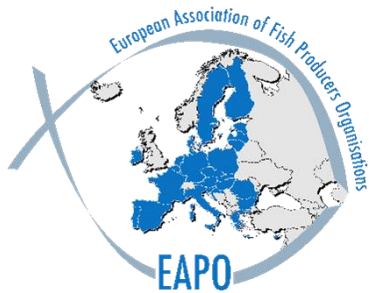


European Association of Fish Producers Organisations

Association Européenne des Organisations de Producteurs dans le secteur de la pêche



EAPO / AEOP

H. Baelskai 20 – 8400 OOSTENDE (Belgium)

Tel: +32 59 43 20 05

e-mail: info@eapo.com

website: www.eapo.com

Ms Charlina VITCHEVA

Director-General

Directorate-General for Maritime Affairs and Fisheries

European Commission

1049 BRUSSELS

Belgium

EAPO22-47

Oostende, 8 September 2022

Dear Ms. Vitcheva,

Subject: Request for a benchmark on Bay of Biscay sole

We would like to draw your attention to the situation of the Bay of Biscay sole stock, whose dynamics have been affected by a declining level of recruitment since the 1990s.

The trend's aggravation during the recent period is particularly worrying as sole is a major source of turnover for the Bay of Biscay vessels. The recent decrease in fishing opportunities, coupled with a severe drop of the 2022 TAC (-36%), have had dramatic impacts on the fishing fleet.

The ICES's June advice reaffirms the fall in recruitment, which in 2021 will have reached its lowest value since the beginning of the historical series (1984). This trend leads to a biased perception of the state of the stock, impacting decision-making on future fishing opportunities and slowing the implementation of the management plan.

As no revision procedure has been carried out since 2013 and as recruitment continues to decrease, it is essential for a benchmark procedure to be initiated by ICES. In the end, this much needed benchmark will improve both our understanding of the recent trends and the visibility the industry needs to plan ahead.

The following elements need to be considered by ICES in their soon to be benchmark:

- The latest scientific work on maturity that indicates a smaller maturity size than the one currently used.

- The scientific surveys carried out in the coastal and estuarine areas (NOURDEM) and all other existing information on sole nurseries, to improve the recruitment estimates.
- The activity data of the gillnetters must be included in the reference fleets used to calibrate the assessment models.
- Environmental factors must be included in the models, as their impact is quite important on recruitment.
- The reference points need to be updated according to the evolution of the biological parameters and environmental factors that impact the state of exploitation of the stock.

Aware of the workload borne by the scientific experts, we would appreciate if you could contact ICES to prioritise the programming of a benchmark procedure for the Bay of Biscay sole stock as soon as possible.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Esben Sverdrup-Jensen', written in a cursive style.

Esben Sverdrup-Jensen
President