



THE
PEW
CHARITABLE TRUSTS

POSITION PAPER ON EUROPEAN COMMISSION PROPOSAL FOR TACs IN EUROPE'S NORTH-WESTERN WATERS

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1. Background

A new Common Fisheries Policy (CFP) entered into force on January 1 2014 and includes a requirement to end overfishing, with legally binding targets and deadlines. In Article 2.2 it specifies that:

“in order to achieve the objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing the maximum sustainable yield, the maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and, on a progressive, incremental basis at the latest by 2020 for all stocks”.

At its December meeting, the Fisheries Council will decide total allowable catches (TACs) for most fish stocks for 2015. In line with the new CFP, ministers responsible for fisheries must agree, in most cases, to TACs that will end overfishing in 2015. The legislation stipulates that any deferral of this deadline is acceptable only in exceptional cases in which meeting it “would seriously jeopardise the social and economic sustainability of particular fleets” (Preamble 7).

2. European Commission proposal

In its proposal, the European Commission has suggested TACs for a number of stocks that are not subject to negotiation with third parties or awaiting further scientific advice.¹ Fifty-four of these TACs are in the north-western waters². For a large number, the Commission follows scientific advice. This includes TACs for northern hake and a number of plaice, sole and herring stocks. Yet, in several cases the Commission has proposed fishing limits that exceed the scientific advice, without providing evidence that ending overfishing in 2015 would seriously jeopardise the social and economic sustainability of the fleets involved. This includes TACs for several cod, whiting and sole stocks. For some TACs, the difference between the scientific advice and the proposed fishing limit is significant, and the level of overfishing is high. The Commission also proposes new measures to reduce overfishing of sea bass, including a bag limit for recreational fisheries, and limits on effort and the monthly catch for commercial vessels.

¹ http://ec.europa.eu/fisheries/cfp/fishing_rules/tacs/info/com_2014_670_en.pdf
<http://ec.europa.eu/transparency/regdoc/rep/1/2014/EN/1-2014-670-EN-F1-1-ANNEX-2.Pdf>

² Atlantic Ocean west of Scotland and Ireland, and adjacent waters including the Irish, Celtic and North seas.

3. Pew position on the proposed TACs

The TACs proposed for fish stocks west of Scotland and Ireland, and in the Irish, Celtic and North seas, mainly fall into two categories:

- A. Twenty-one TACs that do not exceed the scientific advice. For these Pew asks fisheries ministers to accept the TACs proposed by the Commission. These include:
- 18 TACs (for 17 stocks) that match scientific advice exactly - boarfish, west of Scotland herring, herring (in ICES Area VIa south/VIIbc), Irish Sea herring, west of Scotland cod, Celtic Sea haddock, 3 TACs for northern hake, Norway lobster (IIIa), plaice (VIIfg), plaice (VIIhjk), plaice (1 TAC for VIIe & VIId), sole (VIIe), sole (VIId), sole (IV), sole (IIIa), and sole (VIIfg).
 - Celtic Sea herring and west of Scotland haddock, where the proposal is marginally higher and smaller than the advice, respectively, for technical reasons.
 - Celtic sea cod, where the proposed TAC is lower than advice to reflect mixed fisheries.
- B. Twenty-one TACs that exceed scientific advice. For these, Pew urges fisheries ministers to decrease fishing limits so they do not exceed the scientific advice, including for TACs subject to previous agreements. This is particularly important when biomass is assessed as being depleted, either below levels that are considered precautionary, or below levels at which reproduction of the stock is impaired.

Pew would like to stress the importance of not exceeding scientific advice for the following:

- Instances in which TAC greater than zero have been proposed despite the advice for no fishing because biomass is assessed as depleted to the point that reproduction of the stock is impaired. This is the case for Irish Sea cod, Irish Sea sole, Kattegat cod, and three TACs subject to the 2013 Council/Commission agreement on stocks “with a presumption of stability”³ –Irish Sea whiting and blue ling (III and II & IV).
- TACs where the reduction proposed is smaller than advised. For instance, 20 percent TAC reductions are proposed for Irish Sea haddock and Irish Sea plaice, despite advice to cut TACs by 70 percent and 68 percent, respectively. This also includes TACs such as whiting (VI), 2 TACs for Pollack (Vb, VI, XII & XIV and VII) and 2 TACs for greater silver smelt (III & IV and V, VI, VII).
- TACs for which a “rollover” is proposed (maintaining the same fishing pressure), despite advice to reduce catches. These include TACs subject to the 2013 Council/Commission agreement such as lemon sole & witch sole (VIIhjk), cod (VIb), plaice (VIIbc), sole (VIIbc), and sprat (VIIde).
- TACs that remain on a combined species basis despite advice to separate the species and reduce catches. For example the TAC for dab & flounder and one for turbot & brill. In these cases Pew asks for separate TACs for each species in addition to reductions in catch.

4. Pew recommendations to fisheries ministers

We call on EU ministers responsible for fisheries management to match the ambition they demonstrated in the reform of the CFP and set catch limits that will end overfishing in 2015, as required by the legislation.

³ Commission and Council agreed in December 2013 on the desirability of maintaining TACs unchanged for the following 25 stocks unless scientific advice indicates a need for change: Blue Ling (EU and international waters of II and IV), Blue Ling (EU and international waters of III), Cod (VIb (Rockall subunit)), Common sole (VI, Vb, international waters of XII and XIV), Common sole (VIIbc), Common Sole (VIIhjk), Herring (VIIef), Greater silver smelt (EU and international waters of I and II), Greater silver smelt (EU and international waters of III and IV), Ling (EU and international waters of I and II), Ling (IIIa), Ling (EU and international waters of V), Plaice (Vb(EU waters), VI, XII, XIV), Plaice (VIIbc), Plaice (VIIhjk), Plaice (VIII, IX, X and CECAF 34.1.1), Pollack (Vb(EU waters), VI, XII and XIV), Pollack (VIIIc), Pollack (IX, X, CECAF 34.1.1 (EU)), Saithe (VII, VIII, IX, X, CECAF 34.1.1 (EC)), Sole (VIIIcde, IX, X, CECAF (EU)), Sprat (VIIde), Whiting (VIIa), Tusk (IIIa and EU 22-23), Tusk (EC I, II, XIV), Tusk (EC waters of IV)

The longer ministers yield to short-term interest and delay an end to overfishing, the greater the loss to communities that are dependent on these fisheries and to the marine environment in the long term. Specifically, this means ministers must:

- Follow the CFP objectives of ending overfishing by 2015 and provide evidence to justify any delays;
- Support TACs that do not exceed scientific advice;
- Set TACs even lower than scientific advice where necessary to account for mixed fishery interactions, for example, in the Irish Sea and Celtic Sea;
- Agree to measures such as greater gear selectivity to reduce bycatch in mixed fisheries for stocks not yet subject to the Landing Obligation; and
- Support measures to reduce sea bass fishing mortality, through catch limits for commercial and recreational fisheries.