

Ms Charlina Vitcheva

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Directorate General Maritime Affairs and Fisheries
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1049 Brussels
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Date: 2 October 2026
PelAC reference: 2627PAC02
Subject: Recommendations on 2027 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 2027” and to provide recommendations on Total Allowable Catches (TACs) in 2027 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
Chair of the Pelagic Advisory Council





Annex 1: PelAC response to the 2027 fishing opportunities communication

Economic performance of the EU fleet

The PelAC would like to underline that the 2026 catch recommendations for widely distributed stocks have had significant social and economic repercussions on the fleets concerned in each Member State. These repercussions also impacted coastal communities dependent on these stocks and the rest of the fisheries supply chain that rely on mackerel and blue whiting: fish auctions, processors, suppliers and shipyards. In this context, the PelAC recommended that the Commission request a socio-economic impact assessment of the reduction on the European Fisheries Sector.

As underlined in previous year's document, the PelAC continues to stress the importance of ensuring better alignment between the scientific advice data and future projections by STECF for the economic analysis of the fleet.

The State of EU fish stocks

Due to a lack of figure in the Commission communication, the PelAC has chosen to comment the conclusions of STECF Adhoc-26-01¹, outcome of Article 50 of the Common Fisheries Policy².

The PelAC notes the changes to the computation of the indicators, and welcomes the addition of a new selectivity indicator, the use of the median instead of the geometric mean, and the standardisation of the biomass indicator.

The PelAC wishes to echo the conclusions of the report that do not appear in the Commission communication:

1. The STECF report notes a decrease in recruitment over the past two years for various stocks, visible across all ecoregions. This decrease may be due to environmental changes.
2. The STECF's selectivity indicator suggested a deterioration of selectivity until 2010, followed by an improvement until 2017, and then a stable or slightly deteriorating trend since then.
3. The STECF report regrets that in its model, a small stock with low catches or biomass has the same weight as a large stock. The PelAC supports this statement, in the context of non-EU waters, the F indicator averages 1 despite continued overfishing practices by non-cooperating parties on the mackerel stock. This is a disservice to European fishers as it gives the impression that shared stocks are fished sustainably when it is not the case.

Furthermore, the PelAC echoes its comments from the previous year:

¹ European Commission, Joint Research Centre, Scientific, Technical and Economic Committee for Fisheries (STECF) Monitoring the Performance of the Common Fisheries Policy (STECF-Adhoc-26-01), Publications Office of the European Union, Luxembourg, 2026, doi:XXXXXXX, JRCXXXXXX.

² Article 50 of the Common Fisheries Policy (CFP; Regulation (EU) No 1380/2013) of the European Parliament and of the Council of 11 December 2013 stipulates: *"The Commission shall report annually to the European Parliament and to the Council on the progress in achieving maximum sustainable yield and on the situation of fish stocks, as early as possible following the adoption of the yearly Council Regulation fixing the fishing opportunities available in Union waters and, in certain non-Union waters, to Union vessels."*





The STECF report uses data exported from the ICES website on 22 January 2026, corresponding to advice provided by ICES in 2025 for 2026 fishing opportunities. However, the data included in the report cover the years 2003–2024, and the forecasted values for 2025 used by ICES in its advice are not included. Therefore, the report does not use the most up-to-date data from ICES and its utility as a forward-looking evaluation is limited. Since the Commission's communication is published in early June, at the same time as ICES advice for the following year, both reports have presented different realities in recent years. This is challenging, as the STECF report is not considered by the Commission in setting fishing opportunities for the following year. Therefore, PelAC suggests that either:

- The STECF analysis is delayed until the most up-to-date data is available. or
- The report be published earlier or on a bi-annual basis to avoid confusion with ICES advice released in the summer.

Coastal States arrangements

As repeatedly communicated, the PelAC remains concerned about the current situation in the Northeast Atlantic, particularly the absence of sharing arrangements between Coastal States for managing widely distributed stocks.

The PelAC strongly denounces the 2025 partial agreement between Norway, the UK, Iceland, and the Faroe Islands. The partial agreement leaves no room for the EU's historical catch levels. Furthermore, the non-cooperating parties base their approach on the principle of zonal attachment, failing to correctly encompass the complexity of Coastal States stocks and their subsequent fisheries.

However, the PelAC welcomes the Commission's approach to reaching sharing arrangements with Coastal States which follow a long-term ecosystem-based approach to fisheries management and supports the introduction of new trade-based measures to act as a deterrent to irresponsible fishing nations to desist from overfishing of these stocks.

This is urgently needed, given that Norway, the Faroe Islands, and Iceland have continued to set excessive, unjustified unilateral quotas, leading to systemic overfishing and jeopardizing the sustainability of the mackerel stock. Increased fishing effort by Russia in international waters, which remains subject to no control or monitoring, has exacerbated the problem. The PelAC underlines the importance of selected trade measures use to ensure that long-term sharing arrangements can be agreed upon and that unilateral actions by non-EU Coastal States cease. This may not necessarily be effective in the case of Russia. Finally, the PelAC notes that access to EU waters should be conditional a successful conclusion of relevant Coastal States sharing arrangements.

Long term management strategies

Contrary to the previous year's communication and staff working document, this year's iteration does not mention long term management strategies. The PelAC will keep working on LTMS for stocks under its remit and call for the use of Management Strategy Evaluations to design and approve them. Future MSEs will need to include, where appropriate:

- climate considerations,
- the species' role in the food chain
- implementation errors.

All future Long-term Management Strategies developed by the PelAC





will need to be in line with the Ecosystem Based Fisheries Management. Following this suggestion, the PelAC suggests that the work of de Moor, Bessell-Browne and Plagányi that it reported on after its February workshop be used by the Commission when designing MSE requests. The report is available on the PelAC website³.

The PelAC will work on developing an LTMS for boarfish and hopes that the agreement on long-term sharing arrangement for shared stocks will provide the basis for a future LTMS.

Finally, the PelAC would like to suggest the inclusion of exceptional circumstances protocols in future LTMS in the event where the dynamics of the stock are outside the range of possibilities tested by the MSE.

Quality assurance and the role of science

Regarding Quality assurance and the role of science, the PelAC has consistently worked to improve quality control of ICES advice and address the issues and inconsistencies found in ICES publications. Last year, the PelAC highlighted the persistent errors found in the Irish Sea herring assessment. This year, the PelAC would like to highlight issues surrounding stock containment for 6a North and 6a South 7b-c herring stocks and boarfish.

For 6a North and 6a South 7b-c herring, the robustness of the advice requires the stock to be contained by the Malin Shelf Herring Acoustic Survey (MSHAS). This was not the case in 2026, where 6aN and 6aS, 7b-c herring migrated East of the 4-degree West line at the time of the survey, leading to reductions in the abundance of the stocks, and to a reduction in catch advice for 2027.

For boarfish, the Working Group on Widely Distributed Stock, after consulting WGIPS suggested the inclusion of boarfish data from acoustic surveys in the North Sea to the assessment. The PelAC supports this addition.

With climate change increasingly impacting stock delineation, species may extend their stock range into new waters and reducing their presence in others. In that sense, the use of genetic data to allocate samples to the right population may help maintaining data continuity at stock level, regardless of the geographic distribution. The addition of genetic data may require a new definition of a stock, beyond one species, one area.

In line with its previous year's advice, the PelAC would like to reiterate its suggestion of designating more than a single stock assessor for each stock, and if possible, from multiple scientific institutes. Doing so would ensure that the stock can still be assessed, and advice can still be published if the stock assessor is ill or is unable to carry out the assessment.

The PelAC would like to stress the importance of investing in modelling and scientific resources alongside data collection. EU funds have been massively invested in data collection but ensuring that the data can be used is key, and training scientists to model and interpret the data. Ensuring that their respective needs are met will be essential.

The PelAC is aware of ongoing discussions by scientists within ICES about the feasibility of combining existing summer acoustic and swept area surveys (IESSNS, HERAS and WESPAS) for key pelagic species,

³ https://www.pelagic-ac.org/wp-content/uploads/2025/12/PelAC-MSE-Workshop-report_10.02.2026_final.pdf





including mackerel, herring and blue whiting, into a single synoptic survey. The PelAC strongly supports such an initiative as it would lead to a significant improvement in the understanding of stock dynamics and address many of the concerns raised by the PelAC related to stock identification and stock containment. The EU scientific institutes should be supported to play a leading role in the development of the proposed survey.

Finally, the PelAC was presented a proposal for a new format of ICES advice that would include catch by age and biomass at age graphs. The PelAC supports this new advice format and believes that the inclusion of catch and abundance at age graphs will ease the understanding and uptake of the advice by stakeholders.

Implementation of EU environmental legislation to improve the state of EU seas.

The 2026 summer was the hottest summer recorded in Western Europe. Temperature records were broken in Belgium, Denmark, France Germany, Ireland, the Netherlands and Spain⁴. Copernicus Marine Service⁵ notes that record high conditions were observed along parts of the European Atlantic coastline, with the strongest and most persistent events developed in the waters west of Europe. The impact of the severe heatwaves remains to be seen, but droughts diminish the input of nutrient in the system⁶, leading to possible impacts on future recruitment. Rebuilding EU fish stocks will require additional measures to address Climate Change.

In line with its previous advice, the PelAC would like to stress the importance of implementing EU legislations to improve the state of EU seas. The PelAC has provided its input to the revision of the MSFD in a dedicated advice⁷.

⁴ <https://www.severe-weather.eu/global-weather/heat-dome-warm-wave-heatwave-may-summer-2026-forecast-europe-mk/>

⁵ <https://marine.copernicus.eu/press/press-releases/persistent-ocean-warmth-and-expanding-marine-heatwaves-mark-first-half-2026>

⁶ The overlooked impacts of freshwater scarcity on oceans as evidenced by the Mediterranean Sea
<https://www.nature.com/articles/s41467-024-54979-4>

⁷ https://www.pelagic-ac.org/wp-content/uploads/2026/07/2526PAC59_PelAC-MSFD_Revision_advice.pdf





Annex 2: Stock by Stock considerations

Atlanto Scandian herring

The PelAC recommends following the ICES advice based on an agreed Long-Term Management Strategy and setting the TAC at 588 004 tonnes in 2027, an increase of 10.1% compared to 2026.

The PelAC notes that the advice confirms the strong 2023-year class is having a positive impact on spawning stock biomass and surveys indicate that the 2024-year class is strong, with additional recruitment being reported from the Barents Sea. However, as with mackerel and blue whiting, substantial overshoots of fishing opportunities remain of significant concern.

The PelAC reiterates that the Commission and Member States should 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 principles is not sustainable in the long-term.

In the current Coastal States consultation, the PelAC strongly disagrees with attempts from Norway and the Faroes to exclude the EU from the negotiations claiming the EU is not a Coastal State with respect to ASH. This has translated into a lack of access for EU vessels to Norwegian waters since 2021. The PelAC stresses the EU should either seek to restore access in line with levels it previously paid for or seek reestablishment of its quota share to pre-2007 levels.

The PelAC recommends the Commission encourages Coastal States to evaluate the LTMS currently in place for this stock through a Management Strategy Evaluation (MSE). ICES should be requested to consider management strategies that avoid the scenario of the stock falling below Blim and to restore and maintain it above MSYBtrigger.

The MSE should also generate scenarios that specifically simulate the impacts of current consistent TAC overshoots. In this context, the PelAC highlights that for some time, ICES has underlined that failing to adhere to the advised catches as derived from the application of the long-term management strategy may mean the LTMS is no longer precautionary.

The PelAC recommends that the Commission ensure any revision of the LTMS for Atlanto-Scandian herring is designed to meet ICES' Precautionary Approach. This should align with the internationally agreed objectives of fishing at or below levels that can produce MSY while also promoting long-term sustainable fisheries. The approach must integrate ecosystem-based approach to fisheries management, accounting for ecosystem and climate-driven changes in the productivity of Atlanto-Scandian herring in the Northeast Atlantic. This will secure the stock's role in maintaining healthy food webs in the ecosystem, consistent with an ecosystem-based approach.

Blue whiting

The PelAC recommends following the ICES advice based on the agreed Long-Term Management Strategy and setting the TAC at 1 064 191 tonnes in 2027 an increase of 25% compared to 2026.

The PelAC notes that the ICES advice indicates an improving situation for 2027. Stock biomass has been forecasted to increase from 2026 to 2027, as a result of improved recruitment, evidenced by strong incoming year classes.





The PelAC welcomes the upcoming ICES benchmark assessment and will provide further dedicated advice on the benchmark request at a later stage, following discussions among the PelAC members. As preliminary comments, the PelAC suggests the benchmark focuses on improving the accuracy of recruitment estimations and expanding data collection to include information from the industry. Additionally, as part of the benchmark, the PelAC recommends that consideration be given to incorporating data from other surveys into the assessment (e.g. IESSNS). Currently, there would appear to be an overreliance on a single survey (IBWSS), which has led in recent years to wide variability in the advice for the stock.

The PelAC reiterates that the Commission and Member States should continue to push the other Coastal States for a 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. Any comprehensive sharing arrangement should reflect the EU's genuine and traditional interest and historical track record.

The PelAC notes the use of zonal attachment by other parties in the sharing arrangement discussions fails to correctly encompass the complexity of blue whiting and its subsequent fisheries. Further, the PelAC also stresses its concerns at the continued protection of the Russian reserve by other parties, as well as the lack of monitoring and control of Russian vessels operating in the blue whiting fishery in international waters.

The PelAC recommends in the Coastal State negotiations on the management of the blue whiting stock, the Commission advocates that any revision of the LTMS follows the ICES' Precautionary Approach. The LTMS should align with the internationally agreed objectives of fishing at or below levels that can produce MSY while also promoting long-term sustainable fisheries. The approach must integrate ecosystem-based approach to fisheries management, accounting for ecosystem and climate-driven changes in the productivity of blue whiting in the Northeast Atlantic.

Further, any LTMS revision should aim to secure the stock's role in maintaining healthy food webs in the ecosystem, and be consistent with the ecosystem-based approach. The LTMS should be preceded by a Management Strategy Evaluation to identify measures and levels of fishing effort needed to avoid the scenario of the stock falling below Blim and to maintain it above MSYBtrigger. The MSE should consider the impact of climate change and ecosystem shifts on stock distribution and recruitment.

The PelAC notes that blue whiting is utilised for both human consumption and the production of fishmeal and fish oil, with the relative allocation between these markets varying between fleets and countries. Several countries participating in the fishery have increased landings for human consumption, including through fishing strategies targeting older fish. The PelAC recognises the value of developing markets for blue whiting, while also noting its important role as a raw material for European fishmeal and fish oil production. The PelAC supports fishing and utilisation strategies that maximise the long-term value derived from the resource, taking into account market conditions, product quality and the different uses of the catch.

Boarfish

The PelAC supports the ICES advice of 33 543 tonnes, based on the MSY approach and representing a 13% increase compared to last year's advice.





The PelAC reiterates that the boarfish stock has increased significantly since 2019, and its spawning stock biomass is now approximately twice that of during the peak of the pre-management fishery in 2010. Stakeholder feedback indicates a considerable expansion in the distribution of this enlarged stock biomass. This is further confirmed by the inclusion of North Sea survey data in the boarfish assessment.

While supporting the advice, the PelAC stresses there are serious concerns regarding the acoustic survey (WESPAS) index that is a major input into the boarfish assessment. The 2026 WGWIDE report notes that a technical issue with the acoustic equipment on the survey vessel resulted in lower than observed acoustic energy being returned by boarfish shoals, leading to an underestimate of biomass of boarfish and other species (herring, horse mackerel and blue whiting) during the survey.

This issue resulted in the ICES Working Group on International Pelagic Surveys (WGIPS) concluding that the 2026 survey data should not be included in the assessment for producing the catch advice for 2027. This has limited the robustness of the assessment for 2027, at a time when the pelagic industry reports an ever-increasing abundance of boarfish on fishing grounds.

The PelAC further highlights a similar issue may have occurred in the 2025 WESPAS survey. The analysis of that survey showed a decrease in the acoustic density of boarfish shoals across the survey area despite a similar number of shoals being detected over an increasingly wide distribution. The survey was retained in last year's assessment as a valid data point, but the issues identified in 2026 raise significant doubts as to the validity of this data point.

These survey issues need to be fully and transparently investigated and the implications of any potential underestimations taken into account of in future assessments of boarfish and other species impacted. Therefore, the PelAC requests ICES should review the 2025 data point. If it is found to be erroneous, then a special request should be drafted by the Commission and the UK, as joint managers of this stock. Depending on the extent of any errors uncovered, then ICES should consider an in-year revision of the previous 2026 advice and re-visit the advice for 2027.

The PelAC notes that fishing mortality is set at an extremely low level relative to the SSB. The PelAC understands this is primarily due to boarfish recruitment being defined as spasmodic, which means that episodes of strong recruitment are infrequent and irregularly occurring. While the PelAC acknowledges this is in line with the precautionary approach, appropriate fishing mortality levels should be explored as part of the MSE being worked on by the PelAC with the Irish Marine Institute.

In this context, the PelAC highlights the PhD study project by the Irish Marine Institute that aims to provide a better understanding of the recruitment drivers and diets of boarfish. This study should inform the MSE on recruitment patterns for boarfish.

The PelAC recommends that the Commission and the relevant authorities ensure in the development of the LTMS for boarfish will be designed following the ICES' Precautionary Approach. It should align with the internationally agreed objectives of fishing at or below levels that can produce MSY while also promoting long-term sustainable fisheries. The approach must integrate ecosystem-based approach to fisheries management, accounting for ecosystem and climate-driven changes in the productivity of boarfish in the Northeast Atlantic. The MSE should consider that boarfish is a long-lived species with uncertainty related to its vulnerability to fishing pressure.





Northeast Atlantic Mackerel

The PelAC recommends that the EU follow the ICES advice in full, with catches of no more than 352 938 tonnes in 2027, and that this figure be treated as a ceiling on the combined catches of all parties, including catches taken in international waters. Respecting that ceiling requires the downward recalibration of the quotas set above historical shares by other parties; it cannot be achieved through a reduction of the EU's share, which is not the adjustment variable of these consultations.

SSB is projected to move above Blim in 2027, and the incoming year class points to improved recruitment. This is a welcome development, but it does not resolve what brought the stock below Blim in the first place: the level of total catches. In 2026, in the absence of a comprehensive sharing arrangement, the Coastal States set quotas amounting to approximately 108 % of the agreed TAC of 299 010 tonnes, while the Russian Federation set a unilateral quota of 67 500 tonnes – some 20 % of that TAC. The catch advised for 2027, although more than double the advice for 2026, therefore remains below the total catches expected for 2026. An increase once again absorbed by unilateral quotas would leave the stock on the same trajectory. EU is the only Coastal State to have consistently respected both its historical share and the scientific advice, and it must not again be placed in the position of aligning itself, after the fact, with a TAC decided by others⁸.

The PelAC does not support the use of zonal attachment as the main basis for a mackerel sharing arrangement. There are multiple gaps and uncertainties in the data on geographical distribution of the mackerel stock in the Northeast Atlantic and there is clear evidence of varying and very different migratory patterns. In this context, the PelAC contends that the Coastal States Working Group on geographic distribution has no added value. The report produced by this Group makes no valuable contribution to the science around this stock as it mainly provides an interpretation of the ICES advice to justify arguments for unilateral mackerel share claims based on zonal attachment, which the PelAC considers to be flawed and dimensional.

The PelAC will judge the 2027 outcome on the sum of total catches, not on the headline TAC.

Five conditions for a credible 2027 outcome:

1. **A comprehensive sharing arrangement**, based on the 2014 agreement, respecting historical shares and not rewarding the inflated unilateral quotas set in recent years. The PelAC shares the Commission's assessment that the recalibration of the increased shares set by Norway and the United Kingdom is the precondition for the EU's participation, and the means by which the sum of total catches are to be brought within the ICES advice, it supports recourse to negotiation at the highest political level and, if necessary, to independent mediation, and asks to be informed, ahead of the October consultations, of the state of play regarding Regulation (EU) No 1026/2012 and of the follow-up to the EU proposal tabled at NEAFC.
2. **Effective limits on catches in international waters**, applicable to all parties and agreed at NEAFC, in order to end Olympic fishing and to address unreported and unregulated catches.
3. **Alignment of EU technical measures** with the single-component perception of the stock: harmonisation of the MCRS for mackerel at 20 cm across all management areas in the Technical Measures Regulation, and removal of the special conditions MAC/*3A4BC, MAC/*03A, MAC/*04B and MAC/*04C from the 2027 fishing opportunities regulation, without prejudice to relative stability keys and historical arrangements.
4. **Rebuilding the stock and rebuilding the fisheries that depend on it.** The PelAC requests a STECF assessment across the whole chain of the overshoots of the scientific advice over the whole

⁸ The PelAC notes the coastal States set quotas in line with a TAC level exceeding the ICES headline advice equivalent to 299 010. In February 2026, the EU aligned its share with this TAC level to maintain a level playing field.





period during which other Coastal States have set unilateral quotas above their historical shares covering both their contribution to the present state of the stock and the economic benefit obtained by the parties responsible, set against the losses borne by the EU fishing industry. The two rebuildings cannot be separated: a biological recovery that arrives once the vessels, the processing capacity and the markets have gone will not restore the fishery. Assessing the ecosystem losses due to the overshoot of the scientific advice should also be carried forward.

5. **A survey and data basis that matches the distribution of the stock.** The 2026 survey, with its enlarged coverage, again shows a southward shift, while substantial parts of the stock's range remain unsurveyed. The PelAC recommends that the extension of survey coverage be supported, so that both the assessment and any discussion of the distribution of the stock rest on complete rather than partial data.

The PelAC's expectations regarding a long-term management strategy, and its suggested request to ICES for a Management Strategy Evaluation, are set out in its dedicated advice⁹; the present recommendation is complementary and does not repeat them. This rebuilding plan must be ambitious: it should integrate an ecosystem-based approach, account for the impacts of climate change on mackerel productivity in the North-East Atlantic, safeguard the stock's role in maintaining healthy food webs, control the uptake in the international segment, and immediately reverse the declining trend – and aim to rebuild the biomass sustainably above MSYBtrigger as soon as possible.

Its positions on the state of the stock and on the conduct of the Coastal States negotiations remain those of its benchmark advice of July 2025¹⁰ and of its letter of 13 February 2026¹¹.

The PelAC would welcome a reply addressing each of the five points above.

Horse mackerel stocks

General comments:

The data gaps identified by the 2024 ICES benchmark remain largely unaddressed. The PelAC asks that the framework for a coherent assessment of the three stocks be concluded at the MIACO meeting of January 2027, and that the Commission and the Member States report on the implementation and funding of the five-year research plan set out in the WKBHMB 2024 report, to which the industry contributes substantially through the genetic stock-identification work.

As ICES restates in its 2027 advice, the management of several *Trachurus* species under a combined TAC prevents effective control of single-species exploitation rates and could lead to the overexploitation of any of them; where the TAC is the limiting factor, it also constrains catches of the species actually assessed. The PelAC recommends that the fishing opportunities regulation be adapted to provide for a TAC consistent with the stock ICES assesses, and that ecosystem and climate-driven changes in distribution and productivity be integrated into the assessment framework.

Western horse mackerel

The PelAC recommends following the ICES advice and setting the TAC at 79 223 tonnes in 2027, based on the MSY approach.

⁹ PelAC advice 2627PAC03, request to ICES for a long-term management strategy for NEA mackerel.

¹⁰ [PelAC advice 2425PAC80 on the 2025 ICES benchmark of NEA mackerel, July 2025.](#)

¹¹ [PelAC 2526PAC10, 13 February 2026.](#)





The PelAC welcomes the biological signals underpinning this advice, 6.7% above that for 2026: abundance has improved, individual weight and growth are good across age classes, and recruitment is now above the long-term average.

The PelAC has been informed of transducer calibration issues affecting the research vessel during the 2026 survey, and requests that ICES clarify their effect on the survey index and on the resulting advice. The lack of 2026 survey data point will have an impact on the 2027 assessment and this needs to be anticipated by ICES. More fundamentally, the absence of a dedicated survey remains the principal weakness of this assessment, the multi-species surveys relied upon being sub-optimal owing to species identification difficulties and to the absence of fecundity measurements in the egg surveys. The development of a targeted acoustic survey, conducted at the appropriate time of year, should be funded as a priority within the WKBHMB research plan.

The PelAC also draws attention to the evidence that the stock extends into ICES Division 9.a, which the assessment does not account for. Together with the genetic work on the boundary with the southern stock and the known mixing with the North Sea stock in divisions 7.d and 7.e, this cannot be settled stock by stock: the PelAC recommends that the delineation of the western and southern stocks be addressed at the next benchmark through a joint examination of both stocks, and that the genetic stock-identification programme be continued and extended.

Southern horse mackerel

The PelAC recommends following the ICES advice and setting the TAC at 59 950 tonnes in 2027, based on the MSY approach.

The PelAC notes that the ICES estimates catches of *T. trachurus* at 19 749 tonnes in 2025 against an advice of 59 266 tonnes. The PelAC recommends that the Commission establish, with the Member States concerned and STECF, whether this reflects market conditions, fleet capacity, the structure of the combined TAC or shortcomings in catch reporting, before any conclusion is drawn from catch data about the productive capacity of this fishery. On the combined TAC, ICES estimates that other *Trachurus* species made up 5 % of the catch in 2025 (1 047 tonnes) against 14 % the previous year: a variation of almost threefold in a single year is itself the clearest demonstration that such a TAC cannot provide a sound management basis.

The PelAC draws particular attention to ICES' statement that the management plan proposed for this stock, previously evaluated as precautionary, must be re-evaluated following the 2024 benchmark, and that no catch scenario is therefore presented on its basis. The PelAC's repeated call for an updated multiannual management plan is accordingly the implementation of an explicit finding of the advice. It recommends that the Commission initiate that revision without delay and request ICES to subject the revised plan to a Management Strategy Evaluation testing the effects of climate change, the ecological role of the species, the implications of the combined TAC structure, and providing FMSY ranges delivering no more than a 5 % reduction in long-term yield. In that sense, the PelAC welcomes the SWWAC Member States Regional Group letter to ICES requesting that Southern Horse mackerel be included in the Commission's multiannual TAC request.

Finally, the triennial DEPM survey planned for 2025 was postponed to 2026, leaving 2022 as the most recent estimate for that index. The 2025 IBTS survey was conducted from a different vessel, which, with the calibration issues affecting the western stock survey in the same period, raises a wider question of survey platform continuity that should be addressed through planning, documentation and inter-calibration. Spanish catches in the Gulf of Cádiz also remain outside the assessment for want of age data, and age sampling should be organised there.





North Sea horse mackerel

The Pelagic Advisory Council (PelAC) notes that, for the third consecutive year, ICES has advised zero catch for the North Sea horse mackerel stock. The PelAC recommends that the European Commission include this stock in its standing request to ICES on zero catch advice, with the explicit aim of enabling continued data collection for scientific monitoring purposes only. This would help maintain a category 1 assessment for the stock. PelAC emphasizes that, in other cases of zero catch advice, ICES has provided a scientific monitoring TAC option solely to support research and stock assessment continuity.

In its recommendations for 2026 the PelAC warned that the absence of an adequate data collection process risked the loss of the Category 1 assessment. That risk has now materialised: following the shift to a bycatch-only quota, biological sampling collapsed to some 4.3 % of catches sampled and that the assessment could be downgraded. The PelAC recommends that the Commission include this stock in its standing request to ICES on zero-catch stocks, with an explicit scientific monitoring TAC option.

The data problem cannot be solved by the bycatch quota alone: the surveys feeding the assessment are bottom-trawl surveys with low catchability for horse mackerel, and sampling derived from largely demersal bycatch carries the same bias. The PelAC therefore recommends that an acoustic survey be established in the English Channel, attached where possible to the December herring larval survey already carried out there, and that the genetic stock-identification work on mixing in divisions 7.d and 7.e be continued.

Where a bycatch TAC is set, the Commission and the Council must ensure coordination and harmonisation of its implementation: uneven application by Member States has previously undermined the level playing field and the issue remains unresolved. The PelAC further notes that vessels in some Member States have been tied up for lack of quota and that a prolonged prohibition would affect the viability of fisheries conducted on the same grounds and recommends that the socio-economic consequences be assessed alongside the biological ones.

