

Ms Charlina Vitcheva  
Director-General  
Directorate-General for Maritime Affairs and Fisheries  
European Commission  
1049 Brussel  
Belgium

Dun Laoghaire/Zoetermeer, 09 December 2020  
NSAC Ref. No.: 04-2021

Dear Ms Vitcheva,

**Re: NWWAC & NSAC advice on the Fishing Opportunities 2021 for undulate ray in the English Channel (ICES 7d, e)**

Further to the NWWAC advice in response to the consultation on Fishing Opportunities 2021 submitted on 18 September 2020, the members of the NWWAC and NSAC discussed the ICES advice on undulate ray in the English Channel, published in October, during the meeting of the joint Focus Group Skates & Rays on 16 November.

The Advisory Councils wish to emphasise that due to the dedicated involvement of fishers in data collection for more than 10 years, undulate ray is currently one of the most documented ray stocks in the ICES advice. The last ICES advice indicates that the total catches, including discards, of undulate ray in the Channel are approx. 2552t. Furthermore, the biomass index shows an exponential increase as it has been multiplied by 20 since 2008 (Annex 1). These estimates confirm fishers' observation at sea. Nevertheless, fishing opportunities are not following these tendencies (Annex 2) and are currently set at a level inconsistent with the stock abundance, thus creating high rates of discards considering undulate ray is a bycatch species.

Furthermore, the fishing industry members of the ACs would like to query the basis of the ICES advice which recommends that no more than 183t should be landed for 2021 and 2022, as this implies a 22% reduction of the current TAC (234t). The method used by ICES seems to be inappropriate for the special case of undulate ray which was unjustifiably prohibited by the European Commission in 2009. This advice is creating lot of questions and increases fishers' exasperation after more than 10 years of discussion and collaboration on undulate ray. This may impact motivation for fishermen to cooperate with scientists.

Recognising this, the industry representatives of the NWWAC and NSAC are asking for the adequate setting of the TAC for undulate ray for 2021 in accordance with the stock abundance, meaning a minimum of 500t. This volume corresponds to the historic estimate of landings before the prohibition and takes into consideration that the biomass ratio index (2.7) applied to the current TAC will correspond to a TAC of 632t. Furthermore, it will represent only 20% on the current catches.

The OIGs of the North Sea Advisory Council support the ICES advice for undulate ray for 2021-2022. They do note that this is an important subject that warrants further discussion with both the



Commission and ICES in the near future. The OIGs welcome ICES scientists' participation in future FG meetings.

We thank you for your attention on this matter and for taking on board the finding of the AC members. We urge the Commission to address this longstanding issue and welcome a direct dialogue with the relevant parties.

Yours sincerely,



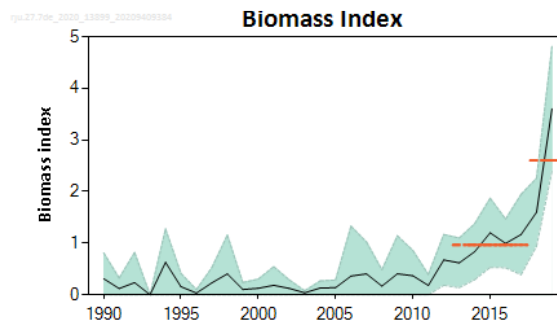
Emiel Brouckaert  
Chair NWWAC Executive Committee



Kenn Skau Fischer  
Chair NSAC Executive Committee

## Annex 1

Swept-area biomass (thousand tonnes) indicator from the CGFS-Q4 survey with 95% confidence intervals. Horizontal lines show the mean biomass indicators for 2013–2017 and 2018–2019.



ICES advice on fishing opportunities, catch and effort, Celtic Seas Ecoregion, published 02 October 2020 ([link](#))

## Annex 2

Overview of ICES predicted landings corresponding to advice, available TAC, variation of fishing opportunities and ICES index ratio of biomass in ICES areas 7d and 7e between 2015 and 2020

Year	ICES predicted landings corresponding to advice	VIIId TAC (tonnes)	VIIe TAC (tonnes)	Total VIIId,e TAC (tonnes)	Variation of fishing opportunities	ICES index ratio of biomass
2015	0	11	100	111		
2016	0	12	100	112	1%	2.87
2017	≤ 65	19	161	180	+ 61%	
2018	≤ 115	19	161	180	0%	1.58
2019	≤ 115	TAC		234	+ 30%	
2020	≤ 115	TAC		234	0%	2.70