

**Ms Charlina Vitcheva**

Director General  
Directorate General Maritime Affairs and Fisheries  
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BELGIUM

**Mr. Colm Lordan**

International Council for the Exploration of the Sea (ICES)  
H. C. Andersens Boulevard 44-46  
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**Date:** 9 July 2024

**PelAC reference:** 2324PAC69

**Subject:** Coordination and Harmonisation of Horse Mackerel Stocks Assessments

Dear Ms. Charlina Vitcheva, Dear Mr. Colm Lordan,

I am writing to express our concerns and request full coordination of work on all horse mackerel (*Trachurus trachurus*) stocks following the recent benchmark assessment. The benchmark has highlighted several critical issues that need immediate and unified attention to ensure the sustainable management of these stocks.

Firstly, we are concerned about the current segmentation in the analysis and discussion of horse mackerel stocks. The southern horse mackerel is managed under the Working Group on Southern Horse Mackerel, Anchovy, and Sardine (WHANSA), while the western and North Sea horse mackerel are discussed within the Working Group on Widely Distributed Stocks (WGWIDE). This separation could lead to inconsistencies and inefficiencies in the assessment process. Therefore, we urge the European Commission and ICES to establish a clear and harmonised framework for assessing these three stocks collectively. Unified assessments would facilitate more accurate data interpretation and foster coherent management strategies across all regions.

Secondly, the benchmark has underscored significant data deficiencies, particularly concerning the North Sea and western horse mackerel stocks. There is an acute need for more specific surveys targeting these stocks to address these gaps. The lack of robust data compromises the reliability of stock assessments and, consequently, the management decisions based on them. We recommend that targeted surveys be prioritized and adequately funded to enhance data quality and coverage.





Moreover, there is a pressing need to incorporate ecosystem elements and shifts affecting the fishing patterns and assessment of horse mackerel stocks, as climate change. The complexity of marine ecosystems and the interactions between species necessitate an ecosystem-based approach to fisheries management. However, the current benchmark raises numerous questions on how best to integrate these elements. We request that the European Commission and ICES provide clear guidelines and support for incorporating ecosystem considerations into the stock assessment processes.

Additionally, the management of by-catch Total Allowable Catches (TACs) remains problematic and unmanageable in the absence of a harmonized framework for the members states, as we previously highlighted in our PelAC recommendation on harmonising the implementation of the bycatch TAC for horse mackerel ([PelAC reference: 2223PAC75](#)). This issue requires urgent attention to develop practical and effective solutions that minimize by-catch and ensure sustainable fishing practices.

In conclusion, we call for the European Commission and ICES to coordinate efforts to harmonise the assessment and management of all horse mackerel stocks. Addressing the highlighted data deficiencies, improving survey efforts, and integrating ecosystem considerations are crucial steps toward sustainable fisheries management.

We look forward to your prompt action on these matters and PelAC is ready to assist in any way necessary to achieve these goals.

Thank you for your attention to this important issue.

Yours sincerely,  
Kind regards,

Sean O'Donoghue  
Chairman Pelagic Advisory Council

