

NWWAC RESPONSE

Consultation of the European Commission, Belgium, the Netherlands, Germany and the NWWAC under article 20 of the Regulation (EU) 1380/2013 on Fisheries management measures within the 12 nautical miles zone of France in the “Ridens et dunes hydrauliques du détroit du Pas-de-Calais” Natura 2000 site

26 January 2026

Background

The North Western Waters Advisory Council (NWWAC) welcomes the opportunity to be involved in, and to respond to, the consultation entitled “*Fisheries management measures within the 12 nautical mile zone of France in the Natura 2000 site ‘Ridens et dunes hydrauliques du détroit du Pas-de-Calais’*” carried out by the Direction Générale des Affaires Maritimes, de la Pêche et de l’Aquaculture (Directorate-General for Maritime Affairs, Fisheries and Aquaculture) of the French *Ministère de la Transition écologique, de la Biodiversité, de la Forêt, de la Mer et de la Pêche* (Ministry for Ecological Transition, Biodiversity, Forests, the Sea and Fisheries).

On 26 November 2025, the NWWAC Secretariat was contacted by email by a representative of the Directorate-General for Maritime Affairs, Fisheries and Aquaculture, inviting the AC to participate in the consultation process, in accordance with Article 20 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy.

The NWWAC Secretariat circulated this information to the members of Working Group 3 English Channel and launched a call for expressions of interest to establish an Advice Drafting Group (ADG) tasked with developing advice in response to the consultation. Following this call, the ADG was established and the following recommendations were developed and approved in accordance with the NWWAC Rules of Procedure.

NWWAC Recommendations

Paragraph 6.3. of the Consultation document – Prohibited gears in area 3 – “Circalittoral rock and boulder triangle” (30 km²):

1. The NWWAC seeks clarification on the definition of mobile bottom-contacting gears exerting a pressure greater than 10 mbar and requests further information on how this relates to the Ifremer abrasion index calculations¹. The NWWAC also requests that the French Directorate-

¹ The term “Ifremer abrasion index” mentioned in the consultation document does not seem to correspond to a single official regulatory document published by Ifremer. Rather, it likely refers to scientific indicators developed by Ifremer or based on Ifremer data to estimate the physical impact of mobile bottom-contacting fishing gears on the seabed. These indicators are commonly calculated using parameters such as gear type, swept area, vessel speed, fishing duration, and VMS/logbook data. Similar methodologies are used in ICES technical guidelines to assess seabed

General for Maritime Affairs, Fisheries and Aquaculture provide details on how the competent authorities would enforce and monitor compliance with this measure.

Paragraph 7 of the Consultation document – Non-discrimination

2. The NWWAC notes that the consultation document does not refer to any socio-economic analysis undertaken to assess the social and economic impacts of the proposed measures on the fishing sector. Measures aimed at ecological sustainability should not come at the expense of social and economic sustainability, nor undermine food security, and a balanced approach between environmental objectives, viable fishing communities and the continued supply of sustainably sourced seafood must be ensured. The NWWAC therefore recommends that the French Directorate-General for Maritime Affairs, Fisheries and Aquaculture carry out a comprehensive socio-economic analysis in order to collect relevant data and information on the potential impacts on the European fishing fleet and the associated socio-economic costs.
3. The NWWAC considers that the information provided is insufficient to demonstrate that the proposed measures are applied in a non-discriminatory manner to all fishing vessels. To ensure fairness and transparency, the NWWAC recommends that the French authorities develop a comprehensive map of fishing effort over the past five years, detailing all fleets and gear types operating in the area. Such a map would allow verification that the measures do not disproportionately impact non-French vessels and would provide an objective basis to confirm that the conservation measures are applied solely for ecological reasons, rather than inadvertently favouring local fleets.
4. The NWWAC considers that the current analysis of fishing effort for foreign vessels in the Ridens area limited to the 2023–2024 period, is too short to provide a robust understanding of potential impacts. The NWWAC recommends that the analysis be extended to cover at least the past five years, in order to account for inter-annual variations in quotas, seasonal closures, and other factors influencing fishing patterns. This longer-term perspective is essential to ensure that conclusions are based on representative trends rather than short-term anomalies.
5. The NWWAC stresses that the analysis should comprehensively assess spatial developments and potential displacement effects, as well as cumulative impacts affecting fishing activity in and around the Ridens et dunes hydrauliques du détroit du Pas-de-Calais area. This should include offshore renewable energy (ORE) developments, the significant increase in Real-Time Closures, seasonal closures, shipping lanes and other competing uses of maritime space. The cumulative loss of accessible fishing grounds risks concentrating fishing activities in increasingly limited areas, potentially increasing operational and safety risks at sea. The analysis should also consider displacement effects and cumulative impacts arising from adjacent Marine Protected Areas, including those already designated in UK

pressure and fishing impact. The NWWAC would like to seek clarification on the exact definition of the abrasion index, methodology, or document being applied in the consultation.

waters as well as those planned. This comprehensive approach would provide a more accurate and fair assessment of the potential effects of the proposed measures on foreign fleets.

6. Concerning the statement that “This analysis took into account fishing effort from all fishing gears combined, including pelagic gears, which will not be impacted by these measures”, the NWWAC notes that vessels using pelagic gears may also be affected. However, this issue falls outside the remit of the NWWAC and is within the scope of the Pelagic Advisory Council.

The NWWAC expresses its sincere thanks to the French Directorate-General for Maritime Affairs, Fisheries and Aquaculture for involving the AC in the consultation process and reiterates its full commitment and availability to provide any further input if required.

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