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Date: 9 October 2017
Our reference: 1718/PAC 02
Subject: Consultation on fishing opportunities and TACs 2018

Dear Mr Aguiar Machado,

The Pelagic Advisory Council (PELAC) appreciates the opportunity to comment on the *“Communication from the Commission on the State of Play of the Common Fisheries Policy and Consultation on the Fishing Opportunities for 2018”* and to provide recommendations on Total Allowable Catches (TACs) in 2018 for stocks under its remit.

Regionalization

The PELAC has noticed with satisfaction that the Advisory Councils are being mentioned in regards to the crucial role they play in the regionalization process. Nevertheless, the PELAC seeks further support from the Commission regarding the consultation process with the regional groups. Despite Member States being obliged to consult Advisory Councils on joint recommendations, the consultation process with the PELAC is unsatisfactory. The timeframe for commenting on joint recommendations is often set to a few days only. Furthermore, Member States generally do not respond to advice received by the PELAC.

Therefore, the PELAC has proposed an annual meeting during which the chairs of the regional groups and representatives of the PELAC present the respective organizations’ work programmes to align agendas and expectations. The PELAC hopes for the strong support of the Commission regarding this initiative.



Economic performance of the EU fleet

The information on economic performance is of little use other than that it shows an overall positive trend. The data provided are too old and not broken down by fleet segment. In order to derive meaningful conclusions, however, the performance by different fleets is a key element.

Management strategies

One of the key objectives of the PELAC is to develop management strategies for all the stocks under its remit and to follow these strategies subject to a positive evaluation by ICES. The 2018 TAC advice by the PELAC (see below) reflects this objective.

TAC proposals for 2018

This section provides a detailed overview of TAC proposals for all stocks under the remit of the PELAC and has been unanimously endorsed by the Executive Committee.

Blue whiting

The PELAC recommends following the ICES MSY advice and setting the TAC at 1 387 872 tons in 2018. The PELAC further encourages Coastal States to explore the two-tier approach to fishing mortality as originally suggested in the multiannual management strategy developed by the PELAC in 2012. The PELAC believes that working with different fishing mortality values at different SSB levels could be a key tool in securing long-term stability without sacrificing yield. Furthermore, the PELAC has established a focus group working on developing methods to manage the stock in a dynamic and sustainable manner. The PELAC encourages the EU Commission and Member States to contribute to the work of this focus group, whose key aspect is to identify methods to improve data and knowledge on stock recruitment – one of the key elements in the ICES stock advice.

Atlanto-Scandian herring

The PELAC recommends following the existing long-term management plan and to set the TAC at 546 472 tons accordingly in 2018. In addition, the PELAC will await the re-evaluation of reference points scheduled to take place in early 2018 after which further recommendations might be submitted.

North Sea autumn spawning herring

The PELAC notes that ICES has revised the F_{msy} reference point for North Sea autumn spawning herring in 2016. Despite the PELAC's recommendation to adjust the EU-Norway management strategy accordingly, the new F_{msy} reference point has not been incorporated into the management strategy. The PELAC again recommends that the management strategy will be revised to include the correct F_{msy} reference point. This must be done as quickly as possible and before the December Council meeting so that the TAC for 2018 can be set based on a management strategy that is in accordance with the CFP and the latest scientific advice.

Western Baltic spring spawning herring

The PELAC recommends following the management strategy agreed by the EU and Norway, but to revise the TAC setting mechanism taking into account the revision of the EU-Norway management strategy for North Sea autumn spawning herring as recommended by the PELAC.

North Sea horse mackerel

The PELAC recommends that the TAC is set at 15 179 tons in 2018 in line with the ICES “catch advice”. This figure excludes 2 338 tons based on discard estimates from the demersal sector which has not yet come under the landing obligation. The PELAC recommends that Member States and the Commission develop solutions on how to eliminate discards of pelagic species in demersal fisheries. The landing obligation will be fully implemented by January 2019 and sustainable solutions to minimize bycatches of pelagic species in the demersal sector must be developed and implemented. The PELAC notes that the EU approach to ICES catch advice may result in an increased fishing mortality in the directed fishery which under sustainability considerations must be avoided. The unexpected high discard rate of 13.35% estimated by ICES causes concern amongst members of the PELAC. Furthermore there is significant discrepancy between discard data used by ICES and data used by STECF. The PELAC therefore further recommends that the discard data from the demersal fishery will be thoroughly analyzed.

Northeast Atlantic mackerel

The PELAC recommends that the long-term management strategy developed by the EU, Norway and the Faroe Islands, to be revised on 10-12 October 2017, will be followed, if it meets the criteria of the precautionary approach and article 2.2 of the CFP. If this is not the case, the PELAC recommends that the ICES MSY approach will be followed and that the TAC will be set at 550 948 tons in 2018.

Furthermore, the PELAC strongly recommends that technical issues impacting the stock assessment will be resolved as soon as possible. This includes the differences observed in the egg survey compared to the IESSNS survey, as well as problems with the RFI tagging program.

Western horse mackerel

The PELAC recommends following the ICES MSY advice and to set the TAC in 2018 at 117 070 tons.

In addition, the development of a new long-term management strategy, aided by genetic stock identification work, must be continued.

Southern horse mackerel

The PELAC recommends following the ICES MSY advice and to set the TAC in 2018 at 55 555 tons.

Furthermore, the PELAC has developed a long-term management strategy and kindly asks the Commission to submit this strategy to ICES for evaluation.

Boarfish

The PELAC recommends following the ICES advice based on the precautionary approach and to set the TAC in 2018 at 21 830 tons. Furthermore, the PELAC seeks clarification from ICES or STECF in relation to the wanted catch advice and why that has not been included in the ICES advice, as it has been for North Sea horse mackerel.

The work on developing an analytical assessment has to be continued as well.

Herring in ICES area 6a and 7b,c

The PELAC recommends that a monitoring TAC should be implemented, subject to the evaluation of the rebuilding plan developed by the PELAC. Having a monitoring TAC in 2018 is essential to continue the industry surveys as well as the genetic stock identification study. Once additional scientific information is available a benchmark must be carried out aiming at having separate stock assessments again.

Celtic Sea herring

The PELAC recommends following the management strategy and to set the TAC in 2018 at 10 127 tons, provided that STECF evaluates it to meet article 2.2 of the CFP before the December 2017 Council meeting. Otherwise, the ICES advice should be followed.

Furthermore, the mixing issue with Irish Sea herring must be addressed and the difficulties with the acoustic survey must be resolved.

Irish Sea herring

The PELAC recommends following the ICES MSY advice and to set the TAC in 2018 at 7 016 tons.

In addition, the mixing issue with Celtic Sea herring should be followed-up on and a management strategy for this stock should be developed as soon as possible.

In case you have any questions, please do not hesitate to contact the Secretariat.

Kind regards,

A handwritten signature in blue ink that reads 'Jesper Raakjær'.

Jesper Raakjær
Chairman Pelagic AC