



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE/C1-D3/CB-PCO/ARES(2020)

Mr. Jesper Raakjær  
Pelagic Advisory Council  
Louis Braillelaan 80 2719 EK  
Zoetermeer  
The Netherlands

**Subject: Deductions in North Sea and Western horse mackerel TACs**  
**Your reference: 1920/PAC30**

Dear Mr Raakjær,

Thank you for your letter of 23 March 2020 enquiring about the deductions applied to the North Sea and Western horse mackerel TACs for 2020.

In your letter, you ask the Commission for clarifications on the methodology used for the horse mackerel *de minimis* deductions. As you know, the Commission bases its calculations for these deductions on the best available scientific advice. In this sense, we applied the same methodology as last year by using the preceding year's discard figures as reported in the latest ICES advice. The ICES advice for 2020, published in 2019 indeed used 2018 discard data. This resulted in a *de minimis* deduction of 1.79% and 2.57% respectively for North Sea and Western horse mackerel.

You consider that using the 2018 discard figures was not appropriate because demersal discards plans entered into force on 1 January 2019. I understand your concern that this does not take into account the demersal discarding patterns from 2019, and that consequently, it does not provide the full and accurate picture of discards at the specific levels of demersal and pelagic vessels. Nevertheless, at the time of the adoption of the TAC, we did not have a more specific breakdown of data for both demersal and pelagic discards from STECF or ICES. Therefore, we had to use ICES' information to forecast discard rates in 2020 based on ICES 2018 discard data. As the advice is produced in 2019, scientists do not have a full year of 2019 catch, landing and discard data at the time of publication in 2019. We will therefore only have a full year of 2019 discard records in the upcoming advice for 2021, to be published later this year.

An alternative approach could be to use a five-year average, which could result in a larger *de minimis* deduction, but would not necessarily reflect the year-to-year changes in fishing behaviour and associated discards.

I hope this clarifies your doubts, and I wish you a healthy and safe rest of the year. Should you have more questions regarding this letter, please contact Ms Pascale Colson, coordinator of the ACs ([pascale.colson@ec.europa.eu](mailto:pascale.colson@ec.europa.eu)).

Yours sincerely,

Bernhard FRIESS  
Acting Director-General