

Scheveningen Group Presidency
Swedish Agency for Marine and Water Management
Gullbergs Strandgata 15
411 04 Gotenburg
Sweden

Cc: DG MARE

Brussels, 20 March 2024

NSAC Advice Ref. 04-2324
NSAC Advice on the Scheveningen Group JR concerning the
suspension of the sprat box

This paper was approved with consensus by the NSAC Executive Committee on 18 March 2024 via fast-track written procedure.

On the 22nd of February 2024, the Scheveningen Group of the North Sea Member States approached the North Sea Advisory Council (NSAC) with a request to provide comments to the Joint Recommendation (JR) concerning the current suspension of the sprat box.

The deadline for provision of comments was extremely narrow as the NSAC was asked to provide comments by 13:00 CET on Monday 26th of February 2024. This deadline does not correspond to the NSAC internal procedures even when the minimum consultation period is applied.

The NSAC has in the past provided advice¹ supporting the suspension of the sprat box, as it was found to have no effect on the fish stocks and should have been cancelled with the recent revision of the Technical Measures Regulation. The position stated in the previous advice is maintained for the current JR.

Nevertheless, the NSAC would like to draw attention to the ecosystem role of sprat. The importance of sprat species as a forage fish and thus as a key element of the North Sea ecosystem is well recognized. In ICES Ecosystem Overview on Greater North Sea ecoregion published on 15 December 2022 we can read that: "The commercial fish species are connected through predator–prey relationships. In the ecoregion, the main forage fish (herring, sandeel, sprat, and Norway pout) are an important food source in the North Sea foodweb." In addition, there is documented evidence of dependencies of North Sea top predators on forage fish, including on sprat which is an important prey for seabirds (e.g. Sandwich tern, Razorbill,

¹ <https://www.nsrac.org/wp-content/uploads/2020/06/2-1617-20161201-NSAC-Response-to-Sprat-Box-JRec1.pdf>

Guillemot) and predatory fish (e.g. horse mackerel, whiting).² The ecological role of forage fish, such as sprat, calls for enhanced protection as well as cautious, responsible and ecosystem-based fisheries management of these species. The NSAC acknowledges scientific evidence confirming that the suspension of the “sprat box” has no harmful impact on the herring stock. However, NSAC is aware that the advice from ICES takes this into account and supports a continuation of focus on the ecological role of sprat in maintaining the health of the ecosystem and food webs in the North Sea, including the impact of the closure on predatory species populations.

We hereby thank the Scheveningen Group for granting us the opportunity to provide input on the proposed draft Joint Recommendation. Should any further clarifications be necessary, we invite the Presidency to reach out.

² Engelhard, G. H., Peck, M. A., Rindorf, A., C. Smout, S., van Deurs, M., Raab, K., ... & Dickey-Collas, M. (2014). Forage fish, their fisheries, and their predators: who drives whom? ICES Journal of Marine Science, 71(1), 90-104