

17 November 2015

To: The Fisheries Ministers of the EU Member States

**Re: North Atlantic TACs at the EU Fisheries Council Meeting, 14-15 December 2015**

Dear Minister,

On behalf of the Fisheries Secretariat and Seas At Risk we send you our recommendations on 2016 North Atlantic and North Sea fishing opportunities relating to the European Commission's proposal COM (2015) 559, building on the latest advice from the International Council for the Exploration of the Sea (ICES). We ask you to endorse these recommendations at the upcoming Fisheries Council meeting in order to ensure more sustainable utilisation of our common marine resources.

In its proposal the Commission does not give a recommendation for Total Allowable Catches (TACs) for 88 of the main group of 153 TACs, mainly due to complexities related to the landing obligation. Unfortunately, the Commission fails to appropriately represent the objective of the reformed Common Fisheries Policy (CFP), to *bring biomass levels above*, rather than unambitiously *to*, those capable of producing MSY.

Your decisions on TACs are opportunities for you to firmly support the agreed CFP management objectives. With the initial 2015 deadline passed, it is your responsibility to set fishing opportunities **below** the exploitation level that corresponds with MSY ( $F_{MSY}$ ) as soon as possible, and by 2020 at the latest, in order to meet the main objective of the CFP. The extent to which this happens will be a measure of the Council's commitment to the agreed targets and, ultimately, sustainable and more profitable fisheries.

Regarding your decisions on the 2016 fishing opportunities we call on you to:

- Set catch limits in line with scientific advice, including limits based on the precautionary approach for data limited stocks without MSY assessment. Council has consistently set catch limits in excess of scientific advice, resulting in stock declines and long-term instability for those fisheries.
- Only grant a TAC uplift for any fleet segment subject to the landing obligation if Member States have provided sufficient, relevant data to the Commission to calculate a TAC uplift. Under no circumstances should the granted TAC uplift increase the fishing mortality of that fleet segment.
- Apply existing long-term management plans once they have been accepted by scientific review as being consistent with the MSY objective of the CFP.
- Align management areas with the assessment areas used in scientific advice, which will significantly facilitate MSY-based management of these stocks.
- Introduce bycatch reduction measures for fisheries with particularly high discard levels, in order to successfully facilitate implementation of the landing obligation. Also ensure effective monitoring and control of these measures.

Due to the large number of stocks covered by this proposal, we limit our specific recommendations to stocks which require close attention, as follows:

- For **anglerfish** stocks we urge you to follow the ICES (International Council for Exploration of the Sea) recommendation to manage the two anglerfish species under separate TACs to avoid overexploitation. There is evidence that fishing mortality is unsustainable on *L. piscatorius* in

divisions VIIIc and IXa. We recommend the following TACs in line with scientific advice: for divisions VIIb-k and VIIIabd no more than 10 757 tonnes for *L. budegassa* and 26 691 tonnes for *L. piscatorius*; for divisions VIIIc and IXa no more than 1 070 tonnes for *L. budegasse* and 1 343 tonnes for *L. piscatorius*.

- Due to the poor condition of all **cod** stocks in EU waters, we urge you to close or maintain fisheries closures in the Irish Sea (VIIa), West of Scotland (VIa), Faroe Bank (Vb2) and Faroe Plateau (Vb1). For the remaining cod stocks we recommend for Rockall (VIb) a reduction of the TAC to no more than 16 tonnes; for Kattegat (IIIa east) an increase to no more than 130 tonnes; and for the Southern Celtic Sea (VIIb,c,e-k) a reduction to no more than 3 569 tonnes. For TACs that include both EU and Norwegian quota we recommend increases to no more than 33 650 tonnes for the North Sea (IV, IIa); no more than 4 808 tonnes for Skagerrak (IIIa west); and no more than 1 961 tonnes for the Eastern English channel (VIId).
- Due to the poor condition of all **common sole** stocks, coupled with complications related to the implementation of the landing obligation, we ask you to follow our recommendation concerning TAC uplifts noted above, and we urge you to follow the Commission's proposal, which is in line with scientific advice, to close the fishery in the Irish Sea (VIIa).
- Allocations for **Northern and Southern hake** stocks are complicated due to the landing obligation, and overfishing is significant for the Southern stock. We ask you to follow our recommendation concerning TAC uplifts noted above.
- **Horse mackerel** stocks in the Northeast Atlantic suffer from continued poor recruitment, with any increase in TAC predicted to bring the stock below precautionary levels in 2016. However, the Southern stock is in good condition and can support a TAC increase. We recommend a rollover of 2015 TACs for both stocks in the Northeast Atlantic (VIII and divisions IIa, IVa, Vb, VIa, and VIIa-c, e-k) and an increase in the TAC for Atlantic Iberian Waters (IXa) to no more than 68 583 tonnes.
- **Pollack** TACs are regularly set well in excess of scientific advice, resulting in poor stock status. ICES again calls for significant cuts to allow rebuilding of these stocks. We recommend TAC reductions to no more than 120 tonnes for divisions Vb, VI, XII, XIV; no more than 4 080 tonnes for the English Channel (VII); no more than 978 tonnes for the Bay of Biscay (VIIIabde); no more than 152 tonnes for division VIIIc; and no more than 186 tonnes for Atlantic Iberian waters (IXa).
- For **skates and rays** we urge you to establish individual TACs for each species or species group based on the advice provided by ICES, and due to deteriorating or precautionary stock status across a wide range of stocks, an immediate precautionary reduction of all skate and ray TACs by 20%.

**The attached Annex provides more detailed rationale for the above recommendations.**

Yours sincerely,



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