderstandings and hinder effective enforcement. The NWWAC urges the Commission to facilitate dialogue among Member States to ensure consistent interpretation and enforcement of regulations, thereby promoting a level playing field for all stakeholders.

Moreover, the NWWAC takes the opportunity to announce the organisation of a webinar on the impacts of climate change on scientific assessments for Celtic Sea cod. Cod management is considered as one of the most important aspects when discussing technical measures in the Celtic Sea. As the NWWAC has already highlighted in previous advice², the ICES stock assessment for Celtic Sea cod is not referring to important issues such as rising sea temperatures. Thus, the aim of this webinar will be to gather all the relevant experts to develop a knowledge base that can help addressing the lack of operational understanding about the effects of climate change on cod survivability and ultimately on the future viability of cod fisheries in the Celtic Sea. The webinar is planned in June, more information will be shared soon.

² [NWWAC letter to DG MARE on climate change implications in the scientific assessment for cod stocks in the Celtic Seas ecoregion](#) and [NWWAC advice on Technical Measures in the Celtic Sea](#)

The NWWAC stands ready to contribute to the ongoing discussions on technical measures in the Celtic Sea and welcomes the opportunity to collaborate with the DG MARE and the NWW Member States in developing effective and sustainable management strategies. Thank you for your attention to this matter. We are looking forward to your response.

Yours sincerely,



Emiel Brouckaert
NWWAC Chairman



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Appendix – Vessels decommissioned in 2023 in POs active in the Celtic Sea from NWWAC membership

Producer Organisation	Vessels decommissioned
Rederscentrale (BE)	1
Les Pêcheurs de Bretagne (FR)	23
Cobrenord (FR)	5
Irish South and West Producer Organisation (IE)	40
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