

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 2016 TAC and Quota Proposals

A/ Introduction

The Commission Proposal COM (2015) 559 published on the 10th of November 2015 contains the proposals to the Council in relation to the setting of fishing opportunities for the majority of demersal and some pelagic stocks for 2016. This is the first TAC proposal affecting demersal stocks subject to the Landing Obligation, which results in the fact that even more items than other years are noted as 'pm – pro memorie'. EAPO is disappointed that no proposals for the necessary quota uplifts were included.

B/ General Observations

Since the issuance of the ICES scientific advice based on a procedure agreed with the European Commission, it was clear to EAPO that for quite a lot of important stocks there would be substantial difficulties. This has been the case for a number of years but appears to have worsened since the introduction of the new CFP with the narrow interpretation of its objectives and how to reach them. While there is a commitment given in the CFP to attaining MSY by 2015 this includes the caveat "where possible" which allows certain species a longer time period (with 2020 as the latest possible date) to achieve MSY. In fact article 2.2 second paragraph of 1380/2013 states as shown below in bold that after 2015 it shall be on a progressive, incremental basis at the latest by 2020 for all stocks. Once MSY has not been achieved by 2015 according to the legal text the progressive, incremental basis applies. It is therefore unfortunate that ICES were not requested by the Commission in accordance with article 2.2 second paragraph of 1380/2013 to provide advice on adopting an incremental approach to achieving MSY.

"In order to reach the objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield, the maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and, on a progressive, incremental basis at the latest by 2020 for all stocks."

As such the Commission's proposal is mainly a reduction of catch opportunities with some increases, despite the admittance the state of the stocks in the North East Atlantic is generally improving. For EAPO this demonstrates that there is hardly any consideration for the socio-economic objectives in the CFP. Accordingly the task to take into account all aspects for determining the fishing opportunities 2016 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. ICES appears to be constantly changing the assessment models, which leads to an excessive amount of adaptations of the appreciation of the state of the stocks. These changes are no improvements by definition, but EAPO's feeling of constant 'shifting goalposts' is fed by the resulting advices. Despite all this, the upward trend of all stocks and the decrease of fishing mortality remains unchanged. These very positive developments must be stressed. The recommendations below are aiming to assist the Council in addressing these issues.

C/ Demersal Stocks

1. Bass

EAPO acknowledges that bass requires Action but not Overreaction. We would make four points for consideration by fisheries ministers when moving towards critically important decisions at the December Council:

- The emerging scientific advice on bass indicates that successive below-average year classes and an overall fishing mortality that is too high, requires remedial action.
- Landings statistics make plain that a very large number of fishermen using a range of gears depend on bass for a significant part of their annual income.
- The history of the CFP is littered with examples where clumsy measures have made things worse rather than better.
- The Commission's proposal, which amounts in effect to a moratorium on bass, is driven by the legally binding but wholly arbitrary requirement to reach MSY by 2016 or 2020 at the latest.

Against this background we consider that it is important that the fisheries ministers take a measured and proportionate position at the December Council. A moratorium would have devastating social and economic consequences. The science on bass gives cause for concern; it does not justify overreaction. Catch limits, an increased minimum conservation reference size and bag limits have been in place for under a year.

EAPO urges ministers to:

- Reject the Commission's proposal.
- Support proportionate step-wise measures.
- Ask for assessment of the efficacy of the measures that have already been put in place and adjust policy accordingly.
- Recognise the multi-faceted dimension of the bass fishery.
- Be aware of the potential for unintended consequences.

As an example of the latter point in relation to North Sea cod, ministers' actions have resulted in a dramatic increase in discards, which can only have impeded recovery. A more intelligent and effective approach only emerged later. We think that this is an important lesson. The science on bass is patchy but should not be ignored. Overreaction and unintended consequences are at least as dangerous in these circumstances as inertia. Effective measures require, not eye catching legislation made in the media spotlight but measures which can be effectively implemented and achieve their objective.

All this suggests that the Commission's proposal should be rejected. But equally important is that an effort is made through the formal science but also through dialogue with the fishermen who rely on bass for their livelihoods and therefore have a greater interest than anybody in restoring healthy stocks, as to what measures would work and not work in their fleet sector. Because of the complexity of the bass fishery it is metier specific measures that are required and the old discredited blanket knee-jerk carries a risk of making things worse.

2. Cod

a/ Cod VIa

ICES continues to advise that there should be no directed fisheries for cod in VIa and the commission in its proposal for the fishing of fishing opportunities for 2016 notes that discards rates are still above 70%, although much of these can be put down to the 1.5% by-catch limit currently in place. Despite several years of a management plan, there is no discernible recovery in the stock, and some scientists (e.g. *Grey seal predation impairs recovery of an over-exploited fish stock* - Cook - 2015 - Journal of Applied Ecology - Wiley Online Library) are now suggesting that levels of seal predation within the area are now preventing any recovery from taking place.

As we approach the Discard Ban this situation cannot continue or fisheries will very quickly choke on this species, there is unlikely to be a significant recovery before it has to be introduced, therefore if we are to protect fisheries for other more commercially important fisheries in this area, we must now look for alternative solutions. Work has begun within industry looking at avoidance, spatial and temporal solutions and surveys conducted in 2014 show a slightly improving picture in the Northern part of the area. To allow sufficient time to prepare for its introduction into the landing obligation EAPO recommends that the commission begin to look at alternative ways to manage this stock.

b/ Cod VIIe-k (Celtic Sea)

The ICES advice for cod VIIe-k is for landings of 3569 tonnes which represents a reduction in the overall TAC of approximately 30%. This reduction is in main due to a new value for F_{msy} being set for this stock and advice being for an F below F_{msy} on the basis that the stock size for 2016 is below the present value for $MSY B_{trigger}$. It should however be noted that in its advice ICES also acknowledges that the stock size is expected to increase in 2017 at or below current fishing rates due to the strong 2013 year class reaching maturity.

In addition due to the revised MSY value it would appear now that cod VIIe-k has in fact never been fished at F_{msy} and therefore our comments in relation to the timelines and phasing for achieving F_{msy} as set out above under General Observations are applicable for this stock. EAPO therefore is of the view that for this stock ICES should be requested to provide landings advice on the basis of achieving MSY on a stepped basis by 2020.

3. Haddock VIIb-k

The ICES advice for haddock in VIIb-k based on the MSY approach is for landings of no more than 6078 tonnes which represents a reduction of 27% on the 2015 quota. On closer examination of the ICES advice it becomes apparent that this stock is in a healthy state with an SSB considerably above any of the trigger points. Selectivity measures are in place since 2014 and will be expanded with the upcoming landing obligation requirements. A subsequent reduction of the discards should result in an equivalent TAC increase.

Furthermore EAPO notes that the value of F_{msy} for targeted species does not take into account the changes in the exploitation pattern due to the higher selectivity objective. Taking all the above into account EAPO is of the view that also this stock is amongst the ones for which ICES should be requested to provide landings advice on the basis of achieving MSY on a stepped basis by 2020.

4. Hake

In view of the fact that the data for northern hake have improved in 2015 and the downward trend of fishing mortality after 2014, EAPO recommends to continue applying the management criteria as for 2014 by establishing a landing quota of 111.922 tonnes and a TAC (including discards) of 126.908 tonnes. This means in both cases 15.8% above the ICES advise, as it happened in 2014.

5. Megrin

In line with what the Council of fisheries ministers has been establishing for the last years and taking into account that the stock assessment shows a robust improvement, EAPO considers that a moderate 30% increase (slightly below the figure for the biomass increase) equal to an amount of landing opportunities of 24,831 t in 2016 would be a plausible decision for northern megrim.

6. Monkfish

Taking into account that the stock abundance has increased, a combined TAC of 48133 tonnes is proposed. This proposal is in line with the decisions taken by the EU Council over the last years and the data improvement shown in 2014.

7. Nephrops

a/ Nephrops VII

While it is noted that in the Commission's proposal a "pm" figure has been included for the various nephrops stocks EAPO would like to make two points in relation to nephrops in area VII:

- The TAC for nephrops VII has traditionally been set significantly higher than the catch figures included in the ICES advice but actual landings have been significantly lower due to the differential level of uptake by the various member states, some utilising all of their quota allocation and others leaving a significant portion of their quota uncaught. Based on this assessment and in line with ICES advice EAPO recommends a roll-over of the TACs from 2015 to 2016.
- With reference to the Porcupine Bank 'Of Which Restriction' EAPO notes that while the Commission has not as yet made its proposal regarding the 2016 Nephrops quota, in its proposal document it appears that once again this restriction is anticipated in addition to the seasonal closure. In 2014 STECF evaluated both of these measures and came to the conclusion that at that time only one of these measures i.e. either the closed area or the 'Of Which' Restriction' was required. From an EAPO perspective the closed area appears to

be a far more effective conservation tool and therefore in 2014 EAPO members brought this forward in the NWWAC which led to a NWWAC proposal for a mechanism to switch on and off the 'Of Which Restriction'. If followed this would have led to the 'Of Which Restriction' removed for 2015. The 2016 ICES advice for the Porcupine Bank nephrops sets out the stock remains in a stable condition and therefore it would appear that switching off the 'Of Which Restriction' for 2016 is justified.

b/ Nephrops Villabde

The ICES advice for 2016 is the same as last year's noting positive evolutions for the nephrops stock in the Bay of Biscay. The biomass is increasing and is at its historical highest. Fisheries effort is progressively decreasing. A video survey determining the stock abundance is planned to safeguard the scientific knowledge and an ICES benchmark workshop is planned in 2016. Based on all this the TAC 2016 should be maintained at the 2015 level.

8. Plaice North Sea

The stock of North Sea plaice continues to increase and is once again the highest on record. Following the management plan would give a 15% TAC increase. As second option ICES indicates an F_{msy} which would result in a 22% TAC decrease. Since 2008 the management plan gives very good results. Friday December 4th EU and Norway concluded on a bilateral agreement for 2016 with for North Sea plaice a disappointing outcome. For the TAC based on landings there is a rollover and there is only a small uplift of 2,6 % to accommodate the Landing obligation. EAPO considers it a wrong signal to ignore the rules of the following phase II of the Management plan. In our opinion following the ICES-advice on the basis of this plan is more consistent.

9. Pollock VII

This stock for ICES has a classification as a 'Data Limited Stock'. A difficulty exists in relation to this stock however as while it is an extremely valuable fishery to those smaller, inshore vessels who rely on it, its overall economic value would render it difficult, if not impossible to justify the spending required to elevate its categorisation to Category 1 on the ICES classification.

Nonetheless if the ICES advice in relation to this stock is examined in further detail it sets out that commercial catches have been stable for over two decades and recommends the same landings figure for 2016 that it has recommended since 2012. It is therefore disappointing to note that in its proposal the Commission has, yet again, included a 20% reduction for this stock, despite it being from an ICES perspective "Same Advice as Last Year" since 2012.

10. Skates & Rays

For the past number of years the EAPO has been highlighting the situation regarding the stocks categorised as 'Data Limited Stocks' including skates & rays. There have been considerable efforts expended both nationally and at an EU level to improve the available data with the result that in its most recent advice for skates & rays published in 2014, ICES stated that in 2013 over 93% of skate landings were reported on an individual species level.

Notwithstanding the above the Commission has proposed a 20% reduction in the TAC for skates & rays for 2016. For the past number of years there have consistent year on year TAC reductions applied to these stocks on the basis of their data limited classification and despite the fact that overall the stock (which is in fact comprised of a number of sub species) would appear to be in a stable state. If the Commission's proposed quota for 2016 is implemented this would mean that the TAC for this stock has decreased by over 45% since 2011.

In most areas the majority of the catch is composed by two species, thornback ray (*raja clavata*) and spotted ray (*raja montagui*), for which abundances, estimated through scientific survey, are known to have been increasing significantly and for which scientific advice is an increased TAC. Furthermore, in 2014, after a request by the Netherlands based on EU regulation 847/96, it was agreed to adapt the TAC in the North Sea by 10%. A similar request from France and the UK is currently being examined for the TAC in VIIId.

This is not consistent with the Commission's proposals to cut both TAC by 20% for 2016. A simple sum of the maximum catches recommended by ICES for 2016/2017 for each stock gives a 30% increase of the global TAC in the areas IIIa, IIa, IV and VIIId. This again makes the Commission's proposals very hard to understand. It is clear that increasing the skates & rays TACs would be the only way to be consistent with both the scientific advices and fishermen's observations.

For that purpose last year in France a proposal was prepared for a new way to calculate the global skates and rays TAC in order to take into account the proportion of each species in the catches and the specific advices associated with each species. When evaluating this proposal STECF had some concerns in respect of the impact this might have on the most vulnerable species. EAPO considers that some of them are already protected by the landing prohibition and that safeguards can be introduced in collaboration with the fishing industry for the others. For example it would be possible to limit the landings of the most vulnerable species to a certain percentage of the global TAC and to set a minimum landing size according to scientific advice.

Using this method for 2015 the TACs for areas VI, VIIa-c,e-k and VIII, IX were the same as in 2014. Since the scientific advice is given for both 2015 and 2016 and no new elements on those stocks have arisen, there should be as well a rollover for 2016. For the Eastern Channel and the North Sea considering above, a significant increase seems to be possible for the TAC in both areas. EAPO recommends a closer look at the methodology proposed by France last year. Some EAPO members also find a closer look at closing nursery grounds in some areas useful

11. Sole

a/ Sole IIa,IV

As regards North Sea sole, the ICES models show that a 10% increase of the TAC is equally justified as the roll-over that is proposed. Additional scientific information learns that the SSB continues to increase in the coming years and that including this 10% increase the F_{msy} level will be met well before 2020. In view of the socio-economic situation in this fishery EAPO therefore strongly advocates this 10% increase.

b/ Sole VIIa

A fisheries-science partnership wishes to continue its work to find an explanation for the differences between the scientific assessment for this stock and the fishermen's

experience of abundance. A zero TAC as proposed by the Commission to the Council would endanger the continuation of this useful exercise. This would also mean that sole would be excluded from the ICES ecosystem approach benchmarking for the Irish Sea that has started.

Furthermore setting a zero TAC would result in sole discarding in the mixed demersal fishery in the Irish Sea. A technical measure for beam trawl fisheries, tested in VIId and positively evaluated by STECF as leading to avoidance of undersized sole, is nationally mandatory in the Irish Sea for Belgian beam trawlers. Taking the above into account and the fact that the ICES assessment for 2016 establishes this would not result in a negative evolution of the stock criteria, EAPO recommends to keep the TAC of sole VIIa at the same level as in 2015.

c/ Sole VIId

Reference is made to a NWWAC advice of June and the supplement advice of October 2015, proposing to set a fixed TAC as good as guaranteeing the achievement of F_{msy} in 2020. A further STECF evaluation of the measures proposed in this advice for a management strategy for sole VIId has been published on 27 November. The NWWAC prepares a more specific advice based on the recent STECF evaluation. EAPO considers that the management strategy proposed by the NWWAC is an efficient roadmap to reach the CFP objectives and recommends to set the TAC 2016 according to this advice (3000 tonnes + landing obligation uplift).

d/ Sole VIIfg

For sole VIIfg the recruitment is at an OK level. Fishing mortality since 2011 has risen above F_{pa} but the spawning stock biomass remains above the MSY-objectives. A gradual evolution to F_{msy} instead of aiming for this target in 2016 would contribute to safeguarding a minimum level of economic sustainability for the sole fishery in this area. Combining the issues of sole VIIa and sole VIId, also in VIIfg according to fishermen there is an ample abundance of this stock and a management strategy aiming for F_{msy} in 2020 should be taken into consideration. EAPO recommends accordingly to set a fixed TAC as good as guaranteeing F_{msy} in 2020.

e/ Sole VIIIab

In 2013 the SWWAC has proposed harvest control rules for sole in the Bay of Biscay that have been evaluated by ICES. The application of a biomass safeguard measure mentioned in this proposal leads to a conclusion to set the TAC 2016 according to F_{msy} , meaning a 37% reduction in comparison with the TAC 2015. However, there remains a high uncertainty about the F_{msy} level used by ICES. Recent benchmarking results (WKMSYREF – ICES 2015) should be integrated in the models to adapt the conditions for a sustainable management. The maximum fishing mortality is at 0,46 whilst F_{msy} is currently set at 0,26.

Furthermore the AC proposal also contained a requirement to set additional measures to in order to apply a restriction of the TAC reduction to 10% (when fishing mortality increase two subsequent years). This should provide a level playing field between the different fleets targeting sole and take into account the relative impact on fishing mortality these fleets have. Such additional measures include periodic closures for vessels targeting sole and measures to increase selectivity.

12. Associated Species North Sea

The North Sea fisheries are mainly mixed fisheries. This leads, by definition, to a reduced knowledge on the state of stocks of many of the species of minor economic

importance. These non-target species are caught as inevitable by-catch in the process of the primary fishery, despite taking selectivity measures where possible. In this respect EAPO does not understand the yearly returning proposals by the commission for a TAC reduction of these associated species (turbot & brill, lemon sole & witch, dab & flounder).

D/ Pelagic Stocks

1. Blue Whiting

Blue whiting is jointly managed since 2005 by four coastal states (EU, Norway, Faroe Islands and Iceland). The allocation of the TAC for blue whiting between these coastal states in 2005 - at the initiative of the EU industry - came about after years of overfishing by Norway, Faroe Islands and Iceland. The EU therefore had to accept in 2005 a share of 30% in the TAC. Since then, the blue whiting almost completely disappeared from the waters of both Iceland and Norway and the stock concentrated itself for a very large part in EU waters (and in lesser degree in Faroe waters).

Only after a scientific study by North-East Atlantic Fisheries Commission (NEAFC) in 2013 confirmed this situation, the European Commission finally took the initiative to put on the agenda the need to review the sharing arrangement among the coastal states. All this resulted in the impossibility for 2015 to agree on a coastal states agreement to jointly manage and share the blue whiting stock. However, the coastal states agreed on a NEAFC-recommendation for the 2015 blue whiting TAC. It was therefore very disappointing that subsequently both Norway and Faeroe Islands decided to increase their share unilaterally by 35-40%. The EU nevertheless decided to stick for 2015 to its old share of 30% of the TAC recommended by NEAFC. This all to the frustration of the European pelagic industry, of course, that felt entirely by-passed for the umpteenth time by irresponsible behaviour of the other coastal states (see the analogy with mackerel).

The blue whiting negotiations that have taken place since October this year have yielded no result. At present, the EU and Norway have realized that they are bound to agree on a two-party agreement for blue whiting as well as for AS herring for 2016. There was hope and expectation that both countries last week would be able to have these bilateral negotiations of blue whiting in parallel with the general fisheries negotiations between the EU-Norway. That did not work out, unfortunately.

The December Council therefore will have to take a decision on both the level of the 2016 TAC for blue whiting as well as on the share that the EU allows itself of this TAC. In the absence of both a coastal states agreement and a two-party agreement with Norway on blue whiting, the setting of the EU-share in the blue whiting TAC for 2016 is of paramount importance, because it will largely determine our room to manoeuvre in upcoming blue whiting negotiations with Norway and later with the other coastal states.

The NEAFC report indicated that an increase of EU's share of the TAC up to almost 50% could very well be argued for. This is also the reason that some important blue whiting Member States are aiming at a share of 45% of the TAC. This position is fully supported by the European industry. We must take a strong position before meeting with the other coastal states, including Norway. A decision by the Council for a share of the TAC by at least 45% is such a strong position. The scientific evidence on the distribution and presence of the blue whiting stock in EU waters are there to underpin this position with arguments.

In addition to a decision on EU's share in the blue whiting TAC the Council also has to decide on what TAC for 2016 it bases the EU-share. There are reasons not to follow entirely the ICES advice for blue whiting for 2016. The stock is still very healthy and also the recruitment is very promising. Fishing mortality has been too high in the past year according to ICES, in particular by the behaviour of Norway and the Faroe Islands, which is also the main reason for the substantial reduction in the TAC advised by ICES. However, by deciding to follow the management plan, which has been developed already, the reduction of the TAC could be limited to 20% in applying the usual stabilising mechanism (maximum 20% inter-annual TAC changes when the stock is above B_{msy}-trigger). For the pelagic industry, however, in the current context the level of the share (at least 45%) is of a higher priority than the level of the TAC.

The position of EAPO regarding blue whiting, therefore, is in short as follows:

- a/ Setting a quota for the EU which is at least equal to 45% of the TAC.
- b/ Obviously, the level of TAC is very important and the industry prefers to follow the developed management plan and thereby reducing the TAC with max 20%.
- c/ Yet, under these circumstances, point a/ has a higher priority than point b/.

2. Atlanto Scandian Herring (AS Herring)

Negotiations on AS herring are usually done by five coastal states (EU, Norway, Faroes, Iceland and Russia). Because EU claimed a year ago to open the negotiations of the blue whiting sharing arrangement Norway linked immediately the AS herring sharing arrangement to the blue whiting with the announcement that Norway aimed at a higher share in the AS herring TAC. The result of no agreement on blue whiting therefore also meant no agreement on AS herring for 2015.

A consequence of this situation was that the usual access for the EU fleet to catch its AS herring in Norwegian waters was not granted for 2015. Which of course was directly in breach with the AS herring sharing agreement decided in 2007, when the EU accepted a reduction of its share by 25% to 'buy access' into Norwegian waters (a reduction in the share from 8.67% to 6.50%). Also for 2016 Norway again has linked the negotiations on blue whiting to those for AS herring.

On the AS herring two issues are of importance:

- In the absence of a coastal states agreement on AS herring, the Council has to establish a quota for 2016 based on a TAC. We agree to establish the TAC to the level advised by ICES. Because the negotiation on AS herring are still on-going, it is logical now to fix the quota set on the basis of our current share of 6,50% (i.e. share with access).

However, it should also be agreed in the Council (by Council & Commission declaration or otherwise) that in case no agreement will be reached with Norway on AS herring for 2016, the EU will immediately increase its share for 2016 of the TAC to 8.67%. Because no agreement would mean no access. No access means an EU-share of 8.67%.

- As indicated above, in 2015, there was no access into Norwegian waters for the AS herring fisheries by EU vessels. In addition, the Norwegians also prohibited access to Svalbard (disputed by the EU). The EU fleet therefore had to search for AS herring elsewhere and found some in the EU part of ICES area IIa. At that moment it became apparent that we could not catch our AS herring in that area because an obsolete provision of the Technical Measures regulation (Article 20a) dating from the mid-90s.

If the AS herring negotiations for 2016 would fail again, access for EU-vessels into Norwegian waters or Svalbard would be denied again. We therefore need access to the EU waters of area IIa. It would be furthermore inexcusable that we would not be allowed to catch our own herring in our own waters because of our own regulations. We therefore have to de-activate this obsolete provision in the Technical Measures regulation. This could be done by a provision in the 2016 TAC regulation.

3. Argentines

Silversmelt is a data-limited stock. This is why in recent years the European Commission, almost by default, proposed to the Council to reduce the TAC for silversmelt for precautionary reasons. For 2016, ICES has changed the TAC areas for silversmelt and also the advice methodology. However, silversmelt knows no full stock assessment by ICES. The reference values for SSB and F are unknown. This may be the reason why ICES advises a reduction ('precautionary buffer') and the Commission subsequently proposes – again – a reduction of 20% for the 2016 TAC.

Also this year the advice and the proposal of the EC seems to be rather arbitrary. Last year, the EC has proposed a reduction of 12% and the Council in the end decided for a roll-over of the TAC. EAPO therefore once again calls for a rollover of the silvermelt TAC from 2015 to 2016.

E/ Sandeel

Preliminary observations from the 2015 dredge surveys carried out in December indicate that the results are outside the lower bounds of historic observations. According to ICES procedures (ICES CM 2010/ACOM:57. 201 pp.) an in season real-time monitoring scheme should be applied in order to establish the final TAC.

EAPO advises to state the following in the preamble regarding sandeel:

“It is appropriate, following advice from the ICES, to maintain a specific system to manage sandeel in Union waters of ICES divisions IIa and IIIa and ICES subarea IV. Given that the ICES scientific advice is expected to become available only in February 2016, it is appropriate to set the TAC and quotas provisionally at zero until such advice is released. If the ICES advice is based on survey results outside bounds of historical observations in Subarea 1, an in season real-time monitoring scheme should be applied in order to establish the final TAC.”

(EAPO 9 December 2015)