

The North Sea Advisory Council

NSAC Secretariat
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The Netherlands



Mr Bernhard Friess, Director-General
Directorate General Maritime Affairs and Fisheries
Rue de la Loi 200
1049 Brussels
Belgium

Cc: - Member State Members of the Scheveningen Group
- PECH Committee

18 December 2019

Subject: North Sea Cod - Preparation of NSAC Advice

Dear Director-General Friess,

Since we received ICES advice in June, the NSAC has been engaged in internal discussions on how best to frame our own advice on how to address the dramatic downward turn in the fortunes of North Sea cod. NSAC advice contributed to the design of measures which successfully rebuilt the North Sea stocks between 2000 and 2015 and so it is desperately disappointing that a combination of ecosystem and anthropogenic changes appears to have reversed the positive trends on fishing mortality and spawning stock biomass.

The situation is far from straightforward. A complex of intertwined factors appear to be at work. Briefly, these include:

- The northward shift in the distribution of the cod stocks;

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- The implementation of management changes stemming from the reform of the CFP in 2013, including the EU landings obligation, carrying with it the potential to choke mixed fisheries;
- Low recruitment;
- Unaccounted mortality and other factors which introduce uncertainty into the stock assessments;
- Various fleet adaptations which have developed in response to economic and management drivers;

If there was a simple solution, we would, of course, have been pleased to inform you of it in this advisory letter. The truth is that there appears to be no simple or easy solution. This suggests that the path forward lies in strenuous efforts to understand what is happening to the stock and how best to frame an effective management response.

Fisheries managers in the Commission, Norway and the member states have the unenviable task of defining an immediate management reaction to ICES advice for a 70% (subsequently reduced to 61%) reduction in the TAC for North Sea cod. A reduction of this size carries with it a certainty of chokes in the other stocks caught in the North Sea demersal fisheries. The discussions between EU and Norway is therefore understandably focussed on an appropriate TAC and accompanying measures which effectively reduces fishing mortality on cod, whilst reducing the risk of choke and maintaining the fabric of the fishing industry.

Whatever the shape of the EU/Norway fisheries agreement for 2020, there will remain a need to understand the factors at work and to define an ambitious but realistic harvesting strategy for cod in the North Sea for the years ahead. This is where the NSAC feels that it has an important role to play and why it has formed a working group to prepare advice which we hope will be completed in the first half of 2020.

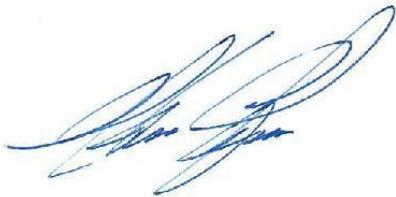
We intend to work in an open and transparent manner and welcome the fruitful cross-fertilisation that usually accompanies collaboration between fisheries administrators, fisheries scientists and fisheries stakeholders.

Minority position:

The Dutch Elasmobranch Society, North Sea Foundation, ClientEarth and WWF-EPO disagree with the representation of the reasons for the lack of timely NSAC advice on the North Sea cod situation as presented in this letter. Regrettably no tangible efforts were made on drafting advice on cod until the end of November by which time it was too late to present to the EU before the bilateral negotiations with Norway. Even though it was clear well before the ICES advice came out in June that the North Sea cod population would need stringent measures to help it recover, a majority of AC members did not see the NSAC as the appropriate forum for the necessary discussions on how to address the situation, blocking the NSAC from taking the steps needed for drafting advice.

We hope that you find this letter updating you on how the NSAC intends to proceed, helpful. We welcome any guidance which you may wish to offer on the contents of this letter.

Kind regards,



Kenn Skau Fischer
Chairman of the North Sea Advisory Council