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Date: 5 October 2018  
Our reference: 1819PAC04  
Subject: Consultation on TACs 2019

Dear Mr Aguiar Machado,

The Pelagic Advisory Council (PELAC) appreciates the opportunity to comment on the 'Communication from the Commission on the State of Play of the Common Fisheries Policy and Consultation on the Fishing Opportunities for 2019' and to provide recommendations on Total Allowable Catches (TACs) in 2019 for stocks under its remit.

### **Management strategies**

One of the key objectives of the PELAC is to develop management strategies for all the stocks under its remit and to follow these strategies subject to a positive evaluation by ICES. The 2019 TAC advice by the PELAC (see below) reflects this objective.

### **TAC proposals for 2019**

This section provides a detailed overview of TAC proposals for all stocks under the remit of the PELAC and has been unanimously endorsed by the Executive Committee.

### Blue whiting

The PELAC recommends following the ICES advice based on an agreed Long Term Management Strategy and setting the TAC at 1,143,629 tons in 2019.

The PELAC further encourages Coastal States to further explore the two-tier approach to fishing mortality as originally suggested in the multiannual management strategy developed by PELAC in 2012. The PELAC believes that working with different fishing mortality values at different SSB levels could be a key tool in securing long-term stability without sacrificing yield, provided that this approach is found to be precautionary by ICES and is in line with Common Fisheries Policy, Article 2.2.

The PELAC encourages further work on identifying methods to improve data and knowledge on stock recruitment – one of the key elements in the ICES stock advice.

The PELAC encourages the EU Commission and Member States to seek rapid agreement with all Coastal States on a sustainable long-term sharing arrangement for the stock. The current situation with no agreed sharing principles is not sustainable in the long-term.

### Atlanto-Scandian herring

In light of ICES having delayed Advice for 2019 until late 2018 the PELAC does not provide recommendations at the TAC level.

The PELAC encourages the EU Commission and Member States to seek rapid agreement with all Coastal States on a long-term sharing arrangement for the stock and a strategy for the exploitation of the stock, provided that they are found to be precautionary by ICES and in line with Common Fisheries Policy, Article 2.2.. The current situation with no agreed management principles is not sustainable in the long-term.

### North Sea horse mackerel

The PELAC recommends that the TAC is set at 17,517 tons in 2019 in line with the Precautionary Approach. This figures includes 2,338 tons based on discard estimates from the demersal sector which will come under the landing obligation by 2019.

The PELAC recommends that Member States and the EU-Commission conclude principle discussions on how to mitigate discards of pelagic species in demersal fisheries. The landing obligation will be fully implemented by January 2019 and sustainable solutions to minimize bycatches of pelagic species in the demersal sector must be developed and implemented.

The unexpectedly high discard rate of 13.35% estimated by ICES causes concern amongst members of the PELAC. Furthermore, there is significant discrepancy between discard data used by ICES and data used by STECF. The PELAC therefore further recommends that the discard data from the demersal fishery with be thoroughly analyzed.

### North Sea autumn spawning herring

North Sea autumn spawning herring is a key stock in EU fisheries and secures fishing opportunities for four different fisheries in the North and in IIIA. The PELAC finds that it is of utmost importance that ICES provides scientific advice on the basis of a Long Term Management Strategy.

The PELAC notes that there is currently no agreed Long Term Management Strategy in place to secure the foundation for a TAC advice for North Sea autumn spawning herring and secure an agreed distribution of fishing opportunities among fleet segments. The PELAC encourages the EU-Commission and Member States to, as quickly as possible and ahead of final negotiations on the TAC for 2019, finalize work on developing and analyzing the effects of a Long Term Management Strategy. This must be concluded ahead of the 2018 December Council meeting so that the TAC for 2019 can be set based on an agreed management strategy that is in accordance with the CFP and the latest scientific advice.

### 3A/ Western Baltic spring spawning herring

The PELAC recognizes that providing recommendations on the directed fishery for Western Baltic spring spawning herring falls under the remit of the BSAC. The PELAC, therefore, respects the recommendations and considerations provided by the BSAC on June 28<sup>th</sup>, 2018.

For 3A the PELAC recommends following the agreed EU and Norway TAC principles when setting a TAC. However, the TAC setting must take into account the development of an EU-Norway management strategy for North Sea autumn spawning herring as recommended by PELAC.

### Northeast Atlantic mackerel

The PELAC requests that the inclusion and influence of RFID tagging data used in the North East Atlantic mackerel assessment, as well as other data and considerations, be reviewed as a matter of urgency at an Inter-Benchmark meeting.

All the Industry stakeholders in the PELAC have voiced a strong opinion on and their lack of confidence in the assessment and advice provided for this stock.

The PELAC requests that Coastal States ask ICES to re-evaluate the mackerel assessment and that once this re-evaluation is completed the TAC is set in accordance with the Three Parties Management Strategy as set out in the *Agreed Record of conclusions of fisheries consultations between Norway, the European Union and the Faroe Islands on the management of mackerel in the Northeast Atlantic for 2018*, done in London, 11 October 2017.

The PELAC alerts the Commission and the Coastal States to the fact that the scientific advice for this stock has been considerably exceeded in recent years. If this practice continues, it is unlikely that the downward trajectory for the stock will be reversed.

The PELAC supports the mackerel egg survey in 2019 and seeks the inclusion of the North Sea within the international egg survey scheduled for 2019.

### Western horse mackerel

The PELAC recommends following the ICES MSY advice and to set the TAC in 2019 at 145,237 tons.

In addition, the development of a new Long Term Management Strategy, aided by genetic stock identification work, must be continued.

Again, industry stakeholders noted a lack of confidence in the assessment and advice provided for this species.

An Inter-Benchmark is requested for early 2019.

### Southern horse mackerel

The PELAC recommends following the agreed and evaluated by ICES management strategy for *Trachurus trachurus* and to set the TAC in 2019 at 46,368 tons. Furthermore it seeks clarification from the EU-Commission on why it requested ICES to use the MSY advice for this species.

Considering Southern horse mackerel advice for 2019, the PELAC recommends that the Council and the Commission take steps to separate the management of the three species currently under combined TAC for southern horse mackerel. This is in light of the ICES view that the combined TAC prevents effective control of single-species exploitation rates and could lead to overexploitation of any of the species.

### Boarfish

The PELAC recommends following the ICES advice based on the precautionary approach and to set the TAC in 2019 at 21,830 tons. Furthermore, the PELAC seeks clarification from Commission on why the TAC in 2018 was set at 20,380 tons – 1,450 tons below the advice.

The work on developing an analytical assessment has to be continued.

The PELAC requests to include the boarfish closures as contained in the PELAC Management Strategy for this species in the NWW discards plans.

### Herring in ICES area 6a and 7b,c

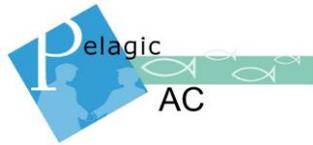
The PELAC recommends an immediate evaluation of the revised re-building plan for herring in 6a and 7b,c submitted by the PELAC. The scientific monitoring TAC should be continued in 2019 and be set in accordance with the revised re-building plan submitted by the PELAC, provided that it is found to be precautionary by ICES and is in line with Common Fisheries Policy, Article 2.2..

Having a monitoring TAC in 2019 is essential to continue the industry surveys as well as the genetic stock identification study. Once additional scientific information is available a benchmark must be carried out aiming at having separate stock assessments again.

### Celtic Sea herring

The PELAC recommends following the ICES MSY advice with the 2019 TAC set at 4,742 tons. The PELAC is actively working on a rebuilding plan which it hopes to finalise in early 2019.

Furthermore, the mixing issue with Irish Sea herring needs to be addressed.



Irish Sea herring

The PELAC recommends following the ICES MSY advice and to set the TAC in 2019 at 6,896 tons.

In case you have any questions, please do not hesitate to contact the Secretariat.

Kind regards,

A handwritten signature in blue ink that reads "Jesper Raakjær".

Jesper Raakjær  
Chairman Pelagic AC