

STATEMENT

Draft

Meeting: **Pre-MIRIA meeting on special requests and research priorities**

Parties: **DG MARE Science Unit**

Date: **13 January 2025**

Location: **Brussels**

Chair: **Raluca Ivanescu, DG MARE Science Unit**

NSAC Chair(s):

First of all, I'd like to thank DG MARE again for reacting so quickly to our initiative to improve stakeholder engagement in the most critical stage of the production of scientific advice. We're pleased to get the opportunity to provide our input on special requests and research priorities in terms of stock assessments and advice, but also to help shape future policy-stakeholder interactions, so that these exchanges can be efficient and fruitful and help implement ecosystem-based fisheries management (EBFM). There is now an urgent need to move to EBFM in order to account of biological and environmental interactions that affect our fish stocks and the marine environment, and since people are part of this ecosystem, we have the responsibility and ability to manage resources in a way that supports the integrity and resilience of nature and society. In this respect, ICES benchmarks should investigate other factors impacting fish populations, such as cormorants, seals, starvation, and interspecific competition, in addition to fishing.

We would like to stress the importance of making small but crucial steps towards EBFM as well as towards enhanced stakeholder engagement, which should eventually be formalized and systematic. We're almost making history today: the way we set the scene now will have implications for the way things are done in the future and especially in the way trust is built between stakeholders, science and policymakers.

Speaking about trust in the system. The NSAC currently has 2 relevant advice papers in the pipeline (to be approved). One on **the recent ICES advice revisions for cod, sole and whiting**, where we – the NSAC industry - question ICES' quality assurance mechanisms affecting members confidence in ICES' outputs. We call on ICES to ensure **thorough testing and robust peer review of the models** to prevent retrospective revisions in the future, but also on managers to ensure that sufficient resources are allocated to ICES to alleviate the pressure leading to such errors. **Meaningful stakeholder engagement** and input in the process are also advised for enhanced legitimacy of the advice. Finally, we advise **earlier scheduling the ICES Mixed Fisheries Working Group (WGMIXFISH)** to allow for scrutiny well ahead of the publication of the advice.

Since Cod is most affected stock in the North Sea, in the second paper we delve deeper into ecosystem considerations for this stock, in particular **climate change effects on cod productivity, distribution, and abundance**. We provide evidence for climate-induced changes in stock distribution and larval development and survival, calling for **sensible and realistic management of different stock components**. The main message there being the rationality of management measures for management outcomes that are biologically and ecologically impossible (according to the most recent science), and the need to include ecosystem considerations in stock advice immediately as they become known – this would constitute *de facto* “best available science”. We provide a list of recommendations on climate-informed stock advice and management strategy evaluations, and point to the need for genetic studies on cod subcomponents. We would like to advise the Commission to issue a **special request on climate effects on cod productivity, distribution and abundance for the three North Sea sub-stocks**, to inform future fishing opportunities. In addition, evidence suggests minimal mixing between Southern and other North Sea cod stocks, challenging the assumption of full stock mixing currently in the model. We, therefore, also advise **looking into the level of inter-stock mixing** to inform the advice.

We also have concerns about the relevance of **the zero-catch advice for the Kattegat cod**, suggesting 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, we believe that **an evaluation of the likelihood of Kattegat cod stock recovery shall be carried out**. The industry believes that all cod in the Kattegat have migrated from other areas, implying there is no local stock.

For **Whiting in the North Sea and Skagerrak and Kattegat** regions we would encourage ICES to **map out the stock distribution in a benchmark assessment for this stock**. Our observation is that advice for whiting in the North Sea and surrounding areas have been fluctuating significantly over the last 2-3 years, leading us to question the current perception of the stock’s distribution and we believe that this needs to be reevaluated.

In terms of the anticipated special requests listed earlier, we support the work of the Commission and Member States, in particular on long-term management strategies for demersal species. However, on future occasions we would find it particularly valuable to receive the **full draft text of specific requests**. This would allow us to analyse and comment on the critical assumptions informing the models.

More generally, we observe that **headline advice** often appears to be the only option followed by managers. We, therefore, 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. We also ask ICES to make this information more visible in the layout of the advice.

Finally, there are several stocks (plaice, lemon sole, northern shrimp) where fishers’ observations do not align with survey outcomes. This calls for **further integration of fishery-dependent data into stock assessments** and **science-industry partnerships** for year-round scientific monitoring, in order to make science as holistic as possible.

In the long-term it would be appropriate to think about the **involvement of dedicated scientists in individual ACs** where the ACs currently rely on industry experts. This will ensure a more balanced approach, active participation in scientific meetings, and strengthen evidence base in our advice.

Thank you again for organising this exchange, which we hope will be the first of many.