

Ms Charlina Vitcheva
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European Commission
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Belgium

Cc: North Western Waters Member States Group
Cc: Scheveningen Group

Dun Laoghaire, Brussels, 28 October 2025
NSAC reference: 21-2425

Dear Ms Vitcheva,

Subject: NWWAC/NSAC advice on skates and rays management

Executive Summary

Skate and ray fisheries are important for several Member States as both targeted and by-catch fisheries. The advice follows multiple submissions, ongoing research, and two stakeholder-led workshops on skates and rays management. A key development has been the harmonisation of the Total Allowable Catch (TAC) setting method between the EU and the UK since the UK's exit.

Key Concerns and Challenges

- **One-Size-Fits-All Approach:** The current group TAC setting approach is considered unsuitable because the life histories of different elasmobranch species can vary greatly.
- **Management Mismatches:** The mixture of management units and biological stock units is a significant barrier to progress.
- **Data Limitations:** Limited data availability for certain species, such as blonde ray, has led to management advice based on average landings with precautionary reductions, drastically lowering the current advice level compared to the original.

Core Recommendations

The recommendations are based on a stakeholder workshop held in September 2025:

- **Adjustments to Group TAC Setting:** NWWAC and NSAC recommendations are made on topics including phased removal, candidate species for removal, choke analysis, and alternative TAC system.



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- **Scientific Review and Data Improvement:** NWWAC and NSAC recommendation address ICES Reviews, allocation reference, as well as tracking of year classes.
- **Collaboration and Harmonisation:** NWWAC and NSAC recommendations focus on fisher involvement, UK harmonisation, and also address the use of AI Tools.

Overall, the Advisory Councils caution against a rushed approach and emphasise the importance of stakeholder involvement at all levels.

Background

Skate and ray fisheries constitute important targeted and by-catch fisheries for several Member States. The management of these fisheries has been subject to ongoing research and review across the various EU institutions over the past years including requests to the STECF to evaluate possible management approaches and changes to TAC calculation (STECF 15-01), and also to comment on a possible bycatch provision for undulate ray (*Raja undulata*) (STECF 15-03).

In 2017 the Commission received advice on skates and rays management¹ from the North-Western Waters Advisory Council (NWWAC) suggesting several alternative management measures and requesting their review by STECF. DG MARE organised a seminar with fishers, scientists, national administrations and other stakeholders addressing this advice and assisting in drafting terms of reference for an STECF Expert Working Group (the EWG 17-10). The work of the EWG and STECF plenary resulted in the 2017 STECF report on long-term management of skates and rays (STECF-17-16). Since 2019, both NWWAC and NSAC have provided multiple submissions on best practices for the management of skates and rays. This includes:

- 2019: Best practices for Avoidance, Selectivity, and Survival of Skates and Rays, submitted to the Scheveningen Regional Group ([link](#))
- 2019: NWWAC Advice on the Programme of Measures for Skates and Rays ([link](#))
- 2020: Response to the Scheveningen Group request for guidelines on best practices for handling catches of skates and rays in the North Sea and Skagerrak ([link](#))
- 2020: NWWAC Advice on skates & rays ([link](#))
- 2021: Joint NSAC/NWWAC response to the Scheveningen Group on best practice measures for managing skates and rays in the North Western Waters and the North Sea ([link](#))
- 2021: NWWAC Advice on best practice measures for the management of skates and rays in the North Western Waters ([link](#))

¹ <https://www.nwwac.org/publications/nwwac-recommendations-on-management-strategies-for-skates-and-rays.2258.html>

- 2021: Joint NWWAC/NSAC request for updated scientific information on skates and rays ([link](#))
- 2022: NWWAC Advice on best practice measures for the management of skates and rays in the North Western Waters and the North Sea ([link](#))
- 2022: Joint NWWAC/NSAC Request for harmonisation of skates and rays identification guides on an EU wide basis ([link](#))
- 2023: NWWAC/NSAC advice on skates & rays management ([link](#))
- 2024: NWWAC/NSAC letter on TAC setting for skates & rays ([link](#))

Additionally, several submissions have been made regarding the Prohibited Species List.²

Since then, studies and trials have been and are being carried out regarding the management of skates and rays³. In addition, the International Council for the Exploration of the Sea (ICES) publishes skate and ray advice usually on a two-year cycle. Assessments are carried out on stocks and fisheries from the Arctic to the Azores by the ICES working Group on Elasmobranch Fishes (WGEF). In 2020, ICES organized the first workshop on the use of surveys for stock assessment and reference points for rays and skates (WKSKATE), laying the groundwork for improved use of survey data in assessments of skate and ray stocks. This was followed by three consecutive benchmark assessments in 2022, 2023, and 2024. These benchmarks resulted in the upgrade of eight stocks to an ICES Category 2 assessment, allowing stocks to be assessed relative to (proxy) reference points. In 2024, the ICES WGEF published its latest scientific report on elasmobranch stocks ([link](#)) and held a second WKSKATE workshop in April 2025, which further explored and evaluated the methods to analyse fishery dependent and independent surveys for assessing the status of skate and ray stocks.

The political landscape changed considerably with the UK's full exit on 01 January 2021, which has resulted in additional challenges to the TAC setting for skates and rays. Discussions between the Parties are ongoing regarding a joint way forward to improve stock management.

The ACs actively contributed to the setting up of the STECF Expert Working Group 22-08 Skates & Rays Management ([link](#)) and organised a stakeholder led workshop in February 2023 bringing together from the European Commission, the UK administration, the Advisory Councils, and the scientific community to address the harmonisation of TAC setting approach between the EU and the UK, sub-TACs for specific species, prioritisation of specific species for survivability research and best practices among other. Details of the proceedings of this workshop including presentations and a full report can be found [here](#). Following submission of joint advice in May 2023⁴, members of the joint Focus Group focused their attention on the difficulties related to the group TAC setting approach covering multiple commercially important species in the North

² https://www.nsrac.org/latest-advice/?advice_search=prohibited&date=

³ For example INTERREG SUMARIS project ([link](#)), Bord Iascaigh Mhara ([link](#)), Harokit ([link](#)), INNORAYS ([link](#)), Raywatch ([link](#)), Bridging Knowledge Gaps for sharks and rays in the North Sea ([link](#)).

⁴ NWWAC/NSAC advice on skates & rays management ([link](#))

Western Waters and the North Sea. On foot of this advice, the Advisory Councils were pleased to note the harmonisation of TAC setting between the EU and the UK with the method developed by the UK now jointly being applied. However, members expressed their concern about the application of the same rule to arrive at management for various stocks as life histories between elasmobranch species can differ greatly making a one-size-fits-all approach unsuitable. Additionally, the mixture of management units and biological stock units has been described as a significant barrier to progress.

To reflect on EU and UK approaches to management and further investigate best practice and management options also with the involvement of the Member States, the ACs organised a second stakeholder led workshop on skates and rays management in September 2025 ([link](#)). Participants from both Advisory Councils as well as MS representatives from Belgium, Denmark, Ireland, France, Spain, and The Netherlands explored alternative approaches to the generic group TAC taking into account the potential socio-economic impacts. They considered potential management plans as well as the inclusion of skates and rays species into the EU multiannual plans and explored image recognition, automatic catch recording and AI in bid to contribute to data collection for data-limited stocks and to proper identification of species. The following recommendations are based on the discussions of this workshop.

Recommendations

1. When considering the removal of or setting a catch limit for species from the group TAC, it is vital that a solid scientific basis is available to justify removal, i.e. is the stock over-exploited, unsustainably harvested, or threatened. Attention should be given to stocks for which MSY is available as well as vulnerable species and those with low advice. Potential candidate species which could be investigated further include:
 - cuckoo ray in areas 6, 7, and 8 due to its category 2 status and large advice;
 - thornback ray in 4 and 3a for its high TAC;
 - spotted ray in 4 and 3a because its status is known and identification is relatively straightforward;
 - sandy ray and shagreen ray in areas 6 and 7 due to low quotas and potential for choke species, though removal or catch limit was conditional on cuckoo ray being included in removal or catch limit;
 - and small-eyed ray in 7 e-f, and g as a category 1 stock, which already benefits from an “of which” clause.
2. When considering stocks for removal or setting a catch limit for from the group TAC, a thorough analysis of potential choke issues, socio-economic impacts, and effects on other fisheries must be carried out in order to avoid unnecessarily restrictive measures.

3. Careful, gradual management adjustments are needed rather than abrupt changes. A phased approach focussing first on a small number of stocks is preferable to avoid potentially restrictive impacts.
4. Research should be carried out regarding the mismatch between stock assessments and management areas as well as identifying actual management blockages without unnecessarily limiting fishing activity. Consideration should also be given to an alternative reference period for allocating percentages between management areas, since reliance on historical landings has resulted in settled percentages that no longer accurately reflect current stock distributions and behaviours. Unless this reference period is reviewed and updated based on recent landings and stock distribution, the gap between the realities at sea and potential species-specific catch limits will widen. This situation could significantly reduce fishing opportunities for certain Member States.
5. ICES WGEF should review available data regarding thornback ray in the Skagerrak and advise the Commission regarding the potential removal of this species from the prohibited species list.
6. ICES should urgently review the data limitations, categorisation and advice issued for blonde ray, a high value species. Limited data availability means that advice has traditionally been based on average landings with precautionary reductions having been applied over the past years. This means that the current advice is only 20% compared to the original level possibly without any actual changes in the fishery. AC members believe that improvements in the assessment for blonde ray are a key priority.
7. ICES WGEF should review the minimum conservation reference sizes (MCRS) in order to establish if different sizes may be required for different species. Should new MCRS be introduced, effects must be monitored closely, specifically to ensure that this measure remains simple and applicable by fishermen.
8. The tracking of year classes should be improved to provide a clearer picture of populations changes with the aim of incorporating this information into ICES stock assessments.
9. In addition to existing proposals for changes to the management of skates and rays, an analysis and evaluation should be carried out regarding the potential effectiveness of a system in which a combined TAC could include a species-specific limit, requiring that individuals of that species be released after capture rather than halting the entire fishery.
10. Active involvement of fishers in data collection is vital in order for obtaining accurate observations at sea in a timely manner. This will also ensure buy-in as fishers are responsible for implementing measures as well as positively influence not only direct management but broader policy and management measures by displaying equality and collaboration between scientists and fishers. Ideally, any new management measures are introduced via co-creation also with the involvement of the Advisory Councils.

11. Any introduction of AI tools and cameras on board of vessels for data collection purposes should be carried out in close collaboration with fishers to ensure trust and buy-in. This could align both regulatory requirements as well as scientific needs.
12. Any management measures must be flexible enough to respond quickly once new data becomes available.
13. All measures, including for example MCRS, change in management units or seasonal closures, must be harmonised with the UK.

The ACs caution against a rushed approach to the implementation of any changes regarding the management of skates and rays and emphasise the importance of stakeholder involvement at all levels of discussion regarding potential changes. Members stand ready to continue their involvement with and contribution to the work of the European Commission and thank DG MARE for their continued efforts regarding the management of these species.

Thank you for your attention on this matter, we look forward to your feedback.

Yours sincerely,



Alexandra Philippe
NWWAC Chair



Kenn Skau Fischer
NSAC Chair