

Ms Charlina Vitcheva  
Director-General  
Directorate-General for Maritime Affairs and Fisheries  
European Commission  
1049 Brussel  
Belgium

8 November 2021

**Subject: Joint NWWAC/NSAC advice on management measures for seabass in 2022**

Dear Ms Vitcheva,

The North Western Waters Advisory Council (NWWAC) and the North Sea Advisory Council (NSAC) established their Joint Focus Group on Seabass to prepare an advice to the European Commission on the measures to take in 2022 in both commercial and recreational fisheries to aid the recovery of seabass stocks in the North Western Waters and in the North Sea.

Unfortunately, it was not possible to reach full consensus in the preparation of this advice, which includes a minority position expressing the dissenting opinion of the European Anglers Alliance (EAA) and the International Forum for Sustainable Underwater Activities (IFSUA). Moreover, NSAC OIGs cannot fully support this paper.

The text below provides a summary of the main points developed in the full advice document, approved by the NWWAC Executive Committee on 2 November 2021 and by the NSAC Executive Committee on 5 November 2021 attached to this letter:

- **Consensus was reached on the recommendations to the Catches Allocation Tool.** As explained in the advice, NWWAC and NSAC are concerned about the points of weakness identified in the current version of the tool. They agree that a revision and a substantial improvement of the tool are necessary before it can be put to good use for the exercise of discussing seabass management measures for commercial fisheries. However, the ACs would support the use of the current version of the tool for discussing management measures for recreational fisheries.
- The following table presents the **majority proposal** for commercial and recreational seabass fisheries for 2021. For trawls and seines, members propose to lift the ban on catches in February and March to reduce discards. Moreover, it is proposed that an annual individual vessel landing limit (by weight) is set to further increasing flexibility. The majority of ACs members considers that no additional relaxation should be considered in the measures concerning recreational fishing and recommends that the 2021 measures be renewed identically for 2022.

Metiers	2021 Majority Proposal
Hook and line	February-March ban 5,7 tonnes per vessel per year Capacity ceiling (number of vessels)



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North Sea Advisory Council

<b>Set net</b>	February-March ban 1,4 tonnes per vessel per year Capacity ceiling (number of vessels)
<b>Demersal trawls and seines</b>	4.5 t per vessel per year (i.e. 0.38 x 12) 5% weight total catches per fishing trip
<b>MRF / Recreational</b>	Retention ban in January, February and December. 2 fish/day: March – November Net fishing ban

- The **minority position** recommends no relaxation of commercial fishing measures for 2022. Especially for demersal trawlers and seiners, measures relaxation at this time would be inconsistent with the precautionary principle, since they could easily lead to an increase in mortality. Looking at the ICES advice for 2022 and at the increase available compared to last year of 179 tonnes, the minority group recommends increasing the bag limit for recreational fisheries from 2 to 3 fish and the open period from 9 to 10 months (1 March to 31 December).
- NWWAC and NSAC agreed that the proposed management measures should be accompanied with additional measures that aim to **enhance monitoring and data collection**. The poor quality of data on removals from recreational fishing and discards from commercial fishing represents a significant problem that needs to be addressed urgently. Indications from ICES regarding the characteristics of the sampling programme needed for establishing reliable discards data would be very useful.
- A complete system for reporting, collecting and monitoring recreational catches must be defined and implemented as quickly as possible. In particular, the ACs wish to put forward the following recommendation to the proposal for a revised Control Regulation: the introduction of a **compulsory registration or licensing system and of a catch reporting scheme for recreational fisheries**, mandatory for stocks subject to Union conservation measures like seabass.
- The ACs highlight that efforts to reduce the bycatch of seabass are undermined if there is insufficient control of the correct application of the measures. It is necessary that Member States **continue and strengthen the effort to monitor fishing activities and control compliance with management measures**, both for commercial fishing and for recreational activities.

We hope that the recommendations made by the NWW and NS Advisory Councils will provide a helpful contribution in the management of this important resource and look forward to receiving your reply.

Yours sincerely,

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Chair of the NWWAC

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Chair of the NSAC Executive Committee

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