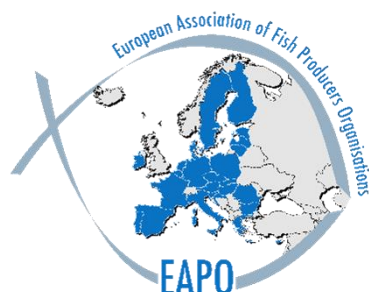


European Association of Fish Producers Organisations

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



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**Letter by e-mail attachment to:**

**To:** DG MARE Directorate C, Director

DG MARE Head of Unit C5

EU Council Secretariat

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## **SWWWG Position paper on fishing opportunities for 2024**

### ▪ *Overall comments on South Western Waters*

EAPO members would like to begin by highlighting the positive light that was shone on South Western Waters stocks by the Commission's state of play for 2024: *"To illustrate the value of sound management, in the Bay of Biscay, for the first time under the common fisheries policy (CFP), no stocks were overfished in 2021."* Despite the lack of overfishing in 2021 and the prominent level of abundance, the situation has changed in 2023. ICES's advice on fishing opportunities for 2024 for South Western Waters suggests decreasing catches for 2024 for most stocks.

This generalized decrease in all stocks in the Bay of Biscay shows that there is a need to address other impacts on top of fishing. EAPO members have listed the following.

Last year, EAPO members sent a letter to ICES and the Commission requesting that a benchmark on sole in the Bay of Biscay be carried out. EAPO members happily welcome the recent data call for a benchmark for sole in the Bay of Biscay. This occurred because of declines in recruitment attributable to climate change. Despite annual compliance with the fishing opportunities set in line with ICES advice, and compliance with European fishing legislation, recruitment levels for south western waters stocks are gradually declining, reaching the lowest values in the time series. Spanish research has shown that climate change is affecting Bay of Biscay stocks. Climate change's increasing impact could jeopardize the benefits of fishing reductions for some recovered target species (e.g., European hake) and could have detrimental impacts on several target species already impacted by ocean warming (e.g., European sardine). Including this impact would allow fishers to gain visibility, which is why **EAPO members request that an extensive analysis be carried out to assess the full extent of climate change's impacts.**

EAPO members also take note of the proposal for a Council Regulation fixing for 2024, 2025 and 2026 the fishing opportunities for certain fish stocks<sup>1</sup>. In South Western Waters, 7 multiannual TACs have been suggested: pollack 8abde, pollack 8c, pollack 9&10, whiting in 8, plaice 8,9 & 10, sole 8cde, 9 & 10 and Norway lobster in 8c FU 25. EAPO members welcome this initiative, which aims to improve fishers' visibility into their fishing opportunities. However, it is crucial to note that this initiative affects stocks for which scientific assessments show a significant decline, with significant consequences for fleets depending on them. This multi-annual approach should introduce gradual changes in fishing opportunities to bring stability while preserving the balance of affected fleets and aiming to achieve MSY.

Finally, the recent approach from ICES on category 3 data limited stocks is very concerning. For the rfb, chr and rb rules, they all compute the suggested TAC for the incoming year by multiplying several index ratios (fishing pressure proxy, stock biomass trend...) by a generic multiplier based on life history, and the previous catch advice or index abundance. It includes a stability clause for when the biomass safeguard ratio is above 1.

For south western waters stocks, the rfb approach has been used for pollack 8 and whiting 8. With both these stocks in mind, EAPO would like to reiterate its opposition to using catches from previous years as the reference point for determining fishing opportunities for the coming years. This approach means that TAC underutilization is automatically attributed to the stock being in a bad state, completely disregarding other factors. This is very counterproductive as it invites fishers to fully use their quotas, which can not be appropriate.

Secondly, EAPO members believe that life cycle parameters of the stock are covered in r (Stock biomass trend), f (fishing pressure proxy) and b (biomass safeguard). We would like to accent the critical role of analyzing these indicators as proxies of the stock. Moreover, the reduction of fishing opportunities will have a positive impact on all three indicators. Since life cycle parameters are already part of the calculation of fishing opportunities, EAPO members would like to pinpoint that there is no need to adopt a final generic multiplier based on life history. This is true if biological information is correctly included in the calculation.

In that sense, applying the mean of the available indicators would be much more balanced. As emphasized in our Joint NS-NWW advice<sup>2</sup>, EAPO members would like to ask that **more time be invested in developing**

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<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2023:587:FIN>

<sup>2</sup> <https://eapo.com/swfiles/files/download.php?myfile=EAPO23-59-EAPO-NWWWG-NSWG-position-paper-on-fishing-opportunities-for-2024.pdf>

**new models to increase the number of category 1 stocks rather than developing new precautionary approaches.**

Fishers are requesting visibility and stability when setting TACs. Multiannual TACs are a first step towards visibility and stability. However, the changes in methods and the downwards revisions of key indicators led to huge modifications in advice over two years. The change in advice for pollack and whiting due to the use of the rfb approach, the downward revision of seabass recruitment are examples of these shifts. EAPO members ask that variations in model and in data be included over two years to ensure stability and visibility.

- [Stock by stock approach](#)

#### [Hake 8abde \(Merluccius merluccius – HKE/8ABDE\)](#)

**EAPO recommends that for 2024, a rollover TAC from 2023 be agreed. EAPO's recommendation translates into setting the 2024 TAC at 83,130 tonnes.**

EAPO members would like to stress the significant number of limitations linked to ICES advice on hake. The decline in SSB used in the advice does not include the entire hake population. ICES advice needs to cover the whole population.

The recent changes in fishing patterns due to the implementation of the Deep-Sea access regulation closing 87 areas to fishing are not encompassed in the advice. This should be incorporated in the advice to show the impact of this regulation of hake stocks.

Overall, EAPO members would like to bring attention to the essential aspect of carefully considering the geographical distribution of the stock among third countries, ensuring that such distribution does not result in a shift in the overall Total Allowable Catch (TAC) allocation that would negatively impact the TAC within zone 8abde.

#### [Hake 8c 9a \(Merluccius merluccius - HKE/8C3411\)](#)

**EAPO recommends that for 2024 a rollover TAC from 2023 of 15,925 tonnes be set.**

EAPO recommends that for hake 8c9a a rollover TAC from 2023 be agreed. EAPO's recommendation translates into setting the 2024 TAC at 15,925 tonnes. EAPO's recommendation is in line with ICES recommendation.

#### [Sole 8ab \(Solea Solea – SOL/8AB\)](#)

**For Sole 8ab, EAPO members recommend that the TAC be set at 2489 tons, corresponding to the upper range of FMSY.**

### [Sole 8c 9a \(Solea spp – SOL/8CDE34\)](#)

**EAPO's recommendation for sole 8c9a translates into setting the 2024 TAC at 320 tonnes.**

Despite Sole 8c9a being a category 3 stock, this stock is crucial for EU fishers. ICES recommends reducing catches by 35% compared with ICES advice 2022/2023. From an EAPO point of view, we recommend keeping SOL/8CDE34 TAC in line with ICES recommendation for 2022/2023 (320 tonnes instead of 209 tonnes that is advised for 2024/2025).

Sole is a non-target species but there are still significant catches, and a reduction of the TAC could make this stock a choke species.

### [Megrim 8abde \(Lepidorhombus - LEZ/8ABDE\)](#)

Considering the south western waters multiannual plan and ICES advice, EAPO members advocate for a TAC set in line with FMSY as recommended by ICES. **The TAC for megrim in 2024 would be 3 622 tonnes (2351+1271).**

### [Anglerfish 8abde \(Lophiidae - ANF/8ABDE\)](#)

EAPO members request that the TAC for anglerfish for 2024 be set in line with ICES advice. **This would set a TAC of 61 081 tonnes (35 502 + 25 579).**

### [Anglerfish 8c \(Lophiidae – ANF/8C3411\)](#)

For anglerfish in 8c, EAPO members request following ICES advice and setting the 2024 TAC in line with the MSY approach. **The TAC should be set at 4650 tonnes (2111+2539).**

### [Pollack 8 \(Pollachius pollachius - POL/8ABDE\)](#)

EAPO members would like to foreground the difficulties faced by the sector due to the 0 TAC advised for pollack in areas 6-7. Usually, interzonal flexibilities allowed for fish to be caught in area 8 and reported in area 7. Reducing both pollack in 6-7 and pollack in area 8 would have significant implications for fishers.

EAPO members regret that ICES's new "rfb rule" translates into recommending a 53% reduction in fishing opportunities for 2024. Halving pollack landings will have dramatic impacts on fishers.

Since ICES's new approach to fishing opportunities setting for pollack in area 8 leads to such changes, EAPO members would like to suggest a progressive approach. 2 indicators suggest a -20% gap to the reference situation, and the last one being above the target. As a pragmatic approach of considering these indicators, **EAPO would like to recommend a -20% reduction of fishing opportunities, compared to the 2023 TAC, to stick with the worst gap to the reference situation.**

### Plaice 89a (Pleuronectes platessa – PLE/8/3411)

EAPO members would like to point up the automatic decrease in fishing opportunities every three years due to lack of data is not fit for purpose. **EAPO members are asking for a rollover TAC of 155 tonnes.**

### Whiting 8

Similar to pollack in area 8, whiting 8 has gone from being a category 5 to a category 3 stock. This should be a positive development but leads to a 41% decrease of fishing opportunities for 2024 & 2025. For the same reasons as pollack, EAPO members reject the use of the mean catches and the life history multiplier for the determination of 2024 fishing opportunities.

For this stock, two indicators are slightly above the target, while one indicator (biomass safeguard) exhibits a deficiency, as the most recent index value is not sufficiently distant from the proxy of the precautionary biomass.

**Considering all these indicators, EAPO recommends a 5% reduction of fishing opportunities compared to the 2023 TAC.**

### Seabass 8ab

Despite there being no TAC for seabass in this area, ICES provides an advice with an advised total removal between 2249 and 2642 tonnes using the EU western waters Multi Annual Plan.

In a similar vein to sole in 2022, seabass advice is 22% lower than in 2022 due to a downward revision of the recruitment in years 2017–2021. This downward revision makes the SSB go under  $MSY_{trigger}$  leading to the application of the harvest control rule. The overall reduction in total removal being of 30%.

As stated in the introduction, the Bay of Biscay is in a dire situation with most stocks being faced with reductions in fishing opportunities. **While EAPO members agree that total removals must be reduced in line with the MSY approach, we request that the decrease be distributed over 2 years to limit the impacts on fishers.**

Finally, EAPO members believe that the state of play of seabass in the Bay of Biscay justifies setting harsher compulsory management measures for recreational fisheries. EAPO members are in line with the Commission's proposal to reduce the bag limit for recreational fisheries to 1 fish/day.

Yours Sincerely,



Esben Sverdrup-Jensen

President