

Ms Charlina Vitcheva

Director General
Directorate General Maritime Affairs and Fisheries
Rue de la Loi 200
1049 Brussels
BELGIUM

Date: 27 March 2025

PelAC reference: 2425PAC24

Subject: Issues related to the implementation of bycatch TAC for North Sea Horse Mackerel

Dear Ms. Charlina Vitcheva,

On the 30th of September 2024, ICES published its advice on fishing opportunities for 2025. This advice recommends that when the maximum sustainable yield approach and precautionary approach are applied, there should be zero catch in 2025. This is due to the fact that fishing mortality is above Flim, and that the stock spawning biomass is below Blim. The advice from ICES follows a benchmark that was done in 2024.

The inclusion of this advice in the 2025 TAC and Quota regulation led to the implementation of a bycatch TAC set at 970 tonnes for 2025. A PelAC letter dated July 7, 2023 alerted your services on the challenges associated with harmonizing the implementation of the bycatch TAC for Western horse mackerel, the issues from this previous letter also apply to North Sea horse mackerel in 2025.

As additional quotas remain minimal, the implementation of this bycatch TAC has proved to be challenging across European Member States. Some Member States have imposed additional measures, such as the requirement for vessels to buy landing rights when landing this stock or a ban on all sales for human consumption. In a similar fashion to our 2023 letter, the PelAC would like to highlight the importance of harmonisation in the implementation of this regime in order to ensure a level playing field between European fishing fleets.

North Sea horse mackerel is a category 1 stock, allowing ICES to provide advice that follows the MSY approach. However in order to do so, this requires that sufficient data is provided from surveys and from catches. The PelAC was made aware that the Commission had sent a request to ICES requesting them to provide advice on the minimum level of catches required in a monitoring TAC, which would provide sufficient data for ICES in order to continue providing scientific advice on the state of North Sea horse mackerel stock. The PelAC welcomes this request and hopes that ICES's advice will be swiftly implemented once it is made available.



We thank you in advance for your prompt attention to this matter and would welcome the opportunity to discuss it further with the dedicated DGMARE unit in a meeting rather than through a written response. The PelAC will contact DGMARE services to arrange a suitable time for this discussion.

Kind regards,

Esben Sverdrup-Jensen
Chair of the Pelagic Advisory Council

