



Mr Bernhard Friess
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Date: 23 March 2020
Our reference: 1920/PAC30
Subject: Deductions in NS and Western horse mackerel 2020 TACs

Dear Mr. Bernhard Friess,

Like every year, the Pelagic AC looked back at the effectiveness of its annual TAC advice based on the final TAC setting at December Council, during its March 2020 meeting. During the meeting the Pelagic AC became aware that once again, deductions had been applied on the final 2020 TACs for North Sea and Western horse mackerel.

Similar deductions have been applied to these same stocks the year before. At the time, the basis of the calculations to arrive at the deductions in TAC were unclear to the members of the Pelagic AC. We were therefore very grateful that the Commission facilitated this discussion by having a representative involved in these calculations attend our July 2019 meeting and provide additional explanations during a subsequent WebEx meeting on 23 July 2019.

Based on these discussions, the Pelagic AC came to a better understanding of the origin of the figures used by the Commission and the methodology applied to arrive at the deductions in TAC for the stocks, even though the Pelagic AC didn't always agree with some of the underlying assumptions in the approach. In Annex I you will find a summary report which the secretariat produced as a result of this interaction.

When it comes to the current year (2020), the Pelagic AC is once again surprised and confused about the deductions in TAC applied to both stocks. This is particularly so as the landing obligation became effective from the 1st January 2019 for all TACs and quotas species, and demersal discards plans for the North Sea, North Western Waters and South Western Waters contain small quantities of horse mackerel that could be discarded under the de-minimis exemptions:

Article 9 (m) of demersal discard plan for the North Sea (2018/2035):



“In the demersal mixed fishery with bottom trawls (OTB, OTT, PTB, TBB) with a mesh size between 80 and 99 mm in ICES subarea 4:

*a quantity of **horse mackerel**, which shall not exceed **7 %** in 2019 of the total annual catches in that fishery of horse mackerel; the de minimis exemption set out in this point (m) shall be provisionally applicable until 31 December 2019.*

Member States having a direct management interest shall submit as soon as possible before 31 May 2019, additional scientific information supporting the exemption. The Scientific, Technical and Economic Committee for Fisheries (STECF) shall assess the provided scientific information before 1 August 2019; ”

It seems to the Pelagic AC that the 2018 discards figure may have been used which, if this is the case, are not appropriate as demersal discards plans were effective from the 1st January 2019. The Pelagic AC would therefore appreciate further clarification from the Commission on the methodology that was applied for the deductions in the 2020 TACs for North Sea and Western horse mackerel and on the methodology that will continue to be applied in the future.

We wish to point out that the current de minimis exemptions effective in the different pelagic discard plans only apply to vessels **below** 25 meters (which for the most part are polyvalent vessels that fish both demersal and pelagic species), while the deductions apply to the entire stock regardless of the fleet segment that targets the species. These vessels below 25 meters were included in the scope of the demersal discards plans from the 1st January 2019.

Thanking you for your consideration of the above, and looking forward to your response,

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jesper Raakjær'.

Jesper Raakjær
Chairman Pelagic AC