

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: Ms Charlina Vitcheva, Director-General for Maritime Affairs and Fisheries
EU Council Secretariat

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EAPO position paper on South-Western Waters Stocks

General comments for South-Western Waters stocks

The Commission's state of play for 2025 shows once again the progress in achieving sustainable fishing in the EU. Since 2003, fishing mortality rates have fallen significantly in all areas, reaching their lowest levels in the Bay of Biscay and Iberian coastal zones. However, and in the event of no overfishing, the situation has changed radically since 2023. ICES annual advice on fishing opportunities now suggests a reduction in catches for many stocks in Southern Western Waters (sole, hake, pollack, Norway lobster, whiting, seabass). For around 8 out of 10 stocks in this area, recruitment is following a downward trend, a sign of deteriorating environmental conditions due, among other things, to climate change.

EAPO members call for an exhaustive analysis to assess the extent of climate change impacts, as well as anthropogenic impacts unrelated to fishing. The inclusion of those impacts would enable fishermen to gain greater visibility.

In these new environmental conditions, EAPO members are requesting that the adjustment of fishing opportunities according to the MSY approach take into account socio-economic balances and dependencies.

Stock-Specific Comments

Hake 8abde (Merluccius merluccius – HKE/8ABDE)

The position for the north hake for 2025 has been addressed in EAPO position paper on North-Western Waters and North Sea stocks¹: **EAPO recommends in accordance with 4.5.c provision of the NWW MAP, to limit the TAC decrease to 20% in 2025.**

Hake 8c 9a (Merluccius merluccius - HKE/8C3411)

After 20 years of application of a recovery plan, which has only resulted in a significant reduction in the fleet targeting this stock, and after the upward revision of the recommendations for this fishery in 2022, **EAPO proposes to follow the upper point of 20 404 tonnes** to maintain the most dependent fleets.

Sole 8ab (Solea Solea – SOL/8AB)

Concerning the stock of sole 8 ab, **EAPO suggests following the EC advice of setting the TAC at 2510 tons**, in line with the MSY advice and the MSY point value.

Sole 8c 9a (Solea spp – SOL/8CDE34)

EAPO would like to remind the importance of the sole 8c 9a high importance for EU fishermen. Once again, 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. The EU multiannual plan for stocks in the Western Waters was recommending setting a TAC at 209 tons for each of the years 2024 and 2025. In 2024 the agreed TAC was above this recommendation (652 tons) and such a low TAC would correspond to a loss of 68%. If EAPO wishes to align itself as closely as possible with the MAP and follow recommendations to increase the biomass of the stock in order to achieve a sustainable fishery in the long term, it seems difficult to accept such a reduction in catches in this context. **EAPO recommends applying a maximum reduction of 15%**

Megrim 8abde (Lepidorhombus - LEZ/8ABDE)

According to 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 would be set at 22 011 tons, according to the following distribution key: *Lepidorhombus whiffiagonis*, 21 144 tons and *Lepidorhombus bosci*, 867 tons.

Megrim 8c 9a (Lepidorhombus - LEZ/8C3411)

EAPO supports the proposal of the European Commission to set a 2025 TAC of 4 448 tons, corresponding to a 23% positive TAC change compared to 2024. This TAC is in line with the MSY advice for both species: *Lepidorhombus whiffiagonis*, 1 721 tons and *Lepidorhombus bosci*, 2 727 tons.

¹ <https://eapo.com/swfiles/files/download.php?myfile=eapo-position-paper-on-north-western-waters-and-north-sea-stocks.pdf>

Anglerfish 8abde (Lophiidae - ANF/8ABDE)

Concerning anglerfish species in 8abde, the TAC advice is requested to be set at 60 300 tons, slightly below the one of 2024, and distributed as 25 317 tons for black-bellied anglerfish and 34 983 tons for white anglerfish. **EAPO is in line with this ICES advice and suggests setting the TAC accordingly.**

Anglerfish 8c 9a (Lophiidae – ANF/8C3411)

The Commission proposes to set the TAC in line with the MSY advice and MSY point value for both species of anglerfish in 8c and 9a. The overall TAC change from 2024 is an increase of 17%, corresponding to a TAC to be set at 5 432 tons (2 486 for black-bellied anglerfish, 2 946 for white anglerfish). **The EAPO members are in line with this increase of 17%.**

Norway lobster 8ab – FU23-24 (Nephrops – NEP/8ABDE)

ICES advises the TAC to be set at 3 502 tons, according to the EU multiannual plan for Western Waters and adjacent waters. This corresponds to a negative 39,5% change compared to the TAC advised in 2024 (5 786 tons). Considering that the fishing pressure on the stock is considerably below FMSY and despite the fact that a MAP was set up in 2019, the MSY measure is not paying off.

Given the dependence of certain fleets on this stock, the EAPO recommends cutting the reduction in 2025. EAPO would also like to highlight and ask ICES to investigate, what are the other factors impacting directly the stock, in order to address them in the stock assessment.

Norway lobster 8c – FU31 (Nephrops – NEP/8CU31)

The Commission proposes to set the TAC in line with the MSY advice, resulting in a positive 134% TAC change from 2024. **EAPO is in line with this advice and supports the TAC to be set at 29 tons.**

Norway lobster 9a – FU28-29 and FU30 (Nephrops – NEP/9/3411)

For the Norway lobster in FU28-29 and FU30, the advice is to set the TAC at respectively 213 tons and 26 tons. **EAPO members are in line with such a roll-over overall TAC.**

Pollack 8 (Pollachius pollachius - POL/8ABDE)

Difficult negotiations between member states and European Commission have resulted in a definitive TAC for 2024 that is 35% lower than for 2023, with a share reserved for by-catch fishing. **The EAPO members do not consider it appropriate to revise the compromise established for 2024 and consider that, in order to maintain the socio-economic balance of the fleets, the TAC should not fall below 1,500 tonnes.**

Moreover, EAPO points out that:

- The ICES advice, published in 2023 and valid for 2024 and 2025, therefore does not take into account the additional management measures introduced during the year - namely an increase in the minimum catch size to 42 cm, and other restrictions applied to recreational fishing - and which the EC is proposing to extend to the whole of 2025;
- ICES describes its status as 'recoverable' and at no point does it state that there is an urgent need to let it recover with further measures;

- the level of fishing mortality is below the Fmsy proxy limit.

EAPO would like to see the ban on no-kill recreational fishing for this species extended at least to EU waters: the survival capacity of the individuals caught, which is reduced by nature (physiological fragility), is nil as soon as the depth of the fishing site reaches a few metres (pressure differential, swelling of the swim bladder, etc.).

Whiting 8 9a (Merlangius merlangus – WHG/08)

ICES has been providing a 1 347 tons MSY approach advice for each of the years 2024 and 2025 under the MAP, resulting in a roll-over TAC for next year. **EAPO would like to remind its last year position on the 41% decrease compared to 2023, and its rejection of the use of mean catches and the life history multiplier to determine fishing opportunities².**

Plaice 8 9a (Pleuronectes platessa – PLE/8/3411)

The advice for the 8 and 9a plaice stock is a roll-over of the 2024 TAC, at 124 tons. **Once again, EAPO wishes to address the issue of the automatic decrease in fishing opportunities due to the lack of data.**

Undulate ray 8 (Raja undulata – RJU/8-C, RJU/8-C.SEN)

Until 2024, ICES was recommending setting the TAC following its advice at the precautionary approach, *i.e.* 33 tons per year, since 2019. ICES is mentioning not being able to provide catch advice on the status of this stock because of lack of reliable survey and catch data, and states that there should be no targeted fisheries on this stock in each of the years 2025–2028. However, it seems counter-intuitive and unjustified, as the only data available is the landing volumes, increasing from year to year while the stock is not being targeted already. Hence, **EAPO supports the wish of ICES to set up a close monitoring of the stock and management implementation at the stock level.**

Moreover, and in this context, **EAPO strongly supports the allocation of additional fishing opportunities of 28,5 tons for France and 21,5 tons for Spain to vessels respectively participating in a sentinel fishery** to allow fisheries-based data collection for this stock.

Seabass 8ab

Despite there being no TAC for seabass in this area, ICES provides an advice with an advised total removal between 2 241 and 2 631 tonnes following the EU western waters Multi Annual Plan. Compared to 2023, the reduction of 22% of advice for seabass is to put into the global context of the Bay of Biscay.

For 2025, EAPO supports a roll-over for the following reasons:

- the level of fishing mortality is below MSY and close to its lowest level in the series
- the level of spawning biomass is at the sustainability threshold (very slightly lower) and its trend over the last 25 years is characteristic of a stock at MSY (slightly above or slightly below).

² <https://eapo.com/swfiles/files/download.php?myfile=EAPO23-65-EAPO-SWWWG-Position-paper-on-fishing-opportunities-for-2024.pdf>

Although this stock is not subject to a TAC, **EAPO would like to see any under-utilization of fishing opportunities in 2024 taken into account when setting those for 2025.**

In any case, EAPO considers that the change in the level of commercial fishing between 2024 and 2025 should be proportional to the change in the scientific recommendation of -0.4% over the same period.

EAPO members believe also that it is justified to set stricter compulsory management measures for recreational fisheries. **EAPO members are in line with the Commission's proposal to maintain the bag limit for recreational fisheries to 1 fish/day.**

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Esben Sverdrup-Jensen', with a stylized flourish at the end.

Esben Sverdrup-Jensen

President