

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

Cc: North Sea Member States

Brussels, 10 October 2024

Advice Ref. 14-2324 **NSAC Advice on 2025 Fishing Opportunities**

This paper was approved by the NSAC Executive Committee on 10 October 2024 via the written procedure.

1 Background

On the 7th of June, the Commission released its Communication on the State of Play and Orientations for 2025¹. This report provides information on the status of European fisheries as monitored in 2023 and includes proposals and consultations with third countries regarding fishing opportunities (FOs) for 2025. The Commission highlights a significant improvement since 2003, noting that far fewer fish stocks are currently overfished. Furthermore, fishers are experiencing socioeconomic benefits from stocks that have been managed sustainably for some time.

The Communication, published annually, aims to enhance the resilience of fishers, boost the recovery of fish stocks towards to maximum sustainable yield (MSY) levels, and maintain these stocks at MSY level¹. In view of this, the Communication reviews progress towards sustainable fishing practices within the EU, evaluates the balance between fishing capacity and fishing opportunities, assess the socio-economic performance of the sector, and monitors the implementation of the landing obligation.²

In the North East Atlantic fish stock are generally within the range consistent with policy objectives for fishing mortality rates, showing notable progress on reaching sustainability in 2023. Specifically, while the average fishing mortality rate was 53% above F_{MSY} targets in 2003, recent assessments indicate a significant improvement, with the rate 42% below F_{MSY} in 2022.¹

¹ https://oceans-and-fisheries.ec.europa.eu/publications/sustainable-fishing-eu-state-play-and-orientations-2025_en

² https://ec.europa.eu/commission/presscorner/detail/en/IP_23_3283

This NSAC advice seeks to address the Communication by reflecting on the 2025 ICES Advice for the North Sea and the Skagerrak and Kattegat, which was presented to the NSAC Joint Demersal & Skagerrak and Kattegat Working Group on July 9, 2024.

2 NSAC Advice

2.1 General observations

Overall, scientific advice for the North Sea and the Skagerrak and Kattegat indicates an upward trend for most stocks. Enhanced stakeholder engagement throughout almost all stages of advice production has led to better consideration of observations and feedback from stakeholders. Recognizing that science is not exact and serves as an input into policy-making by providing a range of options and methods based on the best available science, NSAC members advocate for careful consideration of the methodologies used to perform assessments and define advice.

Assessments should be conducted consistently and comprehensively, and the management measures advised should accurately reflect, to the degree possible, natural conditions. Additionally, headline advice often appears to be the only option followed by managers. Therefore, we urge managers to consider the full advice supplied by ICES, including alternative catch options, to ensure a fair evaluation of all possibilities when setting fishing opportunities. Stakeholder involvement in advice request formulation would significantly enhance the final advice, as it is shaped by the assumptions underlying the requests.

NSAC also calls for greater inclusion of ecosystem considerations. Many stocks are currently affected by climate change, leading to phenomena such as fish migration from traditional catching areas. In this context, stakeholder field knowledge is essential to incorporate these considerations promptly. We encourage increased collaboration between science and industry, such as parallel commercial surveys or year-round monitoring, to mitigate large variations in advice, which create unpredictability for the industry.

ICES benchmarks should also investigate other factors impacting fish populations, such as cormorants, seals, starvation, and interspecific competition, in addition to fishing. Overall, integrating socio-economic aspects within an ecosystem-based management (EBM) framework with a longer-term perspective than the current annual framework would better reflect the reality of fisheries and provide greater stability than annual single-species advice allows. We urge managers to prepare their services to embrace EBFM and manage fisheries with a longer-term outlook.

The NSAC recommends the Commission to consider these general observations and the specific stock observations below into account when holding bi- and trilateral consultations with Norway and the UK

2.2 Specific stock observations and advice

Cod (Kattegat)

The precautionary approach (PA) advises zero catch for this stock in 2025 and 2026, as the SSB remains low. After relatively high recruitment in 2023, the 2024 recruitment is quite low, and catches are nearly zero. Relative mortality is uncertain and includes total fishing mortality and unaccounted losses such as migration or natural mortality. ICES cannot assess the stock relative to MSY and PA reference points as these are not defined.

NSAC members raised concerns about the relevance of the zero-catch advice for Kattegat cod, arguing that it suggests active fishing despite minimal catches over the past two decades and uncertainties regarding migration from other regions. Given the lack of improvement in stock numbers despite no fishing for 20 years, an evaluation of the likelihood of Kattegat cod stock recovery was suggested. The industry believes that all cod in the Kattegat have migrated from other areas, implying there is no local stock.

In addition to considering migration, members emphasize the need to account for predation by cormorants and seals as factors impacting mortality.

Cod (North Sea, West of Scotland, eastern English Channel, and Skagerrak)

In 2023, a benchmark was conducted for North Sea cod, merging it with West of Scotland cod to form the Northern Shelf Cod, which is divided into three subcomponents: Southern stock, Viking stock, and Northwestern stock. The model assumes that in Q1, the three subcomponents are separate, but they fully mix for the rest of the year. Overall, catches have been low since the 2000s, especially in the last four years, with a slight increase in 2023. To protect the weakest component (southern), applying precautionary considerations led to applying the same common reduction in fishing mortality to all three sub stocks. This resulted in catch advice of 3,074 tonnes for the Southern stock (22% decrease), 4,089 tonnes for the Viking component (22% decrease), and 12,158 tonnes for the Northwestern stock (10.1% decrease), totaling 19,321 tonnes for all three components for 2025.

The industry expressed concerns about the use of an "ad-hoc" precautionary approach and an unrealistic reference point for the Southern component, not taking into account the possibility that climate change prevents the stock from growing to that order of magnitude, leading to a 40% TAC reduction and adversely affects the fishery on three stocks which, according to ICES assessment, all show growth during 2024.

Evidence was presented suggesting minimal mixing between Southern and other North Sea cod stocks, challenging the assumption of full stock mixing. It was emphasized that TAC reductions for northern stocks should not be influenced by Southern stock issues, and alternative solutions were called for. Consequently, clearer communication from ICES regarding alternative catch options beyond the headline advice was proposed.

Additionally, the need to incorporate climate impacts on cod population migration in ICES advice was highlighted.

Until this happens, based on ICES estimate of roughly 20% increase for each of the three sub stocks, the **NSAC industry** suggest to take a precautionary approach and only increase the TAC by half the observed growth in the sub stocks, which would be an increase in TAC by 10%.

Conversely, the **NSAC OIGs** support the scientific advice and, as such, deviate from industry's position.

Lemon sole (Subarea 4 and divisions 3.a and 7.d)

Catches of this stock have decreased. Fishing pressure is below the F_{MSY} proxy, but has risen recently. SSB has been declining since 2017 and is near the $B_{trigger}$ value. The constant harvest rate method was used, applying the stability clause. The headline advice is a catch of 1,450 tonnes, a 30% reduction from previous advice.

While it is acknowledged that the 30% decrease in the assessment for lemon sole in subarea 4 and divisions 3a and 7d is linked to a decreasing pattern in the biomass index, this is in contradiction with what is experienced at sea by fishers. This stock is an example of where more and better consideration of fishers' experience would lead to an assessment that is closer to reality.

Northern Shrimp (Skagerrak and Kattegat and northern North Sea)

A special assessment using three models with varying natural mortalities was conducted for this stock. A calendar change in 2023 altered stock perceptions due to maturity/hermaphroditism changes. Despite significant recruitment in 2020, 2022 estimates are the lowest on record. Catches have been declining since 2014, with fishing mortality nearing F_{MSY} . SSB saw a steep increase from 2023 to 2024 but remains near B_{lim} . Catch advice has decreased by 11% to 4,557 tonnes, driven by historically low 2022 recruitment estimates and a downward trend in biomass of ages 1–3.

Further to expressing deep scepticism to the model used for the assessment of shrimp, concerns were raised by the NSAC industry regarding the methods used in surveys, such as changes in boat speed, small mesh sizes, and incomplete sampling scheme, which have led to an unreliable stock assessment. The assessment contrast with fishers' observations of a growing shrimp population. Specifically, it was noted that an increase in towing speed will reduce the height of the head rope, to go under the smaller shrimp which remains higher in the water column and resulting in lower recruitment estimates. To improve survey accuracy and better reflect stock changes, suggestions were made to collaborate with commercial ships for parallel surveys to compare with observed commercial catches and to implement year-round scientific monitoring.

Sole (North Sea)

In 2024, the sole stock assessment was benchmarked, addressing a significant retrospective pattern from 2023. The model now includes new data and corrects for ageing errors, resulting in a revised and robust stock assessment. Catches have declined substantially, with the lowest recorded catch in the time series occurring in 2023. Recruitment estimates over the past five years are low. Fishing mortality has decreased and is now below F_{MSY} , while SSB has fluctuated around $MSY B_{trigger}$, and recently decreased closer to it. Based on the MSY Advice, the headline advice corresponds to 10,196 tonnes representing a 177% increase in advice and a projected 20% decrease in SSB, which will be below $MSY B_{trigger}$ by year-end. The large increase in catch advice is mainly due the upward revision of stock status after the benchmark and alignment with advice from two year ago.

NSAC members call for the inclusion of ecosystem-based fisheries management (EBFM) considerations and implementation of the amalgamated results of many scientific studies on EBFM in ICES advice for all stocks, particularly for North Sea sole.

A large increase in the TAC for North Sea sole has been recommended, with advice shifting dramatically from a 63% reduction for 2024 to a 177% increase for 2025. Such a significant change bears considerable impacts on both the fishing industry and the marine environment. To address this, suggestions were made to consider stability clauses to mitigate such fluctuations, but the NSAC is in favour of setting the TAC in line with the scientific advice, to compensate for the excessive reduction from last year.

Sole (Eastern English Channel)

Catches for sole in this subarea have decreased compared to 2023. Recruitment has been low over the past four years, and fishing mortality is near F_{MSY} . SSB has declined and is currently below B_{lim} . Headline advice states a catch of 1,209 tonnes, which represents a 19.6% reduction in catch advice and a 7.6% increase in SSB. This advice reflects a lower initial stock size and revised recruitment estimates for 2023, alongside a lower target F .

The absence of a multiannual plan for the stock, which typically includes an MSY buffer to maintain less than a 5% risk of falling below B_{lim} , was noted as a concern. Suggestions were put to encourage managers to use F_{MSY} ranges instead of fixed advice.

Whiting (North Sea and eastern English Channel)

Catches have been stable over the past 20 years, with substantial recruitment observed in the last 5 years, exceeding historical averages. Fishing pressure has decreased recently due to increased biomass from high recruitment. As a result, SSB has significantly risen and is near historical maximums. The catch advice is 237,008 tonnes, reflecting an 85% increase in advice and a 47% decrease in biomass, attributed to updated F_{MSY} reference points.

The NSAC noted a discrepancy between the stock's scientific assessment and observations from the fishing industry in the Southern North Sea. There, fishers report no large recruitment,

only catching small individuals. It was suggested that the maturing age of whiting might be changing, with fish maturing earlier than before. Therefore, fishers in the Southern North Sea are catching older and more mature whiting which is still relatively small in size.

Whiting is known as a voracious feeder on young cod and in order to continue the rebuilding of the cod sub stocks, the NSAC advises that the TAC is set in line with the scientific advice.

Whiting (Skagerrak and Kattegat)

Category 3 methods were used for this assessment, applying the rfb rule. The PA approach produced a total catch of 455 tonnes, corresponding to a 30% reduction. This advice applies for 2025 and 2026.

Discrepancies between the TAC for whiting in this area and the North Sea stock were highlighted, with considerations of the lack of genetic differences between the North Sea and Skagerrak stocks and the potential benefit of combining them if no significant differences are found. The industry noted that the current advice, suggesting a 30% cut on an almost stable stock, promotes discarding and suggested that combining the stocks might mitigate this issue. This suggestion aligns with ICES' previous reluctance to invest in data collection for whiting in 3.a due to cost-benefit concerns.

Anglerfish

ICES' assessment confirms what the industry has long claimed, that the stock has grown steadily over many years.

ICES recommend that fishing can be increased by 211% compared to previous recommendations. An increase of 211% will be sufficient to compensate for the backlog that the industry has seen over a number of years and will prevent anglerfish from continuing to pose a choke risk experienced by fishers this year.

3 Conclusion

The NSAC thanks the Commission for the opportunity to comment on the scientific basis of the ICES advice and provide observations on the process of defining fishing opportunities for 2025. In the case of unclarity in the consideration of the above advice, we invite your services to contact us bilaterally.