

European Association of Fish Producers Organisations

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



EAPO / AEOP

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EAPO22-57

Oostende, 3 November 2022

To: EU Member State Fisheries Ministers

Cc: DG MARE Directorate C, Director

DG MARE Head of Unit C5

EU Council Secretariat

Dear Madam, dear Sir,

Subject: EAPO Position Paper on Fishing Opportunities 2023

A. General Context

In anticipation of the December AGRIFISH Council as well as in preparation of the forthcoming bi- and trilateral negotiations with the UK and Norway, EAPO wishes to inform you about its view on the TACs and quotas 2023 proposals and decisions.

In the past few years, the EU fishing fleet has been faced with many challenges such as massive quota losses because of Brexit, collapsed markets during the COVID-19 pandemic and lately sky-high fuel and commodity prices linked to the tragic conflict in Ukraine. An increasing number of offshore windfarms, Marine Protected Areas and other uses of marine space, the Green Deal driving the need for vessel modernisation and for decarbonisation and other social and political aspects are adding to the despair many fishers are experiencing.

EAPO in this position paper wishes to highlight the importance of having sufficient quotas for European fishers, enabling them to achieve turnovers that in turn will allow investments to be made and challenges to be met. The position EAPO puts forward here takes into account the objectives of the Common Fisheries Policy (CFP) considering the three pillars required to ensure overall sustainability.

Keeping the possibility for normal business practices for supplying sustainable food to the EU market requires that decisions made on fishing opportunities for 2023 take into account the EAPO comments in this paper.

B. Stakeholder involvement in bi- and trilateral consultations

EAPO prepares this paper considering that the EU has to reach agreements with the UK and Norway on more than 100 TACs in different bi- and trilateral consultations.

These stocks are of major importance for European fisheries. It is clear that the consequences of Brexit – including the Norway position in this – play a major role in decommissioning schemes set up in several Member States. EAPO considers it of major importance that the Commission takes on board the industry's views and succeeds in achieving the required result for the EU in the consultations.

Therefore EAPO recommends for fishing industry stakeholders to play a role in the negotiations to guarantee the socio-economic and environmental feasibility of the proposals. We believe the recent restrictions of participants to go against the defense of the sector's best interests. In this we refer to the mackerel negotiations with Coastal states where the recent unilateral quota increases have shown the limits of negotiating without a legal framework. EAPO asks the Commission to work on the toolbox they mentioned in the PelAC July meeting to ensure that the EU mackerel pelagic fishing industry is not the poor relation in the Coastal states negotiations.

Concerning the UK, EAPO's members are involved in the informal "inter-AC Brexit Forum". EAPO appreciates that this is a way to strengthen stakeholder engagement in the context of the execution of the Trade and Cooperation Agreement (TCA) and particularly the work of the Specialised Committee on Fisheries. A similar or even more involved forum between Commission and industry, addressing topics in the bi- and trilateral consultations, is considered very important by EAPO.

Spatial issues, technical measures and management principles overall play a major role in consultations about TACs and quota. An industry consultation forum would create the possibility to include EU stakeholder experience in the consultations in order to address challenges like UK MPA and wind energy development plan conflicting with EU fisheries activities and, for instance, the beam trawl ban that has been put in place by Norway in the Norwegian waters of the North Sea.

C. ICES & Quality assurance in stock assessments

EAPO realizes that the EU mandate for the consultations includes the objective to set fishing opportunities in line with scientific advice. In this respect EAPO appreciates the effort ICES has made in addressing quality assurance in stock assessments. There remains a critical need for quality assurance across all assessments in accordance with the ICES advisory plan but ICES has recognised this issue and works on making data more traceable and secure. When setting the EU approach to the bi- and trilateral consultations this quality aspect should be taken into account.

EAPO also highlights the need to include fishers' feedback into the advice for it to match to a maximum extent with their observations. This year ICES has launched its Stakeholder Engagement Strategy and EAPO is eager to work with ICES on this topic. In this there is the aspect of data discrepancies. EAPO specifically refers at the many mixed demersal fisheries in the Atlantic basin in which differences can occur between the stock status of different species. This leads to difficulties in TAC-setting based on individual stock scientific advice. We recommend counting on the fishers' experience to protect stocks identified as being in a dire state and to assist in restoring them, whilst maintaining the possibility to continue the sustainable catch of the other species in the mixed fishery.

As usual, EAPO would like to raise the issue of stock identification and how uncertainty around the degree at which two or more stocks of the same species are mixed, impacts the stock assessment process. Mismatches between stock and TAC management areas can lead to problems with the setting of reference points and to issues around management decisions. Whilst EAPO has contributed to advice on how to address this, it currently remains another reason for interpreting scientific advice when setting the fishing opportunities according to the three pillar sustainability objectives.

EAPO considers ICES's work is to ensure that stocks are scientifically assessed and that the best data is used to provide for the advice. It is EAPO's view that socio economic impacts must be considered when setting TACs to ensure sustainability is reached with enough fishers to benefit from the good state. This should particularly be the case when the Precautionary Approach (PA) is used. It is vital when considering to use the PA, to ensure the impacts on fishers are estimated and taken into account. In this respect EAPO recommends for STECF to work on assessing the socioeconomic impacts, as per article 2.2 of the CFP, before applying a PA.

Finally, EAPO would like to highlight all the work that ICES has done in the last year to benchmark a long list of stocks, ensuring the advice used for TAC setting is done at the cutting edge of the knowledge. EAPO encourages ICES to continue these efforts by carrying out benchmarks as soon as there are major new elements in the biology of the stocks or on the evolution of environmental factors (e.g. SOL/8AB as per EAPO's letter of 8 September 2022).

In respect of skates & rays and their multispecies TAC in the different areas, EAPO points at the search in process to establish an alternative management principle. We support, but also realise the difficulty in finding it, a principle for TAC setting according to the biological state of each individual stock and according to the proportion of each species in the landings.

D. Landing Obligation

EAPO maintains the position that avoidance and minimisation of unwanted catches are the ways to achieve the commonly accepted selectivity objective. When setting EU positions for the bi- and trilateral consultations and considering the issue of compliance with the Landing Obligation (LO), EAPO is not alone in finding that avoiding choke issues remains one of the biggest challenges, particularly in the EU mixed demersal fisheries.

Therefore EAPO recommends to recognise growth of the stock sizes when setting TACs. If TACs are not set in line with growing abundances such species become a chokes. In such circumstance, applying a deduction of exemption volumes when setting a TAC only increases the risk of occurrence of choke species.

On the other hand for species with low TAC advice EAPO recommends the continuation of the quota-exchange pool as mentioned in the Fishing Opportunities Regulations since 2019 to cover unavoidable

by-catches by Member States that have few or no quota for such stocks. This also covers stocks with zero catch advice for which bycatch provisions are foreseen to avoid premature closures of mixed fisheries. EAPO fully accepts that directed fishery on such stocks remains prohibited. It is imperative that this approach is maintained in the 2023 TACs and Quotas Regulation to avoid the premature closure of a vast array of sustainable fisheries.

E. Comments on Pelagic stocks

As the negotiations with Coastal States started earlier than the bi- and trilateral consultations, EAPO's Northern Pelagic Working Group published a position paper that came out earlier. ([link](#))

F. Comments on Baltic Sea stocks

Prior to the October Agrifish Council EAPO also published its position on fishing opportunities for Baltic Sea stocks for 2023. ([link](#))

G. Comments on North Sea Stocks

1. General

Overall North Sea stocks are in a good shape. Most stocks show progress or confirm the positive development in the stock size ICES presented last year.

However, EAPO is starting to see a worrying trend. More and more gaps are seen between the advice and the feeling fishers have regarding fish stocks and populations. Also ICES's advice on category 3 stocks remains hard to understand as some stocks lack some key parameters but are considered by ICES under the MSY approach.

Yet overall, ICES' advice remains the best available scientific advice and as such EAPO's position below is based on ICES figures and data. EAPO would like to stress that not all stocks have to be managed the same way. Management should be adapted to the species managed. For example, for Haddock in the North Sea, as this stock sees decennial high recruitments feeding the stock, the TAC could be set lower than the one suggested by ICES. This could be done under the condition that the TAC would then be set in the higher F_{MSY} range when the recruitment is a bit lower. The end goal being to reduce yearly variations to a minimum.

2. Cod in North Sea and Skagerrak

EAPO wishes to underline the increasing differences between the stock assessed by ICES and the one that fishers encounter at sea. With that in mind, several fishing organisations from the northern part of Europe have contacted ICES to work on that statement. A workshop has been held in October to provide input for the 2023 ICES benchmark. It is central for EAPO members that we work on including stakeholders data in ICES advice.

For the time being EAPO is prepared to maintain the extraordinary measures introduced for cod fishing in the EU until ICES assesses that the stock is larger than B_{LIM} . EAPO considers these measures to be temporary, meaning that as soon as the stock is assessed to be larger than B_{LIM} they end.

According to EAPO, the quotas for cod in the North Sea and Skagerrak in 2023 should respectively be set to 19,103 and 2,730 tons.

3. Haddock in the North Sea and Skagerrak

The haddock stock has seen an increase in its SSB due to high recruitment in the last few years, resulting in a recommended catch increase of 160 %.

With that in mind, EAPO suggests setting the TAC for haddock in the North Sea and Skagerrak in 2023 respectively to 117,048 and 7,127 tons (ICES advice suggests a total of 137 058 tons).

4. Saithe in the North Sea and Skagerrak

Just like for Cod fishers have been observing large occurrences of saithe that are not reflected in the surveys used to estimate the stock biomass. In the same way EAPO members are ready to work with ICES to include these observations in the advice.

By considering these observations in the framework of the data and advice provided by ICES, EAPO recommends setting the TAC higher than the one proposed, in a way that, according to ICES, this will leave the saithe biomass in a better state in 2024 than it was in 2022.

EAPO suggests setting a TAC for 2023 at 72,399 tons which will result in the Spawning Biomass reaching MSYBtrigger in 2024.

5. Whiting in the North Sea

For Whiting in the North Sea, the stock size is above MSYBtrigger, Fishing mortality is below F_{MSY} and recruitment is good.

After considering economic impacts, EAPO agrees with the suggested TAC for 2023 of 84,940 tons.

6. Whiting in the Skagerrak and Kattegat

Whiting in Skagerrak and Kattegat are mostly caught as bycatch from demersal fisheries. Setting a low TAC can make it a choke species. The stock size index is above its trigger and has been increasing the recent years.

For these reasons EAPO advises maintaining a TAC for 2023 on the level of one advised for 2022 (929 tons) and not reduce it.

7. Plaice in the North Sea and Skagerrak

Regarding Plaice in the North Sea and Skagerrak, fishers' observation at sea does not reflect the recent increase of biomass as described by ICES in its advice.

As such, some EAPO members would like the TAC to be set lower than the 150 705 tons advised by ICES. Other EAPO members are in agreement with the suggested increase but share the same observations in some areas of the North Sea.

8. Turbot and Brill

Turbot and Brill are managed under a combined TAC. All three stocks considered under this TAC have a fishing pressure below MSY and a SSB above MSYBtrigger.

The reduction in this year's TAC is a consequence of the downward revision of recruitment assumed last year and a decrease in incoming recruitment.

EAPO asks for a rollover keeping the TAC for turbot and Brill in the North Sea in 2023 at 5,848 tons.

9. Lemon sole/witch

The sum of the recommendations for the two species is very close to the quota for 2022 and EAPO can accept that the quota is set according to ICES recommendation.

In line with the work on assessing the stocks separately as requested to ICES EAPO recommends a rollover for the combined lemon sole and witch North Sea TAC in 2023.

10. Sole in the North Sea

For sole in the North Sea, ICES estimates that the stock size is just below $MSY_{trigger}$ and that fishing mortality is close to F_{MSY} . The ICES advice recommends a 40 % TAC reduction. EAPO insists on the need to avoid large changes in TAC and therefore suggests that the quota be set at 10 731 tons, which is a reduction of 30%. This still will give a growth in SSB a bit under 4%.

The quota for sole in the North Sea should be set at 10,731 tons.

11. Sole in Skagerrak/Kattegat

According to ICES fishing pressure on the stock is below F_{MSY} and the spawning stock size is above $MSY_{trigger}$.

The advised catch for 2023 represents a decrease from previous advice because of a revision of 2020-2021 data. In order to lessen the impact on fisheries EAPO suggests that the quota be set as a reduction of 20% compared to the TAC 2022.

EAPO advises for The TAC for sole in the Skagerrak and Kattegat in 2023 to be set to 572 tons.

H. Comments on North-Western Waters Stocks

1. General

ICES advice has outlined stock identity issues between Irish sea and Celtic Sea stocks, Celtic Sea and Channel stocks and area 6 and North Sea stocks. These issues must be addressed to ensure management and functional areas are the closest possible to the actual geographical stock situation and boundaries. EAPO members contributed to NWWAC advice on fishing opportunities for 2023 in which the examples of haddock 7a and 7b-k, sole 7e, 7fg and 7hjk and also plaice in the latter areas.

In many instances these artificial divisions do not align with biological populations and hence make accurate assessment impossible. These situations can be identified and where appropriate rectified through the application of modern genetic techniques, i.e. whole genome sequencing based stock identification. The need for the roll out of these methods should be highlighted at national and EU level and should be prioritised as without accurate input data to the assessments it is not possible to determine sustainable exploitation rates.

Regarding mixed gadoid fisheries in the Celtic Seas, three major stocks are involved: cod, whiting and haddock. The discrepancies between each species' stock status combined with the Landing Obligation makes fisheries management in this area quite complicated. EAPO considers that mixed fisheries advice is required for this purpose but the current approach to this is not adequate. In addition its publication is late when compared to the timeline of the TAC and quotas setting process.

EAPO would also like to point out the impact climate change has on fisheries and fishers, being specifically visible in the Celtic Sea. We urge the Commission and ICES to do their utmost to include this aspect in the yearly advice. Its impact is broader than only on stock assessment reference points. Including climate change impact would allow to move one step closer to implementing an Ecosystem approach to fisheries management.

2. Cod in Irish Sea

ICES advice for cod in the Irish sea is to have a 0 TAC for 2023 (74 tons were recommended in 2022).

EAPO would like to highlight the potential retrospective issues faced by this stock following the lengthy changes it underwent over the recent years: it has gone from a category 1 stock in 2018 to a category 3 stock from 2019 to 2021 and back to a category 1 stock in 2022. For European fishers the advice quality is essential to guarantee stability. For this stock the lack of stability in the advice is worrying. The usefulness of the Irish cod closure which has been in place for over twenty years has to be questioned in terms of the rebuilding the cod stock.

As cod in the Irish Sea is mainly caught as bycatch in mixed fisheries EAPO advises setting the 2023 TAC based on $F_{2023}=F_{2022}$, allowing for a lower impact on fishers as well as an 8.0 % increase in SSB for 2024.

For EAPO the 2023 TAC should be set at 170 tons.

3. Haddock in Irish Sea

The ICES advice is for a 13% reduction in catch to 2 648t in 2023. EAPO is concerned regarding the reduction as the fishing pressure is declining and has been below F_{MSY} since 2012. ICES estimated catches have been below advice since 2017 when the abundance was at the highest in the time series. These are all positive indications for the status of the stock and as such the effect of the relatively low catch on the assessment model output should be considered. The ICES advice for 2023 TAC is of 2 648 tons (3 038 in 2022) leading to a reduction of 13%

EAPO advises setting the 2023 TAC according to ICES advice.

4. Whiting in Irish Sea

For 2023, ICES advises a 0 TAC as it was for 2022. Whiting is part of the Irish sea mixed fisheries and that setting a 0 TAC will turn it into a choke species, unless a bycatch provision similar to 2022 is adopted.

In addition EAPO would highly encourage ICES to review and assess the efficiency of the recently introduced nephrops fishery technical measures in reducing whiting bycatch.

EAPO advises setting a bycatch provision for 2023 similar to 2022.

5. Sole in Irish Sea

The reduction in catch advice is caused by a combination of a downward revision of stock size and a further projected decline because of low incoming recruitments. Target F is reduced since SSB is estimated to be below $MSYB_{trigger}$ in 2023. EAPO considers that COVID related impacts on the time-line of survey data is a cause, as it seems there are inconsistencies between the survey results and the CPUE identified in a fisheries-science partnership project. In view of such available additional data, EAPO would support an initiative for a benchmark exercise for this stock. Considering the implication of the discard data in the assessment it would be worthwhile to take the survival of sole into consideration.

With that in mind, EAPO advises for 2023 a rollover of the 2022 TAC of 787 t.

6. Plaice in Irish Sea

For Plaice in the Irish Sea fishing pressure is below F_{MSY} and biomass is above $MSYB_{trigger}$. EAPO notes that the advice for 2023 is lower than 2022 because of a downward revision in the stock biomass but

finds it unacceptable that in current positive conditions a TAC would follow the downward evolution of the ICES catch advice by 60%.

With that in mind, EAPO advises for 2023 a rollover of the 2022 TAC.

7. Celtic Sea Cod

Regarding cod in the Western Channel, Celtic Sea and Bay of Biscay, ICES reconfirmed a zero TAC for 2023. This recommendation was issued because once again under all catch scenarios, median SSB would remain below B_{LIM} .

Since 2019 cod in the Celtic Sea is managed through a by-catch TAC. EAPO agrees that no targeted fisheries can and should occur and therefore recommends to retain the by-catch management.

As it was unfortunately expected by scientists (see Drinkwater, 2005 for instance) this stock is one of the very first victims of the rising of the sea temperature, which directly affects its recruitment and productivity. Aware that North Sea and West of Scotland cod stocks benchmarks are planned EAPO strongly recommends ICES to include Celtic Sea cod, assessing the situation of this stock in order to estimate if a recovery is still possible from a biological point of view.

With that in mind EAPO advises to retain the existing by-catch TAC principle in order to avoid directed fisheries and creating a choke situation for non-cod targeting mixed fisheries.

8. Haddock in southern Celtic seas and English Channel

Haddock is an important part of the Celtic Seas mixed fisheries and this stock has seen its biomass reach a relative high value since 2020 compared to the historical perception, although it appears to be slightly decreasing.

The suggested TAC for 2023 is 11 901 tons compared to the 15 946 of 2022.

As the biomass of this stock is very robust, representing more or less four times the value of $MSY_{trigger}$, EAPO recommends the strict application of the Article 4.5.c of the WW MAP and thus limit the reduction of the TAC to 20% compared to 2022, representing a 12 000 tons TAC.

9. Whiting in southern Celtic Seas and English Channel

For whiting in the Southern Celtic Seas and the English Channel, fishing pressure on the stock is decreasing since 2018, while still considered to be above F_{MSY} , and the spawning-stock size is steadily increasing since that same year.

For 2023, EAPO cannot support the ICES recommendation regarding fishing opportunities, but proposes to follow the “MSY Approach” rationale used last year, corresponding to 4030 tons, which allows an increase of the stock biomass (+14 %). The 7b-k TAC is composed of two separately assessed stocks (whiting North Sea and 7d on one hand, whiting 7bc,e-k on the other). Setting the TAC at 4030 tons would mean taking into account the North Sea / 7d stock component which is in a very favourable state.

On a sidenote, EAPO requests that a flexibility be set up between area 7d and 4c, to allow for catches to be declared in under the 2A4 TAC.

10. Sole 7hjk

The fishing opportunities for this stock have massively decreased over the last years in the context of a lack of any scientific information and due to the precautionary approach. At the same time Belgian

and French vessels have noticed an increase of their yields in the 7h zone, especially larger sizes soles, while maintaining their traditional fishing strategies.

It is clear for ICES that the management unit in terms of stock ID is not appropriate and must be addressed as a matter of urgency using modern genetic techniques. EAPO noted the work is progressing thanks to a science-industry partnership project on genetic data collection of soles specifically in the areas 7h and 7j, called SoleDNA.

EAPO recommends when setting a TAC 2023 to take into account preliminary results of the SoleDNA project and consider a zonal flexibility for with adjacent sole stocks taking into account the relative stability.

11. English Channel Plaice

The 7de TAC is a complex composition of plaice 7d and 7e stock assessments and their interaction.

Considering that mainly plaice 7d drives the TAC setting and that the SSB of this stock is above MSYBtrigger, EAPO recommends limiting the reduction of the TAC to 20% in comparison with its 2022 level according to the Article 4.5.c of the WW MAP.

12. Plaice 7fg

For this data poor stock the ICES catch advice is -77%. This is based on a biomass index established by a single survey (UKBTS) and a formula based on the stock category 3 principle. Whilst this is not a targeted stock, catches are unavoidable in some mixed fisheries. The current TAC adequately covers the required bycatch level. A 77% advice reduction, leading to a similar TAC reduction cannot be explained to the active fishers, as they appear to have much more relevant information on this stock than the index data coming from a single survey used in a theoretical formula.

Therefore EAPO recommends to avoid TAC movements of this size and asks to at least apply the stability clause limitation which is currently a maximum reduction of 30%. In line with the lack of knowledge and with what fishers are experiencing at sea, a roll-over of the TAC would even be a more logic approach.

13. Sole in Western English Channel

While in 2022, the spawning stock biomass of this stock has reached a new highest with 5624 tons, ICES proposes to decrease the TAC to 1,394 tons in 2023, compared to 1,810 in 2022, representing a -23%. This assessment is to a high extent affected by a downward revision of the 2021 recruitment hypothesis by 5%.

After three exceptional years the very low recruitment in 2021 (the lowest since 1994) should be considered as a possible disturbance which would impact the stock independently of the fishing pressure.

As the SSB is well above MSYBtrigger and F is at F_{MSY} , EAPO recommends to restrict the TAC reduction to 5%, similar to the corrective percentage of the 2021 recruitment.

14. Sole in Eastern English Channel

ICES advice for this stock was delayed because of doubts about the accuracy of some data. In October the advice was confirmed to be a 27% reduction of the TAC based on a large downward revision of recent recruitment and the recalculation of the reference points.

With that in mind and avoiding excessive fluctuations, EAPO asks for an application of the F_{MSY} approach (TAC 2022 -11.1%) as this would still result in an increasing SSB in 2023.

15. Cod West of Scotland

ICES issued zero catch advice for cod in division 6a. The management measures taken so far around this stock need to be questioned and evaluated, as they have not resulted in a recovery of the stock. A strong focus needs to be placed on rebuilding this stock, which takes into account the potential consequences of other aspects like climate change and predation. The 2020 benchmark for 6.a cod identified significant stock identification issues concerning this and adjacent cod stocks. In response to this the ICES Workshop on Stock Identification of West of Scotland Sea Cod (WK6aCodID) was convened in 2021 to review existing data. The workshop concluded that there were multiple subpopulations of cod in division 6.a and recommended to combine the North Sea and West of Scotland cod assessments in a future benchmark. It was also noted that future work applying full genome sequencing with full site and temporal replicates would provide in-depth information regarding subpopulations at finer geographical scales and the stability of these structures across time. This is particularly relevant to cod in the Irish waters of Division 6.a as they received relatively little attention during the workshop.

For EAPO it is imperative that the Commission's approach of setting low-level TACs for by-catches only is maintained as part of the 2023 TACs and Quota to avoid the premature closure of a vast array sustainable fisheries.

16. Haddock in West of Scotland

ICES advice for Haddock in 4,6a,20 is 137 058t, which is a 6.5% increase on the advice for 2022. Haddock in division 6a is assessed as one single stock with the North Sea and Skagerrak (4, 20), with 10% of the TAC being allocated to division 6a. Note that the three areas are considered separately in terms of management. Last year ICES advice increased by 86% which if implemented would have resulted in a 154% increase in TAC. However the TAC was only increased by 5%. The full scientific advice was not followed due to the North Sea tri-lateral negotiations between the EU, the UK and Norway agreeing a lesser increase for the North Sea which had a knock-on effect of also a lesser increase in 6a.

EAPO is requesting that this is not repeated for 2023 and 6.a is treated differently to the North Sea if the decision in the tri-lateral negotiations is to again revert to a lower increase than advised.

17. Hake in areas 6 and 7

EAPO has no comments on the catch opportunity suggested by ICES for 2023, but wishes to draw the attention of the EU to the risk of destabilising the Union's share of the TAC on the discussions with third countries on the distribution of the stock.

18. Pollack in Celtic Seas and the English Channel

The advice for Pollack in Celtic Seas and the English Channel sets a recommendation for 2023 identical to the 2022 one. As no new advice has been published, EAPO asks for the 2022 TAC to be applied as well for 2023.

EAPO would like to highlight the need for better data collection to allow the stock to go from category 4 to category 1 if possible. To add to this request, better data on recreational fisheries, known to have a significant impact on the stock, would allow to avoid what has happened on the seabass stock. A point of interest would be to work on better defining the stock ID and its distribution over areas 6 and 7 through the application of modern genetic techniques, i.e. whole genome sequencing.

19. Spurdog 1-10, 12, 14

EAPO is pleased to note that a 17 353 TAC for 2023 is recommended by ICES. After so many years of fishing prohibition, having resulted in an impressive increase of the SSB, it is important to authorize catches and landing of this species.

I. Comments on South-Western Waters

Regarding Fishing opportunities for 2023, most South-Western Waters stocks have benefited from a series of benchmark, allowing for most stocks to have increased TAC advice for 2023.

1. Hake 8abde

EAPO members wishes to highlight the benchmark ICES did which has given an assessment in line with the observations of fishers. This benchmark led to a revaluation of the biomass with an increase of 71 %.

EAPO suggests following the ICES advice of setting the 2023 TAC to 83 130 tons.

2. Hake 8c, 9a

Regarding Hake in the Cantabrian Sea, fishing pressure on the stock is below F_{MSY} , and SSB is above MSYBtrigger. The advice increases by 70% due to a change in assessment and advice basis, from PA (category 3) to MSY (category 1) and a change in the perception of the stock with an increase in SSB in recent years with the new assessment. EAPO welcomes the change of category for the stock, allowing to apply the MSY approach instead of the precautionary approach.

EAPO suggests to follow ICES advice of setting the 2023 TAC to 11 791 tons.

3. Sole 8ab

The ICES suggested increase in fishing opportunities of 20 % is not a consequence of the stock being in a better state, but because of a revision of the recruitment level. The decreasing trend of the recruitment is continuing. 2021 has seen the lowest recruitment since the beginning of the historical series. This has led EAPO to address a letter to the Commission asking to request ICES for a benchmark. [\(link\)](#)

EAPO suggests following the ICES advice and setting the 2023 TAC at 2685 tons.

4. Sole 8c, 9a

As no new advice was given in 2022 and since the last advice gave no sign of decreasing stock size, **EAPO asks for a rollover of the 2022 TAC for 2023.**

5. Megrim 8abde

Regarding megrim in the Bay of Biscay, fishing pressure is below F_{MSY} and biomass is above MSYBtrigger. The advice for 2023 is higher than 2022 because of a re-estimation of F_{MSY} . The 2023 fishing opportunities suggested by the advice are 24 176 tons, compared to 22 964 tons in 2022.

EAPO suggests following the ICES advice in setting the TAC and asks that the interzone flexibility between areas 7 and 8 are kept (35 % for France and Spain and 10% for Belgium).

6. Megrim 8c, 9a

Regarding megrim in the Cantabrian sea, fishing pressure is below F_{MSY} and biomass is above MSYBtrigger. The advice for 2023 is 75% higher than the advice for 2022 because the stock was benchmarked in 2022 and a new model estimates a higher recruitment and SSB in recent years.

EAPO supports the **2023 fishing opportunities suggested by the advice at 968 tons, compared to 553 tons in 2022.**

7. Anglerfish 8abde

Regarding Anglerfish in the Bay of Biscay, **EAPO suggests following the ICES advice** in setting the TAC and asks that the interzone flexibility between areas 7 and 8 are kept (10 %).

8. Anglerfish 8c

Regarding Anglerfish in the Cantabrian Sea, **EAPO members suggest following the ICES advice** in setting the TAC.

9. Pollack 8abde

EAPO would like to point out the limits of the precautionary approach when a stock is considered as data deficient. For pollack, where the industry is closely working with scientists to improve data and stock assessment, reducing the TAC by 20 % every few years is counterproductive. This leads to an important decrease in fishing opportunities completely uncorrelated to the actual state of the stock. EAPO also would like to point out the need to better control recreational fisheries.

As no new advice was given in 2022 and since the last advice gave no sign of a decreasing stock size, EAPO asks for a rollover of the 2022 TAC for 2023 and recommends to keep the 2% flexibility between area 8 and area 7.

10. Whiting 8

EAPO suggests following the ICES advice to rollover the 2022 TAC for 2023, resulting in 2276 tons.

11. Plaice 8, 9a

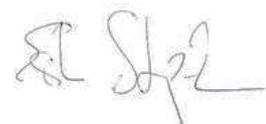
EAPO suggests following the ICES advice to rollover the 2022 TAC for 2023, resulting in 155 tons.

J. Concluding statement

EAPO members look forward to be kept apprised about the proceedings and continue to stand ready to provide their input based on PO experience to their respective Member State Fisheries Ministries and Administrations, and to the Commission. EAPO in turn is the platform to consolidate such PO-experience on this topic and remains available to contribute to the preparation of the bi- and trilateral consultations and of the December Council.

Looking forward to your views and wishing you every success at the upcoming meetings, I remain,

Yours Sincerely,



Esben Sverdrup-Jensen

President