

Ms. Charlina Vitcheva
Director-General for
Maritime Affairs and Fisheries (MARE)
European Commission
Rue Josef II 99
1000 Brussels
Belgium

Dun Laoghaire, Zoetermeer, 18 December 2020
NSAC Ref. No.: 06-2021

Dear Ms Vitcheva,

Subject: Non-recurrent request to ICES on criteria for listing on Prohibited Species List

The NSAC thanks you for your response to their letter on the prohibited species list from 01 October of this year. It is encouraging that the Commission shares the concern on the use of this list and welcomes the opportunity to continue the conversation on this topic.

In March of this year, the NWWAC and NSAC established a joint Focus Group on Skates and Rays to develop further advice regarding the management of these species. Members of this group reviewed your letter and have taken note of your point regarding the value of sound scientific underpinning any proposal to request protective measures for sensitive species caught in fisheries. They also agree that Member States have an important role in collecting data on this.

However, for both Advisory Councils the main concern regarding the prohibited species list remains. This was identified by the NSAC in their original letter on this subject from 2017 and relates to the fact that there are currently no criteria or guidelines for listing species on the prohibited species list, nor are there conditions that would allow for subsequent removal if populations were rebuilt.

Therefore, the NWWAC and the NSAC advise that a non-recurrent request be sent to ICES asking for the establishment of clear guidance for listing species on the prohibited species list which consists of independently verifiable criteria.

By making the process of how species are included as well as removed from the prohibited species list as transparent as possible, we sincerely hope that the list can serve its intended purpose of ensuring the most vulnerable fish species are protected, whilst at the same time allowing sustainable fishing operations to continue.

Yours sincerely,



Emiel Brouckaert
Chairman
NWWAC Executive Committee



Kenn Skau Fisher
Chairman
NSAC Executive Committee



Co-Funded by the
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