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



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EAPO position paper on North-Western Waters and North Sea Stocks

General Comments for North-Western Waters stocks

Why the MSY doesn't pay?

After a few years of improvement in North-Western Waters and the North Sea (2014 - 2018), both in terms of increasing biomass and reduced fishing mortality for many important stocks, in line with the requirement in the CFP to fish all stocks at FMSY, we are now seeing a distinct reversed trend. This is despite TACs being set very much aligned with ICES advice, at FMSY, below FMSY when SSB was below FMSY B-Trigger and the application of the precautionary approach.

Regarding FMSY, there is a real need for European fishermen to understand why, in contrast to what was promised, this yield measure is not paying off. Indeed, for some stocks, warming seas are clearly impeding them from achieving their life cycle in accordance with historical references (cod in the Celtic Sea or in the English Channel). However, the global Climate Change situation does not explain why other stocks are depleted or deteriorating rapidly (*i.e.* northern hake).

In this context, it is important for EAPO to understand the density-dependent (DD) mechanisms occurring in stock development, and to integrate the results of these mechanisms into management. As fully documented in ICES WKREF2 section 5.3, the current ICES advice incorporates only one of the four DD mechanisms, and due to the general increase in the biomass of European stocks, intra- and inter-specific competition mechanisms may now play a key role. EAPO contends that the European

Commission and ICES need to consider how best to integrate these mechanisms into the annual advice, and not to ignore this when setting fishing opportunities.

First feedback regarding ICES new category 3 rule

Regarding the precautionary approach, EAPO reiterates the recommendations provided last year¹, particularly regarding the cumulative aspects of the new ICES Category 3 rules, which can have potentially enormous consequences. This also applies to the use of the “m” multiplier, which is a matter based on a political decision.

Taking anglerfish 6 (which is now assessed in Category 1 following a benchmark) as an example, EAPO considers that the RFB rule in 2022 for this stock was extra-precautionary. At the very least, it demonstrates that the use of an index that is not properly designated to reflect the inter-annual variation of a stock should not be recommended.

Taking advantage of Court of Justice of the European Union (CJEU) Decision² to avoid “choke species”

Beyond the scientific advice, EAPO members want to highlight the results of the CJEU decision of January 2024, concerning stocks for which the scientific recommendation is for zero catch. Accordingly, consistency must be sought by political stakeholders when adopting TACs in the context of a Landing Obligation, to avoid choke species situations.

Stock-Specific Comments

Pollack VI – VII

EAPO remains deeply concerned about the zero-catch advice for pollack in subareas 6 and 7. This creates a severe choke situation for all stocks caught in the mixed demersal fisheries in the Celtic Sea, Channel, Irish Sea and West of Scotland, as well as some pelagic fisheries where pollack can be a bycatch. The economic impact is even more dramatic for liners and netters, who target this stock. Due to the relatively small size of their vessels, they are faced with very difficult situations as they have few other fisheries to divert.

We take note that a benchmark was carried out for this stock in 2023 (WKWEST), resulting in a revised perception of the stock. A downward trend is apparent. However, we note that ICES recommends further work to be carried out to improve the assessment and its reliability: *“The surveys used to calculate the biomass index do not target preferred pollack habitat, and the index is based on few samples”*. Recreational catches are also not included in the assessment, making it difficult to provide accurate advice for fishing opportunities in this context.

EAPO appreciates the fact that the stock is to be benchmarked again in 2025, in line with the ICES timetable, but we emphasize that the use of available historical data could help improve the advice. In the meantime, if new data should become available on this stock, then this data should be immediately incorporated into the assessment. EAPO also highlights that the management area for this stock

¹ <https://eapo.com/swfiles/files/download.php?myfile=EAPO23-59-EAPO-NWWWG-NSWG-position-paper-on-fishing-opportunities-for-2024.pdf>

² https://www.stradalex.eu/en/se_src_publ_jur_eur_c_just/document/cjeu2024_C_330_22_57

(currently the full VI and VII zones) should be investigated to confirm whether there are multiple stocks in the area.

Given this context, **EAPO recommends a 1,200 Tons TAC for 2025** as a reasonable figure between the need to improve the stock status, and the economic situation of several fleets that depend heavily on this stock.

Nephrops VII

Overall EAPO notes the advice for *Nephrops* in ICES sub-area VII is for a 12% decrease in landings across all the Functional Units (FU). EAPO notes that all the assessments indicate that all the stocks are exploited below FMSY, while four stocks, FU 14, FU 17, FU 19 and FU 22 were estimated to be below MSY B-trigger in 2024. This reduced abundance results in the reduction in the overall catch advice. The reduction in catch advice across all FUs will have a significant impact on EU fleets in the order of €12 million.

EAPO has concerns regarding the -25% reduction advised for FU16 (Porcupine Bank). While EAPO acknowledges this reduction comes on the back of successive increases in the TAC in recent years, nonetheless a 25% reduction in catches will have a significant impact on EU fleets operating in this FU. EAPO notes the ICES advice highlights that the mean weight for this stock has been declining since 2006, which is indicative of increasing fishing effort. Therefore, EAPO recommends the appropriateness of the current EU closure in May is reviewed and whether the timing and duration of this closure should be changed to provide better protection to the stock. In this regard, EAPO notes that Ireland has put in place a voluntarily closure of the fishery during June-September for the last few years. The impact of this measure has not been fully assessed. Since 2020, industry self-sampling has been used to derive mean weights, and EAPO agrees with ICES that this sampling should continue.

EAPO also has concerns in the advice for FU 15 (West Irish Sea) where ICES has advised for a 14% reduction in landings. According to ICES this decrease in the advice is because of a lower observed abundance. EAPO notes that there has considerable amount of survey activity related to Offshore Renewable Energy (ORE) development in the Irish Sea in recent years. However, the impact of such survey work has not been assessed. Anecdotal information from fishermen operating in the fishery report that for long periods after such survey work has been completed, *Nephrops* catches have been significantly reduced. EAPO recommends that before any further survey work is carried out, an assessment of the impacts of previous surveys should be carried out.

Celtic sea

Cod VII

According to ICES, since 2022, the level of catch of this stock is in line with the by-catch TAC level set. Increasing selectivity further for this stock is not possible, and regarding fishing mortality, it should be borne in mind that a significant number of vessels operating in the Celtic Sea (CS) were decommissioned during 2023. The resulting reduction in fishing mortality has not yet been fully factored into the advice. At the same time, recruitment is at a historically low level in 2023 with a value of 97 Tons, which represents only 10% of the 2015-2023 historical mean used in the assessment. This value is evidence that CS waters are no longer appropriate for the life cycle of such a boreal species.

EAPO refers to the recent webinar organized by the NWWAC on climate change impacts on cod in the Celtic Sea. Relevant research was discussed, specifically on how water temperature can influence reproduction, embryonic development and larvae survival. EAPO appreciates that ICES is working towards a more solid understanding the impacts of climate change on fish populations and towards incorporating such effects into the assessment. EAPO requests ICES examines whether, given current sea surface temperatures in the CS, recovery of this stock is still possible. **In this context, EAPO recommends a by-catch TAC level of 644 Tons for 2025 to avoid choke situations in mixed demersal fisheries in the CS.**

Whiting VII

Last year, for the first time, fishing opportunities were divided between the Western Channel and Celtic Sea (7b,c,e,f,gh,j,k) on the one hand, and the Eastern Channel (area 7d) on the other, to align the TAC areas with the management areas used by ICES to assess the stocks.

EAPO regrets that this split has been carried out at a time when the identity structure of the NS whiting is complex, as stated in the 2020 benchmark: *“A review by Reiss (Reiss et al., 2009) of genetic population studies suggest there is little evidence of heterogeneity within the NE Atlantic whiting stock including the northern North Sea”*. It is difficult to understand how the North Sea (NS) and the CS stocks can have such a different scientific perception. Migrations between these stocks and the local dynamics should be studied, complimented with new genetic studies to determine the true stock definitions.

As the scientific advice this year is very similar to last year, and **in order once again to limit the choke species risk, a roll-over of the 2024 TAC for the CS and 7e is recommended for 2025.**

Haddock VII

EAPO Members are concerned about the sharp decline in the advice (-44%) for this stock and highlight a mismatch between the available quota and the situation observed by fishermen on the fishing grounds. In our opinion, new technical measures introduced in the CS, with more selective gears, have had an impact on recruitment in the assessment. In addition, as with cod, climate change is undeniably having an impact on the haddock life cycle and stock recruitment. As the biomass of this stock is considered by ICES to be above MSY B-trigger, **EAPO members recommend to use the 4.5.c provision of the NWW MAP, in order to limit the TAC decrease to 20% between 2024 to 2025.**

Regarding the assessment of this stock, there is a need to address the issue related to the continued inclusion of catches from rectangles 33E2 and 33E3 in division 7a. This should be considered when setting TACs, as a consistent portion of the 7a catch is part of the division 7b–k stock, and efforts to examine stock’s genetics should be prioritized to improve the stock definition.

Plaice VIIf,g

EAPO highlights plaice 7f,g as a stock that definitely constitutes one the main example of the variability of scientific advice and corresponding fishing opportunities. After having seen a first dramatic cut of 77% of the fishing opportunities for 2023 and 2024, ICES has now proposed a further 72% cut for 2025 and 2026, which if agreed, would represent a 94% decrease of fishing opportunities since 2021.

EAPO points out that the necessary data justifying such an extreme precautionary approach is lacking. Fishermen report seeing an abundance of this stock in the northern part of 7f,g whilst the index used for the biomass indicator (r) trend appears to be based on a single survey in the southern part of the

area. **EAPO recommends applying the stability clause to avoid significant fluctuations in the TAC year-on-year.** Accepting this is a data-limited stock, it is unacceptable to disregard the unavoidable catches of this stock in a mixed fisheries context and set a TAC at such low levels that will undoubtedly create choke situations.

Sole VII f,g

For sole 7f,g the advice change is -9.3%, based on a downward revision in stock size. This is an example where the NWW MAP provisions could help to reflect the abundance noted by fishermen at sea. **In view of a +52% change in $F_{MSY\ upper}$ advice, EAPO recommends that the Commission, in the context of bilateral negotiation with the UK, proposes a higher TAC for 2025.**

Sole VII h,j,k

Fishing opportunities for this stock have been drastically reduced in recent years due to a lack of data and the application of the precautionary approach. In the meantime, Belgian, Spanish and French vessels have noticed an increase of their yields in the 7h zone, especially larger sizes soles, while maintaining their traditional fishing strategies. Spanish fishermen are struggling with large by-catches of sole, which they are unable to land due to the lack of quotas. This lack of quotas while catches are constant makes sole a clear example of a choke species situation.

For sole 7h,j,k there is no new advice for 2025. Considering that for this data poor stock a bi-annual TAC would seem the only option.

EAPO advises:

- **The Commission requests ICES to incorporate the results of the SoleDNA Fisheries-Science Projects on stock assessments and DNA analysis into subsequent advice.**
- **All available flexibilities (zonal or interspecific) should be explored, in order to mitigate the choke situation**
- **This stock should be prioritized to be Benchmarked by ICES.**

Channel

Lemon sole IV, IIIa and VIId

While it is acknowledged that the 30% decrease in the advice for lemon sole in subarea 4 and divisions 3a and 7d is linked to a decreasing pattern in the biomass index, this is in contradiction with what is experienced at sea by fishermen. This stock is an example where better consideration of the fishermen's knowledge would enable to provide a more realistic assessment of the state of the stock.

Plaice VIIe

Like lemon sole, EAPO expresses concern regarding the decrease in the advice for plaice 7e, as the RFB rule applied to the assessment leads to a -24% reduction in the catch advice. This is based on very limited data and contradicts the experience of fishermen. The advice mentions that *“mature individuals from the plaice stock in Division 7.e and the stock in Subarea 4 and Subdivision 20 migrate to Division 7.d in the first quarter. Thus, a proportion of catch of these two stocks occurs in Division*

7.d", which leads to the catch advice for plaice 7e being reduced. It seems more appropriate that this aspect is handled in management considerations, for example by introducing inter-area flexibility between 7d and e. EAPO would like to highlight that the increase in discards recorded in the advice brings a negative perception. This comes at the expense of their efforts to return fish alive back to sea, under the survivability exemption in place. The same applies to other similar stocks for which a high discard rate is reported in the advice but an exemption is in place.

Sole VIIId

For sole 7d, the advice is based on F_{MSY} corrected for the SSB status, resulting in a -19.6% change. If the correction is not applied, the $F_{MSY\ advice}$ would result in a +12.8% increase in the catch advice. Given the discrepancy between the ICES advice, the fishermen experience at sea, and taking into consideration the socio-economic impact on fisheries targeting sole in Western Waters over the last couple of years, **EAPO recommends negotiating with the UK to deviate from the advice and to follow the F_{MSY} principle.**

Sole VIIe

For sole 7e, F and SSB are in a positive state compared to the reference values, which results in a +8.9% advice change. However, because the managers agreed to not follow completely the advice last year, ICES now advise that catches should be reduced by -2.8%. Considering the positive perception of the stock, **EAPO recommends considering the F_{MSY} upper option and set the TAC closer to the corresponding +11.4% catch advice.**

Irish SEA

EAPO reiterates its' concerns regarding several stock identity issues, between certain Celtic Sea and Irish Sea stocks, relating to rectangles 33E2 and 33E3. For several stocks (*i.e.* haddock, whiting), the assessment area is not aligned with the management area, which is problematic. This may have a bearing on the management of these stocks, and it is therefore essential to remedy this through stock genetics.

Whiting VIIa

Regarding Irish Sea whiting, EAPO highlights the significant efforts from the sector regarding implementation of avoidance measures for whiting caught in the *Nephrops* fishery. The SSB for this stock continues to be extremely low, with low recruitment. The advice states that constant quantities of fish are caught as by-catch every year, mainly in the *Nephrops* fishery.

EAPO highlights the need to evaluate the efficiency of technical measures introduced in 2019 for the *Nephrops* fishery in reducing whiting by-catch. It should also be pointed out that recent Irish attempts to reduce whiting by-catch have resulted in significant socio-economic impacts on the *Nephrops* fishery, which make such selective gears not economically feasible to adopt. Given the predominance of small whiting it has remained challenging to increase selectivity without reducing marketable catches of other species. EAPO is aware that ICES is planning to work on rebuilding plans for a few depleted stocks including whiting 7a and encourages these efforts to consider whether rebuilding the stock is realistic or whether reference points need to be modified.

Plaice VIIa

EAPO considers that plaice in the Irish Sea is another example where fishermen observations at sea do not correspond to the advice which is for a 21% reduction for 2025. F is below F_{MSY} and SSB below MSY Btrigger. As it is perceived that a TAC reduction will only lead to an increase in discards, and as plaice in 7a is mainly a by-catch in other fisheries, **EAPO recommends considering setting the TAC closer to F_{MSY} upper**

West Of Scotland

Whiting VI

Given the enormous and unexplainable difference in stock status between whiting IV and VI stocks, and because for other stocks, including gadoids, there is a common assessment between zone 6a and the North Sea, **EAPO recommends that new scientific research on the identity of the stock should be carried out for West of Scotland and North Sea whiting.**

Cod VIb

Cod in 6b is currently assessed as a category 6 stock. As landings are strongly limited by quotas (set at low levels for years), and the assessment is based on landings data, the catch advice is rarely changed. In recent years, signs of increasing abundance have been challenging fishermen operating in the area, given the low level of the TAC (the Union TAC for 2024 is 20 tons). As this stock has been assessed as being at a very low level for many years, Member States have not devoted resources to improving the quality of the data used for assessment. This implies that the stock is still assessed as data-poor and that ICES applies the precautionary approach; therefore, even if abundance increases, the TAC does not. Without any further information, it is not possible to move the stock to a category 3 assessment.

To prevent this stock from becoming a choke species, EPAPO recommends that ICES reconsiders the usefulness of continuing to apply advice for category 6 stocks in situations where such advice does not reflect the reality observed on the fishing grounds. Alternative management approaches should be considered in the context of the EU/UK negotiations for this and other stocks in a similar position.

General Comments for North Sea stocks

For several species, the TAC for 2024 has been set at a lower level than that recommended by ICES (and drastically lower in the case of cod). Taking a closer look at the biological recommendation, where the stated change is the difference between what ICES recommended for 2024 and what they recommend for 2025, it does not correspond to the change seen for the advised catches. This applies, for example, to haddock and whiting where the change in relation to the TAC is respectively -5.5% and +148%.

EAPO is satisfied that, for most species, stock assessments indicate an increase in stock size and, perhaps even more positively, a situation where all the important demersal species are within safe biological limits. This means that even for species where ICES recommends a reduction in fishing, it is probably more a question of a natural variation in the stock size rather than the decline being a consequence of overfishing. For several species, there are also populations that spread over several management areas and the development is not necessarily the same in all these areas. For example, the fishermen in the northern part of the North Sea recognize the decline in the occurrence of lemon sole as described by ICES, while the fishermen in the Skagerrak can see a significant increase in catches. Therefore, EAPO is not convinced that the division of the quotas for lemon sole, whiting, turbot and brill and the determination of quotas in different management areas has been made on a relevant basis. However, EAPO acknowledges that the possibility of transferring quotas between adjacent administrative areas alleviates problems with "uneven" fishing opportunities. It is important that this option is maintained for Member States with quota in both areas.

Haddock

The development in the stock of haddock in and around the North Sea has been very positive over several years. However, the ICES advice estimates that a lack of recruitment in 2024 will cause a decrease in the spawning stock biomass. As a result, the stock in 2025 will be at least 20% lower than it was at the start of 2024. This decrease is not attributable to an increase in fishing mortality. In recent years, the quota has been set significantly below the level recommended by ICES and the actual fishing mortality is less than half of F_{msy} .

ICES recommends that the total catch for the stock is reduced by 25% compared to what was recommended for the fishery in 2024. As the quotas for the three relevant management areas for 2024 were set somewhat lower than ICES's recommendation, implementation of ICES's latest advice will result in a reduction of 5,5% for the TAC. **EAPO suggests setting the quota for haddock in the North Sea in 2025 at 95,817 tons and the quota in the Skagerrak/Kattegat in 2025 at 5,893 tons.**

Saithe

The stock was assessed at a benchmark meeting at the beginning of 2024, resulting in an increase in the reference point for biomass and a reduction in fishing mortality. The two new reference points being used as a basis for the advice in the stock assessment, result in the catch advice for saithe in 2025 being for an increase of 7,1% to 79,071 tons. If this quantity is distributed between the two relevant management areas according to the traditional distribution key, **this will give a quota for the North Sea and Skagerrak of 71,639 tons, which EAPO supports.**

Whiting

The latest ICES assessment of stock status and the recommendation to increase the TAC to 237,008 tonnes, is not quota limiting. However, the predatory pressure that a colossal whiting stock is likely to exert on important species for human consumption such as cod and haddock is concerning.

The latest ICES assessment advise an 85% increase in catches compared to last year's recommendation, this will result in a 148% increase in TAC, as the TAC has been set at a lower level than the catch advice for 2024. This TAC was set at a level below the biological recommendation partly because it was feared that a large increase in whiting quotas would lead to an increase in cod catches. This may well be the case, but it doesn't seem rational, as a larger whiting stock is likely in a significant increase in natural cod mortality.

With ICES estimating a total catch of just over 30,000 tons in 2024, it is questionable whether a TAC of over 200,000 tons is appropriate. However, with reference to the above-mentioned concern about the consequences of the explosive development of the whiting population, **EAPO would like to ensure that a signal is sent that the stock should be contained. EAPO therefore recommends that the TAC for whiting in the North Sea be set at 237,008 tons, in accordance with the biological recommendation.**

Regarding the Skagerrak/Kattegat, EAPO stresses the 2025 ICES advice is neither coherent nor comprehensible in terms of the consequences of the advice issued in recent years.

In 2022, ICES delivered advice for 2023 and 2024 which, based on sporadic data from the fishery, recommending a quota reduction from 929 to 676 tons. This recommendation was not based on an observed decline in population size, the latter having almost doubled in the last two years, but on a precautionary multiplier whose origin is not entirely clear. Following a revision to the advice for 2024, the perception of the stock size in 2021 was changed and indicated to be much lower. This year, the advice for 2025 and 2026 is again providing a different perception of the stock development, raising doubts on the accuracy of the advice.

ICES mentions that the extent of exchanges with North Sea and Baltic Sea stocks is not known, but that this is a potential source of error. EAPO agrees with this observation and finds it difficult to accept the assessment that Skagerrak/Kattegat whiting is in almost constant decline, while North Sea whiting have increased by several hundred percent. This advice is further questionable given that whiting is mainly caught as a by-catch and that by-catches in the fishery have increased since 2021.

Fundamental changes are needed to the management of fisheries in the Skagerrak/Kattegat and the role of the quota for whiting. **EAPO therefore proposes either to base the whiting quota on the North Sea advice (and would currently suggests a quota of 676 tons plus 85%, corresponding to 1 251 tons), or to accept that there is not, or should not be, a credible basis for stock assessment and therefore not to set a quota for this fishery, which is primarily a by-catch fishery.**

Plaice

Despite a major discrepancy between fishermen's perception of the stock and the ICES advice showing the stock has changed significantly over the years, fishermen have noted an improvement in fishing in the Skagerrak within the past year. **EAPO recommends that a rollover of the quotas for plaice in the North Sea and Skagerrak in 2025, respectively 136,413 and 18,250 tons.**

Catches of plaice in the Kattegat do not show quite the same positive trends, development in the state of the stock as described by ICES. Although the industry doesn't fully agree with the ICES advice, it is agreed that in some parts of the area, the condition of plaice population seems worse than usual. While the underlying factors are not known, if it's a case of density-dependent reduced growth, it makes no sense to prevent the fishery from catching the volumes advised. The ICES recommendation for fisheries is not only based on the perception of the development of the stock, but also on the distribution of fisheries in the two relevant management areas, the Baltic Sea and the Kattegat.

For 2025, ICES recommends a plaice catches in the Kattegat of 5,286 tonnes, which is 40% more than the catch advice for 2024 (3,788 tons). As the quota for 2024 was set at 2,349 tonnes, the ICES advice suggests a quota increase of 125%. Even though the quota does not limit fishing in any way, **EAPO believes that a signal must be sent that the population should be limited. EAPO therefore recommends that the quota for plaice in the Kattegat in 2025 be set at 5,286 tonnes in accordance with the scientific advice.**

Sole

The industry notes with satisfaction that ICES has corrected last year's erroneous advice on sole in the North Sea. EAPO points out that the industry already noticed last year that the stock assessment from 2023 showed a completely wrong picture of the actual stock situation. At the benchmark in 2024, a new model was tested and approved, which significantly changed both the stock perception and advice. The advice shows firstly, how big a change in stock development the new model has given rise to and, secondly, it documents that the drastic reduction in TAC that was adopted for 2024 was not necessary with the knowledge we have today and could have been avoided if the opinion of fishermen had been considered.

Despite ICES advising a significant increase of 177% in a species where this may have a negative impact on the price, and despite the fact that recruitment does not appear to be sufficient to maintain the stock at current levels, **EAPO finds that the TAC for sole in the North Sea in 2025, in recognition of last year's failed recommendation, must be set to the 10,196 tonnes as advised by ICES.**

Although both stock assessment and management for sole in the Skagerrak and Kattegat are complicated by the fact that a significant proportion of the catches are taken in another management area, **EAPO recommends that the quota for sole in 2025, of 429 tonnes, be set in accordance with the biological advice from ICES.**

Turbot/brill and Lemon sole/witch

ICES has always produced individual stock assessments for each species. The TCA agreement between the UK and the EU on fisheries, has not affected the advice that underlies quota setting, despite several problems having arisen in relation to other legal agreements. The parties therefore continue to operate with a common quota for the part of the North Sea that lies in the EU and the UK's economic zones, only with a specification of how much of each species may be caught within the common quota. For the Skagerrak, quotas have been introduced for brill, lemon sole and witch in the EU part of the waters.

Turbot

ICES carry's out independent stock assessments for turbot in the North Sea and in the Skagerrak, but quotas are only set for the North Sea. Turbot caught in the Norwegian zone is not covered by the quota, which is agreed between UK and EU. **EAPO supports the ICES' advice for turbot in the North Sea, resulting in a recommendation of a TAC of 2,426 tonnes in 2025, which will give a quota to the EU and UK of 2,410 tons.**

Brill

The stock assessment for brill applies to the Skagerrak/Kattegat, the North Sea and the eastern English Channel. The sharing arrangement between the UK and the EU has been agreed for the three management areas, after deducting 0.55% for Norwegian catches. Therefore, 64.20% goes to the North Sea, 6.04% to the Skagerrak/Kattegat and the rest to the Channel. **EAPO recommends following the ICES advice for a TAC of 2,970 tonnes in 2025 will therefore give a quota of 1,896 tonnes in the North Sea and 178 tonnes in the Skagerrak/Kattegat.**

Lemon sole

The ICES stock assessment for lemon sole includes, as is the case with brill, several management areas. Fishing opportunities are distributed according to the following key: 0.72% is allocated to third countries and the remaining quantity is distributed with 83.38% to the North Sea, 9.1% to Skagerrak/Kattegat and 7.52% to the Channel.

ICES does not carry out an analytical stock assessment and advises on the basis of the observed stock development. In 2025 ICES advises catches of lemon sole in 2025 should not exceed 1450 tonnes, which is a reduction of 30% compared to 2024. The industry reports that in the Norwegian zone shows a similar perception of the stock as ICES, while fishing in the EU/UK area has improved reflecting greater abundance of lemon sole. **It is therefore extremely important that it is still possible to transfer fishing opportunities between management areas, for countries that have opportunities in both areas. EAPO recommends following the ICES advice, giving a TAC for the North Sea of 1200 tonnes and 131 tonnes for the Skagerrak/Kattegat.**

Witch

As with brill and lemon sole, ICES assess this as a single population that is managed in several different areas. The agreement between the EU and the UK allocates 6.21% to Norway and distributes the remaining amount between the North Sea and the Skagerrak/Kattegat with 55.6% to the North Sea and 44.4% to the Skagerrak/Kattegat. Although the ICES stock assessment includes parts of the Channel, no quantity is allocated to that area. **EAPO recommends following the ICES advice for a total catch of 1969 tonnes in 2025, giving a TAC of 1 027 tonnes in the North Sea and 820 tonnes in the Skagerrak/Kattegat.**

Megrim

After Brexit, the quota for megrim poses a serious choke problem for European fishermen, as was the case in 2021 when more than 90% of the quota was taken. ICES advice is a small reduction of 4.4%, and it is therefore important that the authorities continue to focus on swapping megrim.

Anglerfish

Following a benchmark, ICES has provided catch advice for 2025 based on an analytical stock assessment. The new ICES assessment confirms what the industry has long claimed: that the stock has grown steadily over many years. The overall population trend is positive and demonstrates that European fishermen have experienced difficulties in the Norwegian zone, where the quota for anglerfish has not reflected the stock development.

ICES recommends that catches can be increased by 211% in 2025 compared to 2024. An increase of 211% will be sufficient to compensate for the shortfall the industry has seen over several years and will prevent anglerfish from continuing to pose the choke risk experienced by fishermen this year. **EAPO recommends accepting the ICES advice and setting the TAC for anglerfish in the North Sea at 22,426 tonnes.**

Ling

The most recent ICES advice for ling was for 2024 and 2025. There is therefore no new advice for fishing 2025. However, EAPO maintains that the reduction of the TAC for the North Sea that was applied for 2024, was made on an erroneous basis.

ICES method for providing advice for data-poor stocks is highly controversial and this applies especially to species with a widespread distribution. For ling, where the stock assessment covers the north-east Atlantic and the Arctic Ocean and the stock assessment is based on catch rates from a longline fishery in a relatively limited area, there is good reason to take account of industry observations. Both in the Skagerrak and in the Norwegian part of the North Sea, European fishermen experience steady catches and this should translate into increased fishing opportunities. **Therefore, EAPO recommends the TAC for the North Sea should be increased to the level in 2023 of 2,577 tonnes. This would give a corresponding TAC for the Skagerrak of 148 tonnes, taking account of the latest stock assessment.**

Tusk

As is the case for the ling, ICES calculate a stock size index based on catch rates in Norwegian longline fisheries and provides biennial advice. For tusk, this resulted in a recommendation for a reduction in catches of 11.5% compared to 2023. **EAPO recommends a roll-over of the quota for 2024, corresponding to 208 tonnes.**

Widely distributed stocks

Hake IV, VI, VII and VIII

The assessment of the Northern Hake stock remains one of the most problematic for the EU fishing industry. EAPO members fail to understand how a stock that has been managed according to FMSY for years, with fishing mortality below FMSY, can be on such a downward trend. The proposed -28% TAC reduction compared to 2024 needs to be considered in light of the reductions observed in previous years. Put starkly, it would represent a reduction of almost half the fishing opportunities available in 2021. This is another stock for which the assessment does not correspond to the reality observed by fishermen.

As the biomass of this stock is considered by ICES to be above MSY B-trigger, **EAPO recommends in accordance with 4.5.c provision of the NWW MAP, to limit the TAC decrease to 20% in 2025.**

Concerning the North Sea and Skagerrak, the TAC for this area constitutes only a small part of the overall TAC for the stock. **EAPO recommends setting the TAC for hake in the North Sea and Skagerrak to 1,819 and 1,571 tonnes respectively.**

Seabass IVb–c, VIIa and VIId–h

Regarding seabass, EAPO expresses concerns regarding the SSB reference points determined during the 2019 benchmark, which rely mainly on the 2018 biomass level, which has never been updated. As the absolute biomass level could be adapted by including new data assessment afterward, regarding several cohorts forming the 2018 SSB.

However, it is even more surprising not to update the absolute value of the SSB reference points, as it is now being considered by ICES that the 2018 SSB is significantly lower than estimated in 2019 (7,962 tonnes), according to the 2024 Advice.

Therefore, EAPO wonders whether the biomass reference points should be modified to consider the latest estimation of 2018 biomass. Considering this, EAPO believes that it is necessary to consider whether it is appropriate to update the absolute Blim and MSY B-trigger values, and the management measures for 2025, to be fixed accordingly to the FMSY.

Cod VI – IV – III – VIId

EAPO based its recommendation on the revised ICES advice published *a posteriori* in November, which recommended a severe reduction of the catch advice, compared to the initial advice. As was the case last year, ICES has chosen to advise on the basis of a reduction in presumed mortality for the weakest Southern sub-stock. The same reduction is then applied to the assumed mortalities for the other two populations i.e., Northern and Viking. ICES bases the advice on an assumption that there are three distinct sub-stocks of cod in the North Sea and surrounding waters. The three subpopulations are supposed to be separate from each other during their spawning period, which is in the first quarter of the year. During the rest of the year, it is assumed that they mix in the entire area where cod is found. ICES has assumed that because there is no data on how the sub-stocks mix in the 2nd, 3rd and 4th quarter, it is assumed that they are mixed in all areas, in a ratio that reflects the number of the sub-

stocks. This assumption is controversial as it cannot be considered credible that a cod caught west of Scotland has the same probability of being a cod from the southern area.

Since the advice calls for a major reduction in fishing on stocks that are showing relatively strong growth, EAPO cannot accept the ICES advice for cod. Therefore, EAPO maintains that a rollover of the TAC in 2025 would not be detrimental given the continued increase in biomass in each of the three sub-stocks. **However, and taking into account management measures adopted in 2024, EAPO suggests setting the TAC following FMSY separately for the three sub-stocks. This would correspond to a reduction of 20% of the TAC compared to 2024 and the application of a further TAC constraint of 15% would deliver a TAC of 26,606 tons.**

Spurdog I-X, XII, XIV

EAPO members are in line with the ICES advice for spurdog in terms of catches and welcome the positive trend in the stock, leading to an increase of advised TAC for 2025 and 2026. However, **EAPO would like once again to remind that there is no justification for the maximum conservation reference size set at one meter and requests that this provision be removed as it limits the market opportunities for this species.**