

Ms Charlina Vitcheva

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Subject: Recommendations on 2025 fishing opportunities

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 2025” and to provide recommendations on Total Allowable Catches (TACs) in 2025 for stocks under its remit.

In case you have any questions, please do not hesitate to contact the Secretariat. Thanking you in advance for your kind consideration and looking forward to your response.

Kind regards,



Esben Sverdrup Jensen
Chairman Pelagic Advisory Council





General Considerations on fishing opportunities for 2025

Progress in achieving sustainable fishing in the EU

In its' Commission staff working document on fishing opportunities for 2025 the Commission defines a sustainably fished stock as, "A stock is fished sustainably at its MSY when the ratio between actual fishing mortality (F) and fishing mortality at MSY (F_{MSY}) is below or equal to one." According to the Communication, the number of stocks fished sustainably continues to increase year-on-year. The PelAC welcomes this and the Commission's underlining of fishers' efforts to manage fisheries responsibly. However, the PelAC has in previous advice requested that the impacts of climate change and pollution on pelagic fish be studied, as well as impacts from offshore wind energy infrastructure. This is not reflected in the Communication.

The Commission staff working document provides a graph showing the trends in fishing pressure from 2003-2022. For Northeast Atlantic stocks outside of EU waters, it shows a decrease in fishing pressure from 2003 to 2017, and an increase since then, putting fishing pressure above F_{MSY} . This graph underlines the impacts of not having a comprehensive sharing agreements between the Coastal States and the setting of unilateral inflated quotas by several Coastal States since 2017.

As repeatedly communicated, the PelAC is concerned about the current situation in the Northeast Atlantic in the absence of a sharing arrangement between Coastal States for the management of important widely distributed stocks. However, the PelAC acknowledges the Commission's attempts to reaching a sharing arrangement and supports the recent legislative proposal from the Commission¹ that would expand the EU's toolbox to address unsustainable fishing practices by non-EU countries. This is much needed given Norway and the Faroe Islands have continually set excessive, unjustified unilaterally set quotas, leading to systemic overfishing and putting the sustainability of the mackerel stock in question. This has been further worsened by the trilateral agreement between the UK and Norway and the Faroes which has seen UK transfer quota to these countries in exchange for access to UK waters. This deal has effectively bypassed the TCA.

The PELAC also notes that 2025 will also be a key year for mackerel as ICES will be carrying out a benchmark of this stock. PelAC members hope that this benchmark will clearly show the impact of the excessive unilateral quotas set by Norway and the Faroes. The PelAC will be providing advice on the benchmark in a future publication.

Landing Obligation

In the context of the landing obligation, the PelAC agrees with the Commission's statement on the importance of accurately recording all catches to ensure that ICES advice is using the best data available. The PelAC supports the provisions of the new control regulation which aim to ensure accurate weighing and registration of all catches but would welcome further dialogue with the Commission on the practical implementation of these provisions.

¹ [Press release: Commission proposes a revision of EU tools to address unsustainable fishing practices by non-EU countries on fish stocks of common interest](#)





However, the PelAC highlights that increased implementation and enforcement of the landing obligation, should not overlook the challenges posed by the landing obligation as underlined in previous advice. These include choke species, discard reporting requirements which are not adapted to the pelagic fishing industry, and issues in compliance with reporting requirements due to a lack of data².

The PelAC and EFCA jointly organised a workshop in January 2024 to discuss EFCA's report on the Evaluation of Compliance with the landing obligation in the mackerel fishery. During this workshop, PelAC members underlined a series of shortcomings leading to misinterpretations in terms of assessing the risk of non-compliance. The most important feedback related to the need to separate data between pelagic and demersal fisheries. The conclusions of the workshop led to increased cooperation between the PelAC and EFCA as well as leading to the PelAC joining the Remote Electronic Monitoring Working Group.

Finally, the PelAC would like to thank the EFCA for publishing the final landing obligation compliance report.

Economic performance of the EU fleet

As underlined in last year's document, the PelAC continues to stress the importance of ensuring better alignment between scientific advice and projections by STECF on the economic performance of the EU fleet.

PelAC members welcome the establishment by the Commission of the Energy transition Partnership. The first deliverables (Best Practices on energy transition in fisheries and aquaculture and the Guide and tool on financing the energy transition in fisheries and aquaculture) are of high quality. The PELAC awaits the final report as well as the study estimating the cost of replacing the whole EU fishing fleet with newer and more energy-efficient vessels. The PelAC would also like to underline the importance of ensuring sufficient capacity (GT and KW) is available to facilitate vessels transitioning to more energy-efficient engines. Additionally, PelAC members are keen to see the results of the Commission Pilot Project: Fostering energy transition in the fisheries sector (Demonstrator fishing vessel).

Long-term management strategies

The Commission Staff Working Document underlines the pivotal work carried out by the PelAC on the rebuilding plan for western horse mackerel. As underlined in previous advice, the PelAC has a strong record of contributing to the development of such plans for stocks under its remit since its inception. The PelAC remains committed to developing such plans, with the longer-term objective of including ecosystem considerations, underlining the importance of implementing EBFM for European pelagic stocks. The PelAC also highlights the importance of conducting Management Strategy Evaluations as an additional process to evaluate and ultimately incorporate ecosystem considerations into the management of these stocks.

² https://www.pelagic-ac.org/wp-content/uploads/2022/04/2122PAC23-PelAC-Consultation-Review-CFP_2022.pdf





Quality assurance and the role of science

The PelAC would like to highlight the issue of Quality Control of ICES advice. The PelAC continues to have serious concerns regarding ICES quality control procedures and the slow reaction time to address significant assessment issues. One such issue is in relation to Irish Sea herring, where the outputs of the model, particularly in relation to the unusually flat F pattern, have been questioned multiple times but until recently have not been thoroughly investigated by ICES. It now appears that the SSB and resulting advice have been overestimated for the past seven years, with an unknown impact on both the Irish Sea and Celtic Sea herring stocks.

The PelAC would like to bring to the attention of the Commission the need to carry out a retrospective analysis on the impact of the incorrect assessment of Irish Sea herring leading to the issuing of inflated advice for the past seven years.

Implementation of EU legislation to address Climate Change and rebuild stocks

The Commission concludes its communication by insisting on the importance of Member States implementing EU environmental legislation. The PelAC supports this approach, as the good state of coastal areas are key for maintaining spawning and nurseries areas for pelagic fishes. Tackling marine pollution will be central to ensure the rebuilding of fish stocks. The PelAC underlines the ICES non fisheries conservation considerations and the importance of its uptake to ensure the rebuilding of fish stocks. For example, in relation to the impacts of gravel extraction and the siting of offshore wind farms on herring in the North Sea, *“ICES advises that no activities on spawning habitats should be allowed unless the effects of these activities have been assessed and shown not to be detrimental.”*³

Building on ICES advice, the PelAC suggests that the implementation of anthropogenic activities in spawning habitats should be stopped and that funding be provided for the identification and safeguarding of such areas. More specifically, the PELAC calls on Member states to adopt a precautionary approach in this regard, by not allowing the development of large-scale activities in known spawning grounds until the impacts are fully understood. This includes Offshore Renewable Energy developments.

³ ICES. 2024. Herring (*Clupea harengus*) in Subarea 4 and divisions 3.a and 7.d, autumn spawners (North Sea, Skagerrak and Kattegat, eastern English Channel). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, her.27.3a47d. <https://doi.org/10.17895/ices.advice.25019285>





Stock by Stock considerations

Atlanto Scandian herring

The PelAC encourages the Commission and Member States to seek a rapid agreement with all Coastal States on a sustainable long-term sharing arrangement for this stock. The current situation with no agreed sharing arrangement is unsustainable in the long-term given catches have consistently been in excess of the scientific advice in the last few years.

The PelAC is seriously concerned over the impacts of this current TAC overshooting. Therefore, the PelAC urgently recommends the Commission to encourage Coastal States to revisit the management plan currently in place for this stock and request ICES assess the measures and level of fishing effort necessary to avoid the scenario of the stock falling below Blim. When revising the LTMS of Atlanto-Scandian herring, the PelAC recommends the Commission request ICES to undertake a MSE process that would generate scenarios showing the impacts of the current TAC overshoots.

The PelAC recommends that any revision of the LTMS for Atlanto-Scandian herring should ensure that the implementation of the revised LTMS is considered precautionary by ICES. The LTMS must be in line with the internationally agreed objectives of fishing at or below levels that can produce MSY to achieve long-term sustainable fisheries, as well as taking an ecosystem-based approach to fisheries management that considers ecosystem and climate-driven changes in the productivity of Atlanto-Scandian herring in the Northeast Atlantic. Particularly, any LTMS revision should also aim to secure the stock's role in maintaining healthy food webs in the ecosystem, consistent with the ecosystem-based approach.

The PelAC is worried about the inclusion of data from countries that have seen their membership to ICES removed. While ensuring that reported data is of high quality is the responsibility of the Member State reporting the data, the PelAC stresses the need to ensure that non-ICES Member States still follow the ICES Transparent Assessment Framework (TAF) process.

Moreover, the PelAC underlines that ICES has consistently highlighted in the advice for this stock, that *"considering the consistent overshooting the advice cannot be considered as precautionary"*. The PelAC stresses the need as part of the 2025 benchmark, to carry out a retrospective analysis to consolidate the advice.

Despite the concerns expressed, the PelAC recommends following the ICES advice based on the agreed Long-Term Management Strategy and setting the TAC at 401 794 tonnes in 2025.

North Sea autumn spawning herring

The PelAC urges the EU, UK and Norway to finalise the development of a Long-Term Management Strategy in accordance with the CFP and the latest scientific advice. This LTMS should form the basis for future scientific advice.

The PelAC underscores that the development of the LTMS should consider the most recent stock dynamics, long-term stability and sustainability of the fisheries, as well as climate and ecosystem factors (e.g. food web dynamics). This would help to avoid unstable TAC setting seen in recent years (i.e. +45% in 2022, -22% in 2023, +28% 2024 and now -22.5% for 2025).





The PelAC encourages the Commission to explore all management measures in close consultation with the PelAC, and in cooperation with ICES and the relevant Coastal States, considering all relevant ecosystem components.

The PelAC requests that special attention be given to ICES non fisheries conservation consideration. ICES underlines that *"no activities on spawning habitats should be allowed unless the effects of these activities have been assessed and shown not to be detrimental"*. The PelAC underlines that activities such as gravel extraction or wind farm development are included in ICES' consideration. The PelAC would like to underline that gravel substratum is an essential habitat for herring spawning in autumn and these non-fisheries forms of spawning habitat degradation may decrease the early life-stage survival of herring. The PelAC recommends that more research be developed to better assess the effects on the herring stock and recruitment of ORE development and gravel extraction.

The PelAC recommends that the Commission, Member States and ICES evaluate the effects of special management measures introduced in both herring and industrial fisheries in ICES division 3a in 2023 in order to minimise the risk of unavoidable bycatches of Western Baltic Spring Spawning herring.

The PelAC further encourages the Commission to request from ICES an overview of possible temporal and spatial management measures options for the directed herring fisheries in the North Sea and ICES division 3a and related fisheries with unavoidable by-catches of WBSS herring, in order to secure a balance between minimising unwanted fishing pressure on this stock, while allowing for sustainable exploitation of the North Sea herring stock.

The PelAC recommends following the ICES advice and setting the TAC at 412 383 tonnes in 2025.

Herring in 6a North & Herring in 6a South and 7b-c

The advice on herring in 6a North & herring in 6a South and 7b-c is yet to be published. The PelAC will be providing its recommendations once the advice is released at the end of October.

Celtic Sea herring

The PelAC recommends following the ICES advice and setting the TAC in 2024 at 0 tonnes. However, the PelAC recommends continuing the scientific sampling programme in accordance with the ICES recommendation for a monitoring TAC of 869 tonnes. This will ensure the continued scientific monitoring of the stock.

Irish Sea herring

As for herring in 6a North & Herring in 6a South and 7b-c, the advice is yet to be published and the PelAC will be providing its recommendations at a later stage. As for the Celtic Sea stock, the PelAC recommends that the issues of mixing between both stocks be addressed.

The PelAC recommends that an urgent benchmark be conducted for the Irish Sea and Celtic Sea herring stock assessments. This follows from ICES re-issuing the 2024 advice that revealed significant errors in the Irish Sea stock assessment. A benchmark is needed to assess the impacts of overestimation of the Irish Sea stock, the unquantified mortality of the Celtic Sea stock, and calls for ICES to assess the stock mixing and management options to support informed decision-making for both stocks. A letter has been sent to the Commission by the PelAC underlining the issues with the ICES advice.





Blue whiting

The PelAC encourages the Commission and Member States to seek a rapid agreement with all Coastal States on a sustainable long-term sharing arrangement for the stock. The current situation with no agreed sharing arrangement is unsustainable in the long-term given catches have consistently been in excess of the scientific advice in the last few years.

The PelAC is seriously concerned over the impacts of this consistent TAC overshooting. The PelAC urgently recommends the Commission encourages Coastal States to revisit the management plan currently in place for this stock and request ICES to identify measures and levels of fishing effort needed to avoid the scenario of the stock falling below Blim. When revising the LTMS, the PelAC recommends the Commission requests ICES to undertake a MSE process that would generate scenarios that demonstrate the impacts of the current TAC overshoots.

The PelAC recommends that any revision of the LTMS for blue whiting should ensure that the implementation of the revised LTMS is considered precautionary by ICES. The LTMS must be in line with the internationally agreed objectives of fishing at or below levels that can produce MSY to achieve long-term sustainable fisheries, as well as taking an ecosystem-based approach to fisheries management that considers ecosystem and climate-driven changes in the productivity of blue whiting in the Northeast Atlantic. Particularly, any LTMS revision should also aim to secure the stock's role in maintaining healthy food webs in the ecosystem, consistent with the ecosystem-based approach.

Moreover, the PELAC notes the ICES advice warns of a possible period of low recruitment in the years ahead. This is of high importance as the recent SSB trends have shown a decrease in recent years. The PelAC is also concerned with the small average size of fish caught in this fishery over the past year.

The PelAC recommends that the Commission bring the influence of the subpolar gyre and wind stress factor to the attention of ICES for consideration in future stock assessments.

The PelAC supports the ICES advice and that the TAC be set at 1 447 054 tonnes.

Boarfish

The PelAC would like to underline the important role members have played in the benchmark process for this stock resulting in the assessment moving from a category 3 to a category 1.

The PelAC is fully committed to working on the development of a Long-Term Management Strategy for Boarfish and carrying out a MSE.

The PelAC recommends that the TAC for boarfish be set in line with MSY at 38 295 tonnes for 2025.

Northeast Atlantic Mackerel

The PelAC expresses its deep concern about the continuing risk of certain Coastal States setting excessive unilateral quotas, leading to mackerel catches significantly exceeding the advised Total Allowable Catch (TAC). This has happened in every year since 2010 by up to 40%.

The PELAC highlights that the 2024 agreement between the UK, Norway and the Faroes, rather than solving the problem, attempts to legitimise the setting of excessive and inflated unilateral quotas by some parties in recent years and rewards continued overfishing based on these inflated quotas, which deviate significantly from the shares applicable under the last sharing agreement dating back to 2014. It is now clear that, in the absence of a comprehensive agreement between all Coastal States,





there is a real and immediate danger that the setting of excessive and inflated quotas will continue, and jeopardise the future sustainability of the stock. The PELAC notes that the EU is the only Coastal State that has not set a unilateral quota and catches have remained in line with the quota set.

Given the most recent ICES advice, the PelAC is very concerned about the risk of the stock falling below Blim in the long term, leading ICES to issue zero catch advice. The PELAC highlights this risk will increase significantly if Coastal States continue to set unilateral quotas. The PelAC stresses the importance of the Commission addressing this issue

In this context, the PelAC reiterates the urgent need for the Coastal States to adopt:

- A comprehensive sharing agreement respecting historic catch levels and ensure the MSY advice is not exceeded;
- A Long-Term Management Strategy (LTMS) that is deemed precautionary by ICES and consistent with the internationally agreed objectives of fishing below MSY levels. This LTMS should be based on F_{target} and $MSY_{trigger}$ that give additional stability to catches in the medium to long term. The LTMS should follow an ecosystem-based approach to fisheries management that considers ecosystem and climate change in mackerel productivity in the North-East Atlantic. The LTMS should also aim to ensure the role of the stock in maintaining healthy food webs in the ecosystem, in line with the ecosystem-based approach.
- The PelAC stresses the urgent need to bring forward a Management Strategy Evaluation (MSE) considering these variables, to help improve stock management decisions. This should include a set of robustness/sensitivity scenario tests that take into account existing uncertainties or plausible implementation errors, such as catches made in excess of the TAC.

The PelAC recommends following ICES advice on MSY and setting the TAC for North-East Atlantic mackerel at 576 958 tons in 2025.

The PelAC notes that ICES has planned a benchmark for this stock at the beginning of 2025. The PELAC requests that Coastal States request ICES to reassess the mackerel assessment following this benchmark and that once this reassessment has been completed, the TAC be updated.

The PelAC suggests that ICES should develop and put in place a mechanism in place to allow for the incorporation of new relevant data as it becomes available outside of the benchmarking process.

The PelAC highlights that the issue of climate change and ecosystem changes affecting mackerel and fishing patterns should be incorporated into the comparative assessment of mackerel and requests the Commission to raise this issue for pelagic stocks. In this regard, the PELAC stresses that mackerel is not only important for fisheries, but it is also a critical species to secure healthy food webs of NE Atlantic ecosystem due to its role as prey for many predatory fish and other marine animals. The PELAC highlights that the rebuilding, protection and sustainable use of the mackerel stock is in accordance with the CFP and ecosystem-based fisheries management alongside with environmental policies and commitments such as: Maritime Strategy Framework Directive (MSFD) and Convention on Biological Diversity (CBD) Global Biodiversity Framework.





The PelAC highlights, that ICES concluded that contrary to the previous scientific advice they have identified that there is in fact only one mackerel stock component, not three as previously thought. This constitutes a major change in the perception of the stock and how it should be managed. The EU management regime for mackerel was designed since three stock components, including a small component in the Southern North Sea. This is no longer a valid approach.

The PelAC recommends that the Commission initiates a timely process to analyse and update all existing management measures to accommodate the new consolidated scientific perception of the stock. The PELAC suggests that the Commission adapt necessary legislation to ensure coherence. The PELAC highlights the need to consolidate conservation measures such as MCRS, and special conditions in areas 3 and 4 that were designed to protect a mackerel stock component that according to ICES does not exist. The PelAC is committed to engaging with The Commission and scientific institutions to facilitate this process.

Horse mackerel

The PelAC notes that the benchmark of the horse mackerel stocks carried out by ICES in 2024 highlighted several critical issues and significant data gaps that require attention to ensure the provision of accurate advice for the Western, southern and North Sea horse mackerel stocks. To fill these gaps, the PELAC highlights the need for specific studies targeting these stocks as identified in the benchmark report.

The PelAC recommends that dedicated horse mackerel surveys be prioritised and adequately funded to improve data quality and coverage to improve stock assessments and, consequently, the management decisions that are based on the advice. Unified assessments would facilitate more accurate interpretation of the data and promote coherent management strategies across all regions. A framework for the collective assessment of these three stocks should be discussed at THE MIACO meeting in January 2025.

In addition, there is an urgent need to integrate ecosystem elements and changes that affect fishing patterns and the assessment of horse mackerel stocks, such as climate change. The complexity of marine ecosystems and the interactions between species require an ecosystem-based approach to fisheries management. However, the current reference framework raises many questions about the best way to integrate these elements. We call on the European Commission and ICES to provide clear guidelines and support the integration of ecosystem considerations into stock assessment processes. This should be also discussed at MIACO meeting.

Western Horse Mackerel

PelAC recommends following the ICES advice and setting the TAC for 2025 at 75 545 tons.

The PelAC recommends the continuation and extension of the genetic stock identification work underway for this stock, noting the existence of mixed fishery with North Sea horse mackerel in the Channel.





Southern Horse Mackerel

The PelAC recommends following the ICES advice and setting the TAC for 2025 at 59 266 tonnes.

PelAC strongly believes the developing an update multiannual management strategy for this stock must be prioritised. Further, the PelAC recommends that the Commission submit a request to ICES to have the updated PelAC LTMS undergo a Management Strategy Evaluation. Elements such as the effect of climate change and the importance of this species to the ecosystem and specific role in the food chain should be tested in the MSE. Additionally, the long-standing issue of the TAC currently covering multiple species should also be addressed by the MSE evaluation.

North Sea Horse Mackerel

The PelAC recommends that the Commission include North Sea horse mackerel in its standing request on zero catch advice stocks to ICES with the objective of ensuring continuity in data collection for scientific purposes and maintaining a category one assessment for North Sea Horse Mackerel. The PelAC notes for other pelagic stocks where ICES has issued zero catch advice, an option of a scientific monitoring TAC option has been provided in the catch options table. However, this has not been the case for horse mackerel.

The PelAC underlines the need for continued data collection to feed into the assessment. As underlined in the ICES advice, the PELAC notes that the main survey feeding into the assessment are bottom-trawl surveys (NS-IBTS and FR-CGFS). These surveys are not commensurate to horse mackerel as the trawls used have low catchability rates for horse mackerel.

The PelAC underlines the importance of further developing genetic stock identification for horse mackerel to improve data collection that can then be used to improve the models. Genetic stock identification will also help understanding the mixing between the western and North Sea stocks in the English Channel (divisions 7d and 7e).

As described in the PelAC horse mackerel Focus Group held in March 2023, a long-term research plan has been discussed for implementation in the following years. The PelAC strongly appreciates that this plan was further worked on during the benchmark which proposed a five-year plan. This plan includes six key areas - stock identification, biological data, fisheries independent and dependent data, assessment development, benchmark planning. The PelAC requests the Commission and Member States support this highly relevant scientific research issues and guarantee that efforts will focus on ensuring continued development of the various horse mackerel stocks assessments up to and including the next benchmark process.

The PelAC urges relevant Member States and other Coastal States to put in place measures that minimise catches to support the recovery of the North Sea stock and that the vessels allowed to use monitoring quota are effectively monitored through a range of control measures. Moreover, if the EU and the UK set a by-catch TAC, as was the case for 2023 and 2024 in the case of western horse mackerel, it is imperative that the Commission and the Council ensure coordination and harmonisation of its implementation. In 2023 and 2024, the decision led to unforeseen practical issues in the implementation by Member States, jeopardising the level playing field. The PelAC addressed these issues in a previous letter to the Commission.





The PelAC recommends that the footnotes to the horse mackerel TACs contained in the fishing opportunities regulation be adapted to ensure consistency between the North Sea horse mackerel and the Western horse mackerel.

Atlantic chub mackerel

The PelAC notes that Atlantic chub mackerel stock(s), is one of the species under the remit of the AC. The publication of the last WKCOLIAS report has highlighted that the catches of this species have increased, while uncertainty about the status of the stock(s) remains. The fishery continues to be unregulated, apart from limited technical measures. The PelAC agrees with the WKCOLIAS conclusions that additional science and management measures are required to avoid unsustainable catch levels.

The PelAC recommends, that the Commission includes Atlantic chub mackerel in its MoU with ICES, more specifically under the recurrent advice work package.

