

Ms Charlina Vitcheva
Director-General for Maritime Affairs and Fisheries
European Commission
Jozef II-straat 99
1000 Brussels
Belgium

Dun Laoghaire, 03 April 2024

Dear Ms Vitcheva,

Subject: NWWAC/NSAC letter on the TAC setting for skates and rays

Continuing their work following the joint NWWAC/NSAC workshop on skates & rays management ([link](#)) in February 2023, which resulted in joint advice submitted in May 2023¹, members of the joint Focus Group have focused their attention on the difficulties related to the group TAC setting approach covering multiple commercially important species in the North Western Waters and the North Sea.

A previous request for an evaluation of possible management approaches and changes to TAC calculation was made to STECF in 2015 (STECF 15-01) and also discussed during the 2017 workshop organised by DG MARE.

In their 2023 advice, the North Western Waters and North Sea ACs recommended (among others):

- A single TAC could be established for North Sea and English Channel (7d) thornback ray and NWW cuckoo ray since they are both category 2 stocks. However, it is important to avoid choke situations arising and the ACs recommend that trials are carried out to ensure that this does not have a negative effect on the fishing opportunities for the single TAC species, as well as the other ray species that are still in the group TAC. Stochastic surplus Production models in Continuous-Time (SPiCTS) should be embedded to arrive at meaningful advice. Consideration should be given to the development of a solution to the issues which will arise if the TAC setting key is applied to individual stocks by area.
- Flexibility should be included in legislation so that fishermen and scientists could work together for trials (fishing for science) and provide for example a scientific/best practice exemption in order to facilitate fishermen working with institutes and researchers. This must be supported by fisheries control.

Following this advice, the Advisory Councils were pleased to note the harmonisation of TAC setting between the EU and the UK with the method developed by the UK now jointly being applied.

¹ NWWAC/NSAC advice on skates & rays management ([link](#))



Further discussions were held during two Focus Group meetings with the support of the International Council for the Exploration of the Sea (ICES) and DG MARE representatives, during which members reviewed the latest ICES advice on selected elasmobranch stocks as well as the changes to advice setting over the past years.

Members expressed their concern about the application of the same rule to arrive at management for various stocks as life histories between elasmobranch species can differ greatly making a one-size-fits-all approach unsuitable. Attention must be paid to potential unintended consequences when investigating the removal of individual species from the group TAC to avoid an increase in choke situations linked to individual TACs.

The North Western Waters and North Sea AC recommend:

- Holding an STECF EWG to focus on simulation of consequences related to changes in TAC setting and management including issues related to the use of the relative stability allocation key, and specifically the removal of individual commercially important or vulnerable species from the group TAC
- Improving discard data for all stocks.
- Trials or assessments to support the survivability exemptions for the main commercial species.
- Evaluation of management opportunities outside the TAC system and identification of alternative new options
- More funding should be made available for research on these highly complex issues, in particular for the main commercially fished stocks and the most vulnerable stocks.

The ACs caution against a rushed approach to the implementation of any changes regarding the management of skates and rays and emphasise the importance of stakeholder involvement at all levels of discussion regarding potential changes. Members stand ready to continue their involvement with and contribution to the work of the European Commission and thank DG MARE for their continued efforts regarding the management of these species.

Thank you for your attention on this matter, we look forward to your feedback.

Yours sincerely,



Emiel Brouckaert
NWWAC Chair



Kenn Skau Fischer
NSAC Chair



Co-Funded by the
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