

## **Joint NWWAC/NSAC response to the**

### **UK Consultation on the proposed Southern North Sea and Channel Skates and Rays Fisheries Management Plan**

Approved on 07 January 2025 by the Executive Committees of the North Western Waters AC and North Sea AC

#### **Q1. Do you have any comments on the engagement process for developing this FMP? See FMP engagement report for details.**

Since skates and rays are shared stocks between the EU and UK and are therefore subject to the Trade & Cooperation Agreement, the NWWAC welcomes close cooperation between the parties regarding proposed management measures with the inclusion of all stakeholders. It is in the interest of all parties to optimise the management of these stocks and specifically the recent efforts to arrive at individual stock catch advice.

#### **Q2: Do you have any comments on the evidence used in the draft FMP?**

The NWWAC would like to point out that the value of different species has been estimated for the UK market only; however, ray fishing is not exclusive to UK vessels but also involves EU vessels. Why are the value and quantity of catches from EU vessels not being taken into account?

During the development of the FMP, UK stakeholders apparently indicated that there are two stocks of concern in terms of sustainability, namely the spotted ray in 4c and the undulate ray in 7d,e. Members would like to request additional information regarding the UK's specific concerns related to these two stocks and how they were assessed.

Finally, the AC would like clarification regarding the flexibility to add more ray species if they are found to exist within the geographical area that defines the FMP.

#### **Q3: Do you have any comments on the goals in the draft FMP?**

The AC strongly believes that effective management of skates and rays in the southern North Sea and English Channel should be carried out in partnership with the European Union and indeed this is referred to in the consultation. The AC feels that clarification is needed regarding what benchmark would be used to evaluate the restoration of a ray stock, and what is meant by the wider impacts of skate and ray fishing.

The NWWAC believes that it is important to develop social and economic objectives as well under the FMP in order to establish a balance with environmental goals. The NWWAC would welcome the opportunity to participate in the rays and skates management group possibly through collaboration with its own Focus Group Skates & Rays which was established jointly with the North Sea Advisory Council in 2020 and held a successful workshop in 2023 with the involvement of representatives from UK producer organisations ([link](#)).

#### **Q4: Do you have any comments on the measures and actions in the draft FMP?**

Among the proposals is the idea of seasonal and spatial closures. The NWWAC cannot support the implementation of seasonal and spatial closures. Firstly, it is essential to gather more scientific knowledge about skates and ray distribution and migration patterns in order to design outlines for seasonal and spatial closures. Secondly, skates and rays are considered to have a high survival rate after being caught (see also the argumentation for the exemption to the landing obligation for skates and rays). Therefore, the AC deems seasonal and spatial closures to be sub-optimal measures and only a last resort. Challenges around spatial planning are increasing and MPAs and/or RTCs for skates/rays would only contribute to this. The AC would propose to prioritise the work on measures like the MCRS and have this fully and effectively implemented.

During the review of the consultation documents a query arose regarding the request to define the support measures for the fishing sector. The AC would appreciate clarification as to what this exactly refers to.

The consideration of implementing a Minimum Conservation Reference Sizes (MCRS) in the FMP can be supported by this AC as MCRS can be found in EU fisheries as well, for example in the Dutch fisheries a MCRS of 55cm (whole ray) is used and widely supported by fishers.

The AC cannot support the implementation of a Maximum Conservation Reference Size (MaxCRS) as it is not described what the MaxCRS in cm might be. The exact MaxCRS in cm should be investigated and determined first based on best available scientific knowledge, before this measure could be supported. Concern exists regarding its practicality as a MaxCRS will bring extensive limitations to fishing opportunities and utilization of quota, and discards of large skates/rays. Given the technical challenges in selectively avoiding larger individuals, this measure could impose additional burdens on fishers. Moreover, since seasonal closures are already being introduced to protect key breeding and juvenile assemblages, the AC questions the necessity of adding MaxCRS protections, which might create redundant management layers without clear additional benefits.

Finally, the NWWAC would like to know if EU stakeholders will have any place in the fisheries management partnership.

The NWWAC would like to draw attention to its ongoing work in collaboration with the North Sea AC on the management of skates and rays, in particular the workshop that was carried out with participation from UK stakeholders in February 2023 ([link](#)).

**Q5: Would you support the introduction of a MCRS (Minimum Conservation Reference Size) for some or all of the stocks covered in the FMP?**

The introduction of an MCRS should be based on scientific studies. Without scientific evidence, it will be difficult to assess the effectiveness of such a measure. AC members support the idea of an MCRS to protect juvenile skates and rays, as it aligns with the goal of stock health and population growth. However, it is essential that MCRS implementation remains practical and feasible for fishers. Measures that are too complex may impact operational efficiency.

There are de facto minimum sizes in most ray fisheries which relate to marketing. However, the scientific institutes would be better placed to advise on minimum size at maturity (male and female) which, in some cases, might be used for stock protection.

In this context, please note particularly the NWWAC/NSAC letter to the European Commission on TAC setting for skates & rays from 03 April 2024 ([link](#)), and the NWWAC/NSAC advice to the European Commission on skates & rays management from 02 May 2023 ([link](#)).

**Q6: Do you have any additional comments on the draft FMP?**

It is important to consider the socio-economic impacts of implementing new management measures. Sustainable fishing depends on balancing social, economic, and environmental aspects. All three elements must be in equilibrium.

The NWWAC recommends that work on the management of skates and rays involve stakeholders directly and not be carried out in isolation by each party. Discussion must be held at stakeholder level in order to develop meaningful changes for which practical implementation can be realised at sea.

In this context, we question the interest of the measures taken in November concerning the undulate ray in 7d,e while the consultation process of this FMP is not yet complete.