

European Association of Fish Producers Organisations
Association Européenne des Organisations de Producteurs dans le secteur de la pêche



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EAPO Position Paper on 2015 TAC and Quota Proposals

Introduction

The Commission Proposal COM (2014) 670 published the 28th of October 2014 contains the Commission's proposals in relation to the setting of fishing opportunities for the majority of demersal and some pelagic stocks for 2014.

General Observations

Since the issuance of the ICES scientific advice based on a procedure agreed with the European Commission, it was clear for EAPO that for quite a lot of important stocks there would be substantial difficulties. Despite the discussions with the Commissions indicating the flaws in the advice procedure the proposal to the Council did hardly deviate from the starting point.

The Commission's proposal is mainly a reduction of catch opportunities with a rare increase, despite the admittance the state of the stocks in the North East Atlantic is generally improving. For EAPO this demonstrates that there is no consideration for the socio-economic reality. Accordingly the task to take into account all aspects for determining the fishing opportunities 2015 is put on the shoulders of the EU Fishery Ministers who will have to address the flaws in the Commission proposals in order to achieve a more logic approach to TACs and Quota.

EAPO emphasizes that this process is by no means a deviation from scientific advice but rather a correction of the Commission's interpretation of scientific advice. The recommendations below are aiming to assist the Council in addressing these issues.

Recommendations on Demersal Stocks Western Waters.

1. Stocks which are subject to a TAC reduction because of uncertainties in their assessment due to an information limited situation.

Some information limited stocks are not assessed at all due to a lack of funding of scientific entities. This situation is not improving. To the contrary there is less and less means available for marine research. For the stocks in this status EAPO does not accept an automatic 20% reduction in TAC which in five years' time could lead to an eradication of the fishing opportunities. Producers are being penalized while they have no control

over this situation. Therefore EAPO recommends a roll-over of the 2014 TACs of the following stocks: **Pollack VII, Pollack VIII and Whiting VIII.**

For other stocks the proposed 20% reduction is based on indications on the yield of the commercial fisheries or information on tendencies in biomass evolution. This is the case for **Monkfish VII and VIII, Megrim VII and VIII and Nephrops VIII.** Even if the reductions are less than 20% the proposals are hard to accept in view of the fact that this in contrast with the overall favourable trends of the stocks. Furthermore in its proposals the Commission uses the landings data as reference points instead of the TACs 2014. This would lead to a difference in approach of producers who have fully used their quota in 2014 and those who underutilized. For the five stocks mentioned in this paragraph it is important that the TACs 2015 reflect the observed biomass trends meaning an increase instead of the proposed decrease.

The Commission also proposes TAC reductions for **Skates and Rays VII (-20%) and VIII (-10%).** Although the explanation by the Commission of the background for such proposals is not clear EAPO understands that the information limited situation is due to the diversity of species making up these TACs. It appears however that the status of each individual species is well known and evaluated. Accordingly a logic approach would be to base the TAC proposals on the specific status of each species and their relative weight in the Skate and Ray catches.

The scientific advice for **Plaice VIId** is amalgamated from separate analyses of the Eastern (VIId) and Western Channel (VIle). It has also been established that there is a substantial migration to and from the North Sea. Both in the North Sea and in area VIle the Plaice stock is shown to be doing very well. In area VIId however, there appear to be shortcomings in the availability of scientific data. All this is translated into a Commission proposal to reduce the VIId TAC of Plaice by 14%. Also for this stock EAPO is requesting the application of a correct and realistic approach, which should lead to an increase of the VIId Plaice TAC, which according to the available scientific data is perfectly possible.

2. Stocks for which there is an ICES evaluation.

The European Commission propose a TAC reduction of 64% for **Cod VIIb-k,VIII.** This proposal is unacceptable because:

- It does not respect the ICES advice proposing a 41% reduction awaiting the results of the evaluation of the 2012 recruitment.
- It does not take into account the EAPO proposal for improvement of trawl selectivity for juvenile haddock and cod.

According to the results of the scientific observations by Irish and French scientific institutes in the Celtic Sea the Cod TAC 2015 should at least be retained at the 2014 level.

The initial proposal to reduce de **Haddock VII,VIII** TAC by 41% did not take into account the improved selectivity proposal presented by EAPO, aimed at releasing juvenile haddock and cod. The implementation of an increased mesh size for the square mesh panel as brought forward in the EAPO proposal could lead to a 40% reduction of discards of juvenile haddock and contribute significantly to the reduction of fishing mortality of this species. STECF has subsequently revised the advice based on improved selectivity and an amended F_{msy} which could result in a proposal for a TAC reduction of 14%.

Despite the fact that the **Northern Hake** stock is maintained at the historical apex in terms of abundance, the Commission's proposal, by rigidly applying the MSY, involves a 4.1% reduction in fishing opportunities for 2015. ICES in turn, by practically maintaining

the evaluations and trends in the stock biomass, acknowledges that it is unaware of the total for this species not landed although caught and, consequently, assumes that the catches to be landed in 2015 may be somewhat over the 78,457 tonnes maintained in its forecast. Moreover, nor does it give a good explanation for the upturn in fishing mortality as noted by ICES, when the real situation is that the fishing effort of the main fleets continue with a falling trend, with important reductions in fishing units due to the permanent withdrawals process. Lastly, it should be pointed out that, in accordance with the activity of the fleets, both in terms of total catches and of the CPUE, the stock is maintained at its best results, making it possible in 2015 to maintain the same TAC as in 2014.

For **Sole VIIg** ICES and the European Commission propose a 35% TAC reduction. This stock is reported having a positive recruitment level. There is an increased fishery pressure in this area due to displacements from the Irish Sea and the Western Channel. The first is due to the extreme low level of the Sole VIIa TAC, contrary to the fishermen's observations and the second due the year to year variation of abundance of target species in VIIe. The observed abundance in VIIg is another reason for fishermen to displace their activities to this area. Scientific analysis also indicates that the SSB of sole VIIg is above $B_{msytrigger}$. The advice of ICES and the Commission aims at also bringing the other criteria on MSY-level in 2015, whilst the new CFP only asks this 'where possible'. A gradual evolution to MSY-levels by 2020 partly taking into account the socio-economic aspects fits perfectly within the CFP requirements. A different but still correct interpretation of the scientific advice would thus allow retaining the 2014 TAC in 2015.

For **Sole VIId** the scientific models indicate low levels of recruitment established mainly based on one annual young fish survey. Adding data of two other annual beam trawl surveys and the catch data of commercial vessels the Commission management rules lead to a proposal of an extreme 60% TAC reduction. Again fishermen declare that this does not correspond at all with the abundance they observe on a daily basis. Members of EAPO have attended in a meeting with the Commission at which it was stipulated that contrary to adjacent areas there is no management plan for Sole VIId. This message was taken to the NWWAC where it was agreed to start working on a proposal for such specific long term management plan. On the shorter term, specifically for addressing the TAC 2015, the Belgian & French EAPO memberships with their respective national authorities are working on a proposal for imminent technical measures aiming to avoid young sole. EAPO finds that the Commission's proposal disallows the fishermen to demonstrate their ability to manage their fisheries based on their own professional assessment of the stock status. Assisting this with the above mentioned work on short and long term management measures should allow a more realistic approach to the Sole VIId TAC 2015 and even a continuation of the 2014 situation.

The **Sole VIIIab** stock was subject to a proposal for a management plan as prepared by the French industry in 2013. Whilst this has not been adopted as is, as the proposal for a fixed TAC of 4100 tonnes has been reduced to 3800 tonnes, there was no contestation of the plan. Yet the TAC stability in situations where the fishing mortality does not increase, has implicitly been accepted. Less than a year after partly validating a proposed management plan the Commission puts forward a 10% TAC reduction, whilst the fishing opportunities are already very tight. Keeping the TAC at 3800 tonnes maintains the possibility to reach F_{msy} by 2017.

While the Commission has not as yet made any formal proposal for the TAC for **Nephrops VII** indications are they will, once again, make a proposal based on ICES landings advice. The ICES advice for this stock does recommend a 3% increase in landings based on the cumulative advice for the stock, however due to the fact that there are differential up-take levels between the Member States who have a share in the TAC,

this landings recommendation is significantly lower than the 2014 TAC for this species. It is therefore EAPO's view that the 2015 TAC should be 3% higher than the 2014 on the basis of the scientific advice. It should be noted that despite the TAC being set higher than the recommended ICES landings advice in recent years, actual landings have been considerably lower than those recommended by ICES. In relation to the Porcupine Bank "of which" restriction it is noted that both ICES and the Commission have acknowledged that both this and the seasonal closure are not required. Therefore in line with the mechanism put forward by EAPO in 2012 and 2013 we would recommend that the "of which" restriction should be removed (or "switched off") for 2015.

3. Prohibited Species

The Commission proposes to expand the list of species for which fishery, retaining on board, transshipment and landing is prohibited by adding the **tope shark** (*Galerhinus Galeus*). Up till now this species was not subject to a prohibition for direct long lining fishery. Whilst ICES is not asking this prohibition it seems to originate from the legal difficulty to maintain a specific prohibition for long liners. It has to be noted that the proportion of long liners in the fishery fleet operating in the tope shark habitat is less than 10%. Accordingly in order to maintain a prohibition for a minority metier the Commission finds that this should be imposed upon a large majority of the fishery fleet. This proposal should be rejected and landing should be permitted for all vessels.

Recommendations on Demersal Stocks North Sea.

For **North Sea Sole** and North Sea Plaice in week 47 ICES has published revised catch advices 2015. For both species the stock size has increased. The Spawning Stock Biomass (SSB) 2016 for North Sea Sole will come out over 55,000 tonnes (Safe Biological Minimum: 35,000 tonnes) and for North Sea Plaice above 750,000 tons (Safe Biological Minimum: 230.000 tonnes), again an all-time record. The ICES-advice for Sole in June showed a reduction in the TAC from 11,900 tonnes this year to 10,973 tonnes in 2015, a decrease of 8%. The new advice proposed for 2015 a TAC of 11,365 tonnes, that means still a reduction of 4.5% compared to this year. Fishing mortality (F) on Sole is historically low. EAPO advises for Sole a rollover, the stock then still increases by more than 20%. With a roll-over the stock becomes very sustainably managed with the lowest F in the long-term history.

In the advice of **North Sea Plaice**, we find out that the positive state of the assessment does not affect the TAC-advice because it already shows an increase of 15%, the maximum as defined in the Sole/Plaice management plan. This now brings it to the bizarre situation that catch advice including discards increases from 179,000 to 186,000 tons, 7000 tons more, but the TAC-advice remains unchanged at 128,375 tons, which means it will only increase the discards with 7000 tons. We understand that there are management rules, but that this can lead to such perverse outcomes should be assessed as negative. In future legislation this should be taken into account and a solution should be found.

For the information limited stocks **Skates & Rays** and **Dab / Flounder** the proposal is a cut of 20 %. This is certainly the 5th or 6th year in a row the case. However, during the last meeting of the NWWAC we were informed by a representative of ICES that for science the cut for a maximum period of 3 years is sufficient and definitely is not needed year by year. We urgently ask the European Commission and the Council of Ministers to stop the proposed reductions.

Given the fact that **North Sea Haddock** is fished sustainably and mortality rates are within parameters EAPO feels that an increase based around the MSY level is justified. This is

particularly appropriate in the lead up to a landings obligation as scientists are suggesting good recruitment.

Although management plans suggest a cut in the TAC **North Sea Cod** is recovering especially in many grounds that are fished by EAPO members' vessels. ICES have suggested a range of MSY that would mitigate the strict reductions required by the management plan. This approach would allow the vessels to enact the fishery in a sustainable fashion. Many mortality mitigation measures have been adopted in important Cod fishery fleets from Fully Documented Fishery to spatial closures. There is however a problem when a recovering stock outstrips the mitigation measures. In this instance this leads to increasing discarding. The TAC has to be set at a level that reflects this. EAPO takes note that a 20 % increase in TAC for cod will bring the fishing mortality well within ICES' proposed range of MSY mortalities. It will contribute to the further rebuilding of the stock by allowing SSB to increase with almost 20 %. It will also allow for more of the cod already caught to be landed, thus contributing to the CFP objective of reducing discards.

Although there is a proposed cut for **North Sea Whiting** that is unhelpful many of the recent selectivity measures have meant a severe drop in the landings of this species. However EAPO feels that the stock is at a far better level than is reflected in the science due to this selectivity and this stock is in a healthier state than proposed.

The proposal through the management plan for a severe cut in **Saithe** TAC will cause great difficulty for the vessels of the EAPO membership. The management principles lead to this being a choke species where catches far outstrip available allocation.

Pelagic Species

For the pelagic stocks we refer to the EAPO Northern Pelagic Working Group (NPWG) position paper of 8 October 2014 (see Annex I). The main conclusions of this paper were:

Blue Whiting

Regarding the Blue Whiting stock five issues play a key role:

1. Decision on an adequate Long Term Management Plan (LTMP)
The industry reiterates its strong interest in managing this stock on the basis of an adequate LTMP, as the recent history demonstrates that the TAC setting for this stock has shown a huge and unnecessary volatility.
2. TAC setting for 2015
The NPWG has the view that the TAC in 2015 should be set in accordance with F_{msy} or 1,326,035 tonnes.
3. Sharing arrangement
The 2005 sharing arrangement for Blue Whiting must be adapted in favour of the EU.
4. Access for Norway
EAPO requests the Commission to ensure that Norway pays for any renewal of an access arrangement to fish Blue Whiting in Community waters. The payment by Norway - in whatever form - should accrue to the benefit of the Community pelagic fleet.
5. Role Blue Whiting in the exchange of quota between EU and Norway
(See EU-Norway bilateral input below)

Mackerel

EAPO wants to follow the PELAC to:

- follow the MSY approach in the 2015 TAC setting for this stock amounting to a 2015 TAC of 1,017,000 tonnes,
- consequently follow the new management plan in 2016 when ICES considers this to be precautionary. If this would not be the case then follow MSY approach again in 2016.

Atlanto Scandian herring

EAPO wants to:

- follow the recommendation do the PELAC to set the 2015 TAC for this stock in conformity with the management plan at 283,014 tonnes,
- express deepest concern about the setting of unilateral quota by Faroe Islands,
- state very clearly that it is NOT prepared to pay for any share increase for Faroe Islands or any other Coastal State.

EU-Norway bilateral

NS Herring: EAPO recommends to follow the PELAC advice which gives a TAC in 2015 of 445,329 tonnes for the A fleet.

Balance of exchange of fishing opportunities: It is important to retain the EU share of the blue whiting stock for utilization by the pelagic fleet. In addition to this, EAPO is of the opinion that any transfers of blue whiting from the EU to Norway and/or Faroe should be deducted pro rata from the EU northern and southern blue whiting management area TACs.

Access EU vessels to fish Western Mackerel in EU waters of IIa: EAPO requests the Commission to address the anomaly rights between Norway and EU waters for the Western Mackerel fisheries in IIa.

EU-Faroeer bilateral

EAPO urges the Commission to negotiate the mackerel access quota for the Faroe Islands significantly downwards to traditional levels as per previous agreements.

(EAPO – 9 December 2014)

Annex I



European Association of Fish Producers Organisations (EAPO) Northern Pelagic Working Group – (NPWG)

8 October 2014

NPWG position paper regarding CS negotiations and bilateral agreements for 2015

Blue whiting

Regarding the blue whiting stock 5 issues play a key role:

1. *Decision on an adequate Long Term Management Plan (LTMP)*

Through the Pelagic AC (PELAC) the pelagic industry organized under the NPWG has invested over the past few years a tremendous amount of time and effort in developing, together with scientists, an adequate LTMP for this stock. Eventually NEAFC has included this draft LTMP in their request to ICES on the management of this stock. ICES has reviewed this plan and found it to be precautionary.. NPWG therefore suggests that the EU takes a pivotal role in promoting this plan with the Coastal States. The industry reiterates its strong interest in managing this stock on the basis of an adequate LTMP, as the recent history has shown that the TAC setting for this stock has shown a huge and unnecessary volatility.

2. *TAC setting for 2015*

Because of the fact that no new LTMP has been adopted by the Coastal States , ICES according to its rules gives advice on any agreed management plan even if that plan is no longer fit for purpose. In this case the plan used dates back to 2008 and does not take into account the new revised fishing mortalities rates advised by ICES last October even if that plan is no longer fit for purpose. Everybody agrees that this plan is obsolete in many ways but still ICES bases its advice on this 2008 plan because, as we are told, no CS has formally objected against this obsolete plan. This anomaly creates a fair amount of confusion among stakeholders, the more so while ICES in 2013 has twice advised that the target F of the 2008 plan has to be revised. The target F of the 2008 plan was set at F0.1 and F0.1 has been revised upwards from 0.18 to 0.22. In the same evaluation ICES has also indicated twice that Fmsy for this stock is to be set at 0.30. In both the 2013 and 2014 advice ICES states that Fmsy of 0.30 is a robust value.

In the view of the NPWG the TAC in 2015 should be set in accordance with Fmsy or 1,326,035 tonnes.

3. *Sharing arrangement*

The joint management and with it a sharing arrangement of this stock developed only recently (2005) and only after 3 of the 4 Coastal States (Norway, Iceland and Faroe Islands) had allowed free, unregulated, fisheries on this stock for a number of years with the sole aim to build up track records to be used in future allocation negotiations. Which is why the 2005 sharing arrangement among the 4 Coastal States ended up as follows:

- EU 30,50%,
- Faroe Islands 26,12%,
- Iceland 17,63%
- Norway 25,75%.

This has to be seen against the background that only 5 years earlier the EU was responsible for roughly 60% of all blue whiting catches. During the 5 years prior to 2005 the EU fleet has been forced by the EC and Council to limit her fisheries by setting limited autonomous TACs, while at the same time the other 3 Coastal States allowed their fishermen a free-for-all fishery on this stock when the blue whiting stock was at its peak of abundance and distribution area.

Post 2005 the stock reduced in size and contracted to the core area of spawning and feeding, i.e. the EU waters west of Ireland. As a consequence the pelagic fleets of Norway and Iceland were not able to catch their shares in the joint TAC in their own waters and became highly dependent on access arrangements between on the one hand Iceland and Faroe Islands and on the other hand Norway and the EU. Unfortunately the EU in 2005 gave away for free – and entirely against the advice of the fishing EU industry – access in EU waters to the Norwegian fleet up to almost 70% of the Norwegian blue whiting quota.

This situation has continued until today and the NPWG feels very strongly that the time has now come to repair this totally unjust situation. The 2005 sharing arrangement for blue whiting must be adapted in favour of the EU.

There are two arguments that leverage the position of the EU in this:

- a. The NEAFC report that was requested by the blue whiting Coastal States (*Information on the Distribution of All Life Stages of Blue Whiting in the North-East Atlantic and the Distribution of Catches from the Stock, London, 26 – 28 November 2013*) clearly shows that the blue whiting catches in Icelandic and Norwegian waters have been reduced to almost non-existent levels since the current sharing arrangement came into being from 2006 and that the spawning of this stock continues to occur predominantly in EU waters. As the report is requested by NEAFC no conclusions are drawn on the revision of the sharing of course, but a lot of quite interesting material is included.

One example of this of the relative distribution of the blue whiting catches in the various areas (CS EEZ's and international waters) over the past 35 years (1977-2012). It is clear from this picture that the main catch areas are (in order of magnitude): EU EEZ, Faroese EEZ, international waters West of Ireland, special area between EU/Faroe, international waters Norwegian Sea, Norwegian EEZ and Icelandic EEZ.

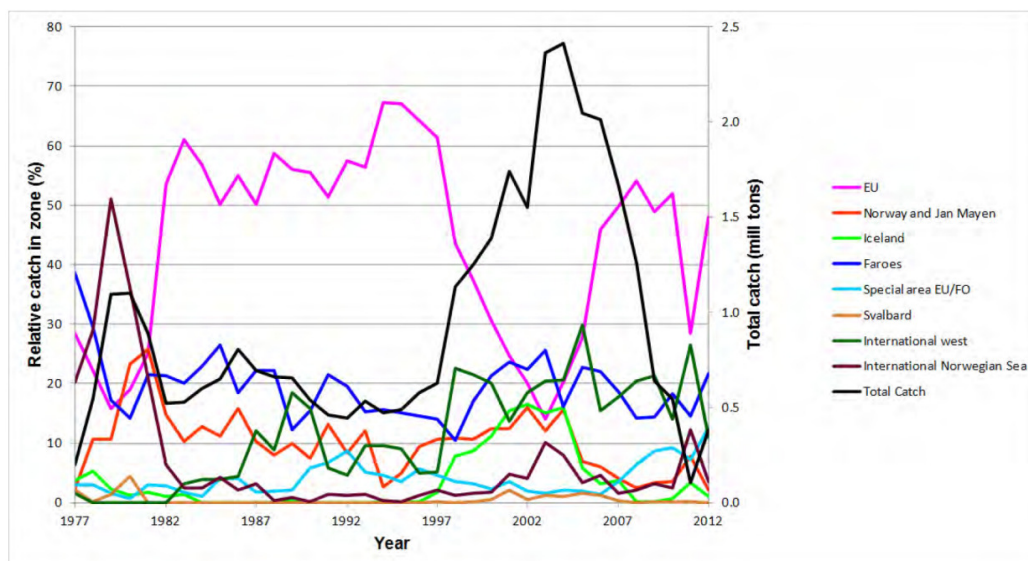


Figure 3.6.3. Relative distribution of catch by zone (left axis) and total catch (right axis) in the period 1977-2012

A second example is shown in table 3.6.4 of the document where the average per area catch is given for the period 2006-2012. If one puts these percentages next to the current sharing arrangement one sees a striking non-resemblance.

Coastal state	Current share (in %)	2006-2012 catches in CS EEZ's (in %)	Difference (in %)
EU	30.50	46.70	- 16.20
Faroe Islands	26.12	17.70	+ 8.42
Iceland	17.63	1.70	+ 15.93
Norway	25.75	4.20	+ 21.55

It is very clear from these two examples from the NEAFC report that EU is the big loser from the current blue whiting sharing arrangement and the other 3 CS , in particular Norway and Iceland, are the big winners.

In this context it has to be reminded that the share of catches in the EU EEZ would have been much higher when the share of the EU would have been higher from 2006 onwards. The background of this is that only the EU fleet is able to catch its blue whiting quota entirely in its own waters.

- b. The Coastal States agreement for blue whiting for this year – including the quota sharing arrangement – has been agreed to be an ad hoc arrangement for only 2014.

4. Access for Norway

The EC in 2005 gave away for free – and entirely against the advice of the fishing EU industry – access in EU waters to the Norwegian fleet up to almost 70% of the Norwegian blue whiting quota. Unfortunately this gift by the EC was supported by the member states.

This bilateral blue whiting access arrangement between EU and Norway was however a temporary arrangement up for revision not later than 2008. Since then this access arrangement has been prolonged silently but under protest of the NPWG.

It is really about time to seriously take up this revision clause this year.

Whatever access into EU waters the Norwegian blue whiting fishery will be granted it should never be

for free as has been the case until now. Access is a worthwhile commodity which should be treated as such in any negotiation.

NPWG requests the Commission to ensure that Norway pays for any renewal of an access arrangement to fish blue whiting in Community waters. The payment by Norway - in whatever form - should accrue to the benefit of the Community pelagic fleet.

5. *Role blue whiting in the exchange of quota between EU and Norway*
See below under EU-Norway bilateral.

Mackerel

In March this year EU, Norway and Faroe Islands reached a 5-year agreement on the joint management and sharing of the NEA mackerel stock. This was done against the background of a changed perception of ICES of the abundance of this stock after that the entire industry had repeatedly claimed the same and after that an existing coastal state (Faroe), new coastal states (Iceland and Greenland) and Russia had thoroughly stepped up their mackerel catches over the years until an unprecedented (recorded) catch level of over 1.4 mln tonnes. NPWG has deplored the negotiation process conducted by the EC as well as the outcome of the March agreement. NPWG has furthermore expressed its disappointment that in particular Iceland has been able to walk out of the negotiations at the very last moment for reasons that show once more the cynical approach by the Icelandic government regarding the mackerel negotiations. It is generally known that Icelandic companies also in 2014 are heavily involved in the Greenlandic mackerel fisheries. This Greenlandic mackerel fishery is another example of an olympic fishery which is only bound by the ability to catch mackerel and not – as it should be – by the limits set by precautionary management decisions.

Furthermore we have duly noted that Iceland has in her 2014 autonomous TAC setting deviated from the 2014 quota reservation made by the three CS in March this year. While we hoped that Iceland would adhere to this sharing agreement, albeit in an informal way, the reality turned out to be different when Iceland issued higher quota to its ship-owners than it would according to this quota reservation by the three CS. This is disappointing and leaves hardly any hope that a more fully fledged CS sharing agreement will be reached this autumn that also includes Iceland.

When in March the three CS decided to agree on the basis of a 2014 TAC that was way beyond the TAC advised by ICES (1,24 mln tonnes against an advice of 0.9 mln tonnes) the industry knew one year later the industry had to pay the price for this high TAC. The latest ICES advice indeed confirms this concern as the advice states a 2015 TAC of 906,000 t maximum.

NPWG wants to follow the recommendation agreed upon in the PELAC on 3 October this year in which the PELAC basically wants to:

- follow the MSY approach in the 2015 TAC setting for this stock amounting to a 2015 TAC of 1,017,000 tonnes,
- consequently follow the new management plan in 2016 when ICES considers this to be precautionary. If this would not be the case then follow MSY approach again in 2016.

Atlanto Scandian herring

NPWG deplores the fact that one coastal state (Faroe) has left the agreement in 2012 and has decided to set its own autonomous TAC for this stock in 2013 and 2014, while at the same time the management plan for this stock led to a range of severe reductions for this fishery. Even so disappointing was the decision by the EC to propose the lifting of the sanction against Faroe Islands (by August 2014) in a situation that Faroe Islands did not reduce its autonomous quota to previous (Coastal States) levels but to retain an autonomous share double its former share. NPWG does not understand how the EC (and supporting MS) can possibly defend such behaviour. In the end if Faroe Islands wants to re-join the coastal states agreement for this stock, which of course will be discussed during the CS negotiations, somebody is expected to pick up the bill for Faroese higher

share.

NPWG wants to state very clearly that the EU industry is not to pay for an increase in the share of Faroe Islands. In short NPWG wants to:

- follow the recommendation do the PELAC to set the 2015 TAC for this stock in conformity with the management plan at 283,014 tonnes,
- express deepest concern about the setting of unilateral quota by Faroe Islands,
- state very clearly that it is NOT prepared to pay for any share increase for Faroe Islands or any other Coastal State.

EU-Norway bilateral

- NS Herring

According to the ICES evaluation of the existing management plan for NS herring the plan has proved to be precautionary but to not deliver maximum yields. This is why Norway and EU have entered already some time ago into the development of a revised management plan for this stock. The necessary scientific work for this revision has been taken place and EU and Norway have already in September 2013 agreed about the outline of the revised plan (target F, reference points, Btrigger, stability mechanism). Since then ICES was not in the situation to evaluate this revised plan. This all is very disappointing for the industry which requires an adequate and functioning management regime for this important stock.

It is therefore reassuring that the PELAC last week has decided to recommend to base the setting of the 2015 TAC for this stock on the new management plan.

NPWG advised to follow this PELAC advice which gives a TAC in 2015 of 445,329 tonnes for the A fleet.

- Balance of exchange of fishing opportunities

NPWG does not support the cross-sectoral subsidizing of fisheries and the transfer of blue whiting or any other pelagic species to Norway in 2015.

It is to be understood that the directed blue whiting fishery by EU vessels is done with the purpose of human consumption. Hardly any blue whiting is being caught for fish meal production. This almost 100% switch to human consumption fishery of blue whiting has taken place in only a few years and is irreversible. Norway on the other hand is still fishing part of its blue whiting quota for industrial purposes.

Overall fishing opportunities will decrease in 2015 for the EU pelagic fleet. It is therefore important to retain the EU share of the blue whiting stock for utilization by the pelagic fleet.

In addition to this, NPWG is of the opinion that any transfers of blue whiting from the Community to Norway and/or Faroe should be deducted *pro rata* from the EU northern and southern blue whiting management area TACs.

- Access EU vessels to fish western mackerel in EU waters of IIa

Only recently it became clear in the vast complexities of EU legislation a situation has arisen that when EU vessels are fishing for western mackerel (MAC/2cx14) in area IIa, it was only allowed to catch MAC/2cx14 in the Norwegian waters of area IIa and not in the Community waters of IIa. This strange situation seems to be a technical oversight which only now comes to surface.

NPWG therefore requests the EC to address this anomaly and to rectify it. NPWG does think that this

rectification can be done autonomously by the EU in her own legislation.

EU-Faroe bilateral

NPWG is deeply unhappy with the level of mackerel access quota granted to Faroe Islands, 46,850 tonnes. The rationale behind Faroe Islands receiving a larger mackerel share was based on their zonal attachment argument. There is, therefore, no coherent case for agreeing an access tonnage of this magnitude. NPWG urges the Commission to negotiate the access tonnage significantly downwards to traditional levels as per previous agreements.

NPWG

8 October 2014