

Dña. Alicia Villauriz Iglesias
Secretaria General de PescaC/ Velázquez, 144
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Per email to: sgpesca@mapama.es

Pelagic AC
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Date: October 22nd 2019
Our reference: 1920/PAC09
Subject: Support for the management plan for Southern horse mackerel
Enclosure: Consultation on fishing opportunities 2020

Dear Ms. Alicia Villauriz Iglesias¹,

On behalf of the Pelagic Advisory Council for Fisheries (Pelagic AC) I am writing to you regarding a special request from our organisation.

As you may be aware, it is the objective of any Advisory Council to support processes leading to stocks being managed under long term management strategies. The Pelagic AC has a long history of successfully developing long term management strategies for the stocks in its remit which has undoubtedly contributed substantially to the sustainable exploitation of those fish stocks. Significant time and effort have been spent to develop, among others, a management strategy for Southern horse mackerel, which has been evaluated and deemed precautionary by ICES.

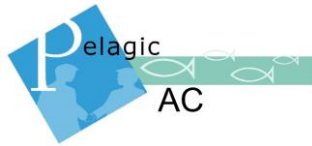
With this letter we would kindly like to ask you, as one of the Member States concerned by this stock, to support the application of the management strategy for the stock of Southern horse mackerel during the upcoming discussions of the December Council. This recommendation was also made to the European Commission in our annual *Consultation on fishing opportunities 2020* advice attached to this letter (Annex I).

We are looking forward to your support on this matter and in case you have any questions please do not hesitate to contact the secretariat.

Thanking you for your kind consideration.

¹ This letter has also been sent to the national government of Portugal





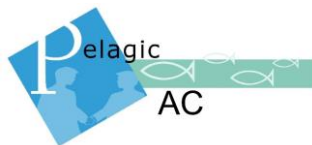
Yours sincerely,

A handwritten signature in blue ink that reads "Jesper Raakjaer".

Jesper Raakjaer
Pelagic AC Chairman

Copies: Pascale COLSON (EC)





Annex I

Letter to the European Commission on Consultation on Fishing Opportunities 2020 (07/10/2019)

Mr Joao AGUIAR MACHADO

Director General
Directorate General Maritime Affairs
and Fisheries
Rue de la Loi 200
1049 Brussels
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Date: 07 October 2019
Our reference: 1920PAC05
Subject: Consultation on TACs 2020

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 2020' and to provide recommendations on Total Allowable Catches (TACs) in 2020 for stocks under its remit.

Progress towards Fmsy

In its policy statement the Commission indicates that 78% of TACs of MSY-assessed stocks are now set in line with Fmsy. The Pelagic AC recommends including the latest outcomes of the revised mackerel TAC advice to this figure, to fully reflect the current status.

In one of the concluding points, the Commission states that many EU stocks remain overfished or are outside safe biological limits. This assertion is in direct contradiction to what is stated at the start of the Commission's Fishing opportunities 2020 document in relation to the Northeast Atlantic, where according to the Commission's document, 78% of the MSY-assessed stocks are fished at MSY. The Pelagic AC therefore recommends presenting such statements less generically and to make a distinction by geographical area when communicating this figure.



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 for all the stocks under its remit and to follow these strategies subject to a positive evaluation by ICES. The 2020 TAC advice by the PELAC (see below) reflects this objective.

TAC proposals for 2020

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 Comment: TAC Stabilizing Bounds

In 2019 the Pelagic AC commissioned work from an external consultant to evaluate a two-tier management approach for blue whiting using a hindcasting exercise. The study found that the current implementation of the -20%/+25% TAC stabilizing bounds could be problematic in terms of securing sustainable management of the blue whiting 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 European Commission raises this issue and the use of other stabilizing mechanisms in general with ICES for further evaluation.

Blue whiting

The PELAC recommends following the ICES advice based on an agreed Long-Term Management Strategy and setting the TAC in 2020 at 1 161 615 tons.

Furthermore, the Pelagic AC would like to reinforce that the work commissioned by the PELAC from an external consultant to evaluate a two-tier management approach using a hindcasting exercise found that the current implementation of the -20%/+25% stabilizing bounds could be problematic for the blue whiting stock in the long term. These results from the PELAC hindcast analysis highlight an issue identified by ICES, but not concluded on, in its 2016 advice on the long-term evaluation of the Coastal States blue whiting management strategy. In light of these findings, the Pelagic AC asks that the European Commission requests that ICES revisit the ICES advice for 2016 and further analyse the effects of TAC stabilizing bounds, and bring the results to the Coastal States once available. This is especially relevant given the fact that the scientific advice for this stock has been considerably exceeded in recent years and that currently the SSB is decreasing significantly.

The PELAC again encourages the European 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.

Atlanto-Scandian herring

The PELAC recommends following the ICES advice, based on an agreed Long-Term Management Strategy and therefore setting the TAC in 2020 at 525 594 tons.

The PELAC again encourages the European 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, in line with the Precautionary Approach, and setting the TAC for 2020 at 14 014 tons.

The PELAC, and its industry stakeholders in particular, have been working actively on a large-scale genetics project focused on stock identification. This research project on the genetic composition of horse mackerel stocks was initiated in 2015 with University College Dublin. Genetic samples have been taken over the whole distribution area of horse mackerel during the years 2015, 2016, and 2017, with a specific focus on the separation between horse mackerel in western waters and horse mackerel in the North Sea. A full genome sequencing exercise has been initiated to allow for future mixed-sample analyses. This project must be continued.

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 ICES provide scientific advice on the basis of a Long-Term Management Strategy (LTMS) that is in accordance with the CFP and the latest scientific advice. Ongoing work on developing a sustainable LTMS should be finalized as soon as possible.

For 2020 TAC-setting, the Pelagic AC recommends taking into account the latest Management Strategy Evaluation (MSE) carried out by ICES in 2019, which found that the current ICES MSY-rule, with corresponding reference points, was not precautionary in the long term under the assumptions of the simulations. In view of the MSE results, and as the ICES advice for 2020 indicates a reduction in

stock size in the coming years from 2021 onwards, the Pelagic AC recommends setting the TAC for 2020 on the basis of a F-value that is below the current ICES MSY-approach rule.

For 3A the PELAC recommends following the agreed EU and Norway TAC principles when setting the TAC. However, the level of TAC set should take into account the above recommendations for the North Sea autumn spawning herring component.

Western Baltic spring spawning herring

No recommendation on Baltic Stocks is supplied, in accordance with CFP Annex III.

Northeast Atlantic mackerel

The PELAC recommends following the ICES MSY advice and setting the TAC in 2020 at 922 064 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 ICES limit reference points.

The PELAC requests that the retrospective bias in fishing mortality (F) be resolved.

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 considerably in recent years. If this practice continues, sustainable management of the stock will not be achieved.

The PELAC requests an evaluation of the relevance of the existing minimum conservation reference size for the North Sea (30 cm) in relation to stock production and conservation. Meanwhile, the existing protecting measures for the North Sea mackerel component should remain in place for precautionary reasons.

Western horse mackerel

The PELAC recommends following the ICES MSY advice and setting the TAC in 2020 at 83 954 tons.

The PELAC recommends that the development of a rebuilding plan for this stock be expedited.

The PELAC, and its industry stakeholders in particular, have been working actively on a large-scale genetics project on stock identification. This research project on genetic composition of horse mackerel stocks was initiated in 2015 with University College Dublin. Genetic samples have been taken over the whole distribution area of horse mackerel during the years 2015, 2016, and 2017, with a specific focus on the separation between horse mackerel in the western waters and horse mackerel in the North Sea. A full genome sequencing exercise has been initiated to allow for future mixed-sample analyses. This project must be continued.

Southern horse mackerel

The PELAC recommends following the agreed and evaluated by ICES management strategy for *Trachurus trachurus* and to set the TAC in 2020 at 46 659 tons.

Taking into account the Southern Horse Mackerel ICES advice for 2020, the PELAC recommends that the European Commission takes steps to separate the management of the three species currently under the combined TAC for southern horse mackerel. This is in light of the ICES view indicating that

it prevents effective control of the single-species exploitation rates and could lead to overexploitation of any of the species.

Boarfish

The PELAC recommends following the ICES advice based on the precautionary approach and to set the TAC in 2020 at 19 152 tons.

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

A Benchmark will be requested for 2021.

The PELAC requests to include the boarfish closures as contained in the PELAC Management Strategy for this species in the NWW discards plans.

Herring in ICES area 6a and 7b,c

The PELAC recommends following the ICES advice and setting the TAC in 2020 at 0 tons.

The PELAC recommends that the European Commission tries, as a matter of urgency, to resolve with ICES the draft rebuilding plan developed by the PELAC when the advice will be provided.

The PELAC recommends continuing the scientific sampling programme in both 6a North and 6a South, 7bc at the appropriate times in 2020, covering genetics, body morphometrics and acoustics.

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

The PELAC requests the European Commission to ask for a Benchmark for this stock at the end of 2020 as the genetic project will be completed at that stage.

Celtic Sea herring

The PELAC recommends following the ICES advice and setting the TAC in 2020 at 0 tons.

Additionally, the PELAC recommends continuing the scientific sampling programme, at the appropriate times, in accordance with the ICES recommendations following a request from the European Commission.

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 2020 at 8 064 tons.

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

Kind regards,

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

Jesper Raakjær
Chairman Pelagic AC