



MINISTRY OF
AGRICULTURE, FISHERIES
AND FOOD

FISHERIES GENERAL SECRETARIAT

Alicia Villauriz Iglesias

Jesper Raakjaer
Pelagic AC
Louis Braillelaan 80
2719 EK Zoetermeer

30th October 2019

Dear Sir,

Firstly, I would like to thank you for your letter of 22nd October concerning the approach on fisheries management in your remit and where you request our support in establishing the TAC for the Southern horse mackerel based on the exploitation rule approved by PELAC along with the SWWAC.

In this regard, we believe a long-term approach based on a scientifically-validated exploitation rule is the most appropriate one. Furthermore, it is particularly relevant, in this case, that it was the result of a joint effort between the two Advisory Councils with an interest in fisheries and by scientists specialised in this domain.

However, we are quite surprised by PELAC's request forwarded to the European Commission on 7th October and which you now mention. In such a way, the 46,659 t proposed by the PELAC for the Southern horse mackerel stock is theoretically based, as illustrated by the ICES advice framework, on the plan you forwarded to the European Commission in 2017.

Conversely, the reality is that the plan proposes to achieve Fmsy in stages in order to reach the goal in 2025, which means that simultaneously as Btrigger is exceeded, the mortality should be Fmsy.

As you well know, since 2017, the stock is already being exploited at the Fmsy level ($F=0.11$), an objective set out by the Common Fisheries Policy for next year in 2020. Moreover, its Biomass at record high levels, stands over one million tons, which is found to be far beyond Btrigger (181,000 t).

Therefore, we request your clarification on the proposed TAC of 46,659 t which entails a decrease in existing possibilities by 55% compared to the current situation, instead of the suggested TAC by the ICES, under Fmsy, 116,879 t, which would lead to a 24% increase compared to that established for this year.



MINISTRY OF
AGRICULTURE, FISHERIES
AND FOOD

FISHERIES GENERAL SECRETARIAT

Alicia Villauriz Iglesias

In this regard, we would rather see the PELAC propose to apply point 4 of article 5 of the exploitation rule, which indicates that the TAC should not have a variation over 15% for each annual period, setting a TAC of 108,119 t.

Finally, I wish to inform about the importance of this stock for the Spanish fishing industry, and to reiterate how significant it was that the aforementioned management strategy was planned in consensus with the SWWAC, where the vast majority of fishermen exploiting this stock is represented. Thus, we see it as positive that in the future, TAC proposals can also be part of the consensus between the two Advisory Councils.

Alicia Villauriz