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Date: 14 October 2020
Our reference: 2021PAC05
Subject: Consultation on TACs 2021

Dear Ms. Charlina Vitcheva,

The Pelagic Advisory Council (PELAC) appreciates the opportunity to comment on the “Communication from the Commission Towards more sustainable fishing in the EU: state of play and orientations for 2021” and to provide recommendations on Total Allowable Catches (TACs) in 2021 for stocks under its remit. The PELAC makes recommendations on the scientific advice for stocks in its remit when they become available. It has consistently done so since its inception.

Progress towards Fmsy

In its policy statement the Commission indicates that the Council set 62 out of 78 TACs in line with Fmsy last year. The Pelagic AC recommends presenting statements less generically and would welcome specific information and figures on stocks within the remit of the PELAC, namely MSY assessed stocks fished at MSY.

Landing Obligation

The Pelagic AC wants to highlight the issue of the publication of the executive summary of the evaluation report of the mackerel fishery on the EFCA website without the release of the full report on the topic. For the PELAC, this is a breach of transparency and does not allow for any answer to the allegations made in the summary nor gives any explanation on the methodology used. The PELAC has taken action to call for the release of the full report and will continue to do so. It shall also engage in discussion with EFCA on the topic.

Brexit

The Pelagic AC is concerned about the functioning of the AC after January 1st 2021. A focus group has been set up to look at these issues and the support of the Commission will be key on this.



COVID-19

This year is unlike any other and the fishing industry has been heavily impacted by the COVID-19 crisis. The PELAC wants to highlight the hardship many have faced and are still facing in the pelagic sector.

Role of science

The Pelagic AC notes that the policy statement does not reflect on the role of the scientific community, the quality of the scientific work and the Commission's priorities as an ICES client. Furthermore, the statement doesn't reflect the fact that for some stocks the quality of the science is not as reliable as is desirable, subject to year-to-year changes in some instances, and also in terms of Fmsy values.

As a general principle, the Pelagic AC believes the CFP - being science based - should ensure the quality of the science that underpins scientific advice.

Economic performance of the EU fleet

The Pelagic AC welcomes the progress on the fleet economics overview relative to previous years, to now include projections for future years. The Pelagic AC also appreciates the Commission's support in requesting that STECF include a pelagic chapter in the STECF Annual Economic Report, which will give a more accurate overview of the performance of the different fleet segments.

However, the Pelagic AC recalls its position in relation to the new control regulation proposal regarding fleet capacity. In the context of pelagic fisheries, it is not meaningful to quantify capacity solely in kW and GT nor is capacity expressed in kW and GT the best indication of (pelagic) fishing effort. The Pelagic AC recommends that this be rectified in future proposals and suggests following article 22 of the CFP as the way forward.

The Pelagic AC wants to draw attention in this context to the problem of improving safety and labor conditions on board being made impossible by capacity limits.

Management strategies

One of the key objectives of the Pelagic AC is to develop management strategies that are in line with objective 2.2 of the CFP for all the stocks under its remit and to follow these strategies subject to a positive evaluation by ICES. The 2021 TAC advice by the PELAC (see below) reflects this objective.

TAC proposals for 2021

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.

General Comments:

First, in 2020, the *information from stakeholders* part of the ICES advice has been taken out of the truncated advices. This exceptional change occurred because of the COVID-19 situation that did not allow for ICES to fully carry out its usual procedure. In 2021, the PELAC would like to make sure that this section of the advice is reinstated for all stocks. ICES is working on improving the *information from stakeholder* section and PELAC commends it for that. It is also an item on the PELAC agenda.

Second, the PELAC, and its industry stakeholders in particular, has been working actively on large-scale genetics projects on stock identification. The collection and analysis of genetic data need to be

included in the scope of data collection framework (DCF). Moreover, research financing from different sources should be made available to support this type of research that - until now - has been funded by the industry.

Third, in 2019 the Pelagic AC commissioned work from an external consultant to evaluate PELAC's two-tier management plan proposal for Blue Whiting by way of a hindcasting exercise. This hindcasting exercise found that the current implementation of the -20%/+25% TAC stabilizing bounds could be problematic in terms of securing sustainable management of the stock in the long term.

The result from the work done on Blue Whiting raises issues in relation to the use of TAC stabilizing bounds in general. The Pelagic AC recommends that the Commission raises this issue and the use of other stabilizing mechanisms in general with ICES for further evaluation.

Blue whiting

The PELAC recommends managing the Blue Whiting stock on the basis of a Long-Term Management Plan. However, PELAC recognizes that the current situation with no sustainable long-term Coastal States sharing arrangement in place for Blue Whiting is not sustainable in the long term and questions the performance of the agreed management plan currently forming the basis for the management of Blue Whiting.

The PELAC encourages the EU-Commission and Member States to resolve the long going dispute over the sharing of the stock among Coastal States.

The PELAC is concerned with the issues raised by ICES in the advice for 2021 regarding the effects of unilateral quotas, and the risk that the implementation of the current Long Term Management Plan agreed by Coastal States may no longer be precautionary. The PELAC recommends the EU-Commission to request ICES to perform a Management Strategy Evaluation of the current Long-Term Management Plan as soon as possible.

Atlanto-Scandian herring

The PELAC recommends following the ICES advice based on an agreed Long-Term Management Plan and setting the TAC at 651 033 tons in 2021.

The PELAC again encourages the EU Commission and Member States to seek rapid agreement with all Coastal States on a sustainable long-term sharing arrangement for the stock. The current situation with no agreed sharing principles is not sustainable in the long-term.

North Sea horse mackerel

The PELAC recommends following the ICES advice and that the TAC is set at 14.014 t in 2021 in line with the Precautionary Approach.

The PELAC recommends that bycatches and possible discards of North Sea Horse Mackerel in non-targeted fisheries are monitored closely and recorded, and that systems to validate these data are put in place as part of the implementation and evaluation of discard plans and the de minimis provisions covered by those plans.

North Sea autumn spawning herring/3A

North Sea autumn spawning herring is a key stock in EU fisheries and secures fishing opportunities for four different fisheries in the North Sea and in 3A. The Pelagic AC recommends that the EU and Norway finish work on developing a Long-Term Management Plan that is in accordance with the CFP, the latest scientific advice and that can form the basis for future scientific advice.

For the 2021 the Pelagic AC recommends following the ICES advice based on the MSY-approach, setting a TAC at 359.367 t for the A-fleet. For 3A the PELAC recommends following the agreed EU and Norway TAC principles when setting the TAC and taking into account the above recommendations for the North Sea autumn spawning herring component.

The PELAC is concerned with the critical situation for the Western Baltic Spring Spawning Herring stock (WBSS) of which a substantial part is by-caught in fisheries under the remit of the PELAC. The PELAC recommends the EU-Commission and Member States to explore possible options, as suggested by ICES, for area and/or time restrictions in the directed herring fisheries in the North Sea and 3A and related fisheries with unavoidable by-catches of WBSS herring, in order to reduce critical pressure on the stock. These measures should be explored in dialogue with the PELAC and on the basis of scientific advice, taking into account the dynamics of both the WBSS and the North Sea Autumn Spawning herring.

Western Baltic spring spawning herring

No recommendation on Baltic Stocks in accordance with CFP annex III. See recommendations for North Sea herring / 3A.

Northeast Atlantic mackerel

The PELAC recommends following the ICES MSY advice and setting the TAC in 2021 at 852.284 tons.

The PELAC requests that the European Commission asks ICES to examine the differences between the results given by the IENSSN survey and the egg survey.

The PELAC recommends that the agreed Three Parties Management Strategy be revised in accordance with the revised Management Strategy Evaluation limit reference points.

The PELAC reinforces the need for the European Commission and the Coastal States to adopt a Long Term Management Strategy that is considered precautionary by ICES, and in line with the internationally agreed objectives of fishing below levels that can produce MSY by 2015. It is important to remember that the scientific advice for the stock has been exceeded in recent years. If this practice continues, sustainable management of the stock will be jeopardised.

The PELAC requests a review of the stock components and of the protection measures in place.

Western horse mackerel

The PELAC recommends following the ICES MSY advice and setting the TAC in 2021 at 81 376 tons.

The PELAC recommends that the evaluation by ICES of the rebuilding plan for this stock be expedited.

Southern horse mackerel

The PELAC reaffirms its intention to continue pursuing the development of a management strategy for Southern horse mackerel.

The PELAC requests the Commission to ask ICES to establish the reason for the differences between the MSY advice and the Management Plan advice and to propose solutions to address differences. In particular to provide catch options for various target dates (2021, 2022, 2023, 2024) for fishing at F_{MSY} (article 5.1 of the Management Plan).

The PELAC requests the Commission to ask ICES to expedite the evaluation of the different catch options. Upon reception of this evaluation, PELAC will convene a Working Group II meeting to discuss its advice.

Boarfish

The PELAC recommends following the ICES advice based on the precautionary approach and to set the TAC in 2021 at 19 152 tons.

The PELAC recommends that a benchmark is carried out in 2021.

Herring in ICES area 6a and 7b,c

The PELAC recommends following the ICES advice and setting the TAC in 2021 at 0 tons.

The PELAC requests that the Commission asks ICES for an urgent review of the EASME Genetic Project outcome.

The PELAC requests that a benchmark is carried out in 2021.

The PELAC recommends continuing the scientific sampling programme in both 6a North and 6a South, 7bc in accordance with ICES catch scenarios to provide minimum level of catches needed to provide sufficient data for ICES.

The genetics projects should be continued, as should the industry acoustic survey. The morphometric work should be discontinued.

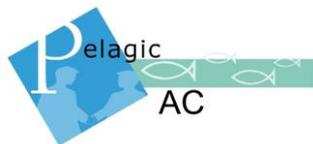
The PELAC recommends that solutions are sought to be able to utilise the historical data series for splitting these data into two stock components.

Celtic Sea herring

The PELAC recommends following the ICES advice and setting the TAC in 2021 at 0 tons.

Additionally, the PELAC recommends continuing the scientific sampling programme, at the appropriate times, in accordance with the ICES recommendation for a minimum amount of catch that will ensure the continued scientific monitoring of the stock - 869 tonnes.

Furthermore, the mixing issue with Irish Sea herring needs to be addressed.



Irish Sea herring

The PELAC recommends following the ICES MSY advice and setting the TAC in 2021 at 7.341 tons.

The PELAC requests that WKIRISH ecosystem approach is incorporated into future assessment of this stock.

Furthermore, the mixing issue with Celtic Sea herring needs to be addressed.

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

