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

Dun Laoghaire, Brussels, 24 June 2026
NSAC reference: 09-2526

Dear Ms Vitcheva,

Subject: NWWAC/NSAC advice on skates and rays management

Background

Skate and ray fisheries management continues to be a priority topic for the members of the North Western Waters Advisory Council (NWWAC) and the North Sea Advisory Council (NSAC). Through the work in their joint Focus Group multiple advice submissions as well as joint workshops including UK stakeholders have taken place since 2019 (please see annex). Following Brexit, the current management approach is primarily driven by the legal obligation to maintain fish stocks at Maximum Sustainable Yield (MSY) levels, specifically by limiting fishing mortality in line with ICES advice. This must be balanced against the requirements of the Trade and Cooperation Agreement (TCA) with the UK.

On foot of recent 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. However, concerns remained regarding 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. Additionally, the mixture of management units and biological stock units has been described as a significant barrier to progress.

Most recently, members of the joint Focus Group have reviewed the work on potential updates to skate and ray (*Rajiformes*) fisheries management by the EU-UK ad hoc scientific expert group on skates and rays. Members welcome the work of this group and the attempt at simplifying the footnotes in particular and support many of the suggested amendments put forward by the expert group. However, the ACs wish to provide advice on several specific issues as identified below, whilst highlighting the fact that recommendations can only be made in relation to the NWWAC and NSAC's remit areas (ICES areas 6 & 7, and 4 & 3a respectively).

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Recommendations

1 Potential updates to skate and ray (*Rajiformes*) fisheries management Species prohibitions

The ad hoc expert group recommends that "A more thorough review of all the prohibited species listings could usefully be undertaken." The ACs fully support this.

Species/area	NWWAC/NSAC comments
undulate ray (*Raja undulata*) in United Kingdom and Union waters of ICES subarea 6 and Union waters of ICES subarea 10;	To properly reflect the stock distribution or ICES stock structure the text could be changed to indicate that only undulate ray in areas 7bc and 7jk would be on the list.
Norwegian skate (*Raja (Dipturus*) nidarosiensis) in Union waters of ICES divisions 6a, 6b, 7a, 7b, 7c, 7e, 7f, 7g, 7h and 7k;	It is recommended to fully clarify if there is an actual scientific basis for this prohibition.

2 Skates and rays *Rajiformes* in Union waters of 3a (SRX/03A-C.): Table 97 of EU's fishing opportunities (2025) and listed in Table 5 of the EU-UK Written Record

Current footnote(s)	NWWAC/NSAC comments
(1) Catches of cuckoo ray (*Leucoraja naevus*) (RJN/03A-C.), blonde ray (*Raja brachyura*) (RJH/03A-C.) and spotted ray (*Raja montagui*) (RJM/03A-C.) shall be reported separately.	NWWAC and NSAC support continued group management with separate reporting by the Member States for these stocks.

3 Skates and rays *Rajiformes* in Zone: Union and United Kingdom waters of 4; United Kingdom waters of 2a (SRX/2AC4-C): Table 96 of EU's fishing opportunities (2025) and in Table 1 of the EU-UK Written Record

Current footnote(s)	NWWAC/NSAC comments
(1) Catches of blonde ray (*Raja brachyura*) in United Kingdom and Union waters of 4 (RJH/04-C.), cuckoo ray (*Leucoraja naevus*) (RJN/2AC4-C), thornback ray (*Raja clavata)* (RJC/2AC4-C) and spotted ray (*Raja montagui*) (RJM/2AC4-C) shall be reported separately.	NWWAC and NSAC support continued group management with separate reporting by the Member States for these stocks.
(2) By-catch quota. These species shall not comprise more than 25 % by live weight of the catch retained on board per fishing trip. This condition applies only to vessels over 15 metres' length overall. This	The ACs believe that this by-catch quota provision has no effect on current fishing operations and therefore the ACs recommend its removal. For species in a good stock state, targeted fisheries should be an option.

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provision shall not apply for catches subject to the landing obligation as set out in Article 15(1) of Regulation (EU) No 1380/2013, which was retained by the United Kingdom.	However, if this is kept in place to protect spawning aggregations the ACs recommend that other management options should be evaluated as they may be more suitable than an annual by-catch provision. Any changes must be supported by scientific evidence taking into account socio-economic evaluations.

4 Skates and rays *Rajiformes* in United Kingdom and Union waters of 6a, 6b, 7a-c and 7e-k (SRX/67AKXD): Table 98 of EU's fishing opportunities (2025) and in Table 1 of the EU-UK Written Record

Current footnote(s)	NWWAC/NSAC comments
(2) Special condition: of which up to 5 % may be fished in 7d (SRX/*07D.), without prejudice to the prohibitions set out in Union and United Kingdom law for the areas specified therein. Catches of cuckoo ray (*Leucoraja naevus*) (RJN/*07D.), thornback ray (*Raja clavata*) (RJC/*07D.), blonde ray (*Raja brachyura*) (RJH/*07D.), spotted ray (*Raja montagui*) (RJM/*07D.), sandy ray (*Leucoraja circularis*) (RJI/*07D.) and shagreen ray (*Leucoraja fullonica*) (RJF/*07D.) shall be reported separately. This special condition shall not apply to small-eyed ray (*Raja microocellata*) and undulate ray (*Raja undulata*).	The ACs support the expert group's suggested amendment: "Special condition: of which up to 5 % may be fished in 7d (SRX/*07D.), without prejudice to the prohibitions set out in Union and United Kingdom law for the areas specified therein." The ACs further recommend to keep the original condition related to small-eyed ray included: "This special condition shall not apply to small-eyed ray (*Raja microocellata*) and undulate ray (Raja undulata)."
(3) Shall not apply to undulate ray (*Raja undulata*). Catches of this species in 7e shall be counted against the quantities provided for in that separate TAC (RJU/7DE.). When accidentally caught in 6a, 6b, 7a-c and 7f-k, this species shall not be harmed. Specimens shall be promptly released. Fishers shall be encouraged to develop and use techniques and equipment to facilitate the rapid and safe release of the species.	The ACs fully support the amendment suggested by the ad hoc expert group: "(2) Shall not apply to undulate ray (*Raja undulata*) in Division 7bc and 7jk (where it is a prohibited species) or in 7e. Catches of undulate ray in 7e shall be counted against the quantities provided for in the separate TAC (RJU/7DE.)."
4) Shall not apply to small-eyed ray (*Raja microocellata*), except in 7e, 7f and 7g. When accidentally caught, this species shall not be harmed. Specimens shall be promptly released. Fishers shall be encouraged to develop and use techniques and equipment to facilitate the rapid and safe release	RJE/07E and RJE/07D should be clearly separated, as they do not have the same sub-ceilings. Nevertheless, in line with ICES advice, a single ceiling would be logical. The option of a single sub-TAC should be explored, and fishing opportunities should therefore not be split between RJE/07E and RJE/07D, as the current division is based on a 50/50 allocation between the two areas. Additional measures such as trip limits may be implemented at Member States' level.

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of the species. Within the limits of the abovementioned quotas, no more than the quantities of small-eyed ray in 7f and 7g provided below may be taken.	

To assist fishers at sea in complying with the legal requirements, species identification at sea must be easily carried out, solid and robust to avoid confusion and contradictions also between fishers and other entities such as fisheries control agencies or auctions. The ACs identified this issue in their 2022 advice to the European Commission (link) and reiterate that a harmonised approach across all Member States should be supported by the Commission especially regarding funding availability for information dissemination as well as training. Visual identification of various skates and rays species is inherently difficult and fishers should not be penalised for genuine mis-identification in challenging conditions at sea.

As discussed in the workshop on Skates and Rays management in September 2025[1], artificial intelligence (AI) and image recognition may significantly improve identification of skates and rays in fisheries. Current research focuses on automating catch identification, fish measurement, age determination, and quality assessment using AI, hyperspectral imaging, and synthetic datasets. AI outputs are integrated with metadata such as GPS and environmental conditions to support data-driven fisheries management. Applications including the MOFI app and Marine Beacon project aim to improve species classification and monitoring. Continuous model retraining, expanded datasets, and vessel-specific AI systems are expected to strengthen sustainable fisheries management.

5 (b) Utility of 'of which' clauses within the TAC for skates and rays

The ad hoc expert group "noted that those species/stocks with a large quantity of advised landings could also be separated out, as this may also to provide indirect benefit to more data-limited stocks." The ACs request clarification on how this would benefit data limited stocks and caution against changes which have not been fully scientifically analysed as these may lead to unintended consequences.

The "of which" clauses are intended to better reflect ICES stock-by-stock advice and the actual distribution of rays' populations. However, the reference period used to allocate percentages between ICES divisions 7d, 4 and 3a no longer reflects current catch patterns. Moreover, this fixed allocation is applied uniformly across all species, without accounting for differences in their distribution between management areas.

[1] https://nwwac.org/meeting/nwwac-nsac-workshop-on-skates-rays-management/

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During the 2010s, when the reference period underpinning the current allocation split was established, catches were constrained by TAC limitations, resulting in lower catch levels in 7D compared with 4C. Average catches for 2015–2017, which form the basis of the current allocation key, show catch proportions of 0.53 in SRX/2AC4-C and 0.47 in SRX/07D[2].

Since then, recent benchmark developments have improved scientific assessments and catches now better reflect the actual distribution of the stocks. Catch data for 2021–2023 show a clear shift towards 7D, with proportions of 0.34 in 4C and 0.65 in 7D.

This demonstrates that, if new sub-TAC ceilings for SRX species are introduced without reviewing the reference period, the discrepancy with the actual stocks' distribution will continue to widen, thereby significantly constraining fishing opportunities for certain Member States.

We would like to stress the importance of close cooperation between scientists, managers and the fishing sector to identify, by consensus, the species and areas for which such mechanisms are appropriate, while also taking into account the potential socio-economic impacts on the fleets concerned. While we recognise that this remains a complex issue within the TCA framework, it is one that will eventually need to be addressed.

Conclusion

Overall, AC members believe that better scientific knowledge regarding the distribution and abundance of stocks within the various management areas is needed in order to fully support certain current measures as well as potential changes.

The Advisory Councils fully support the ad hoc expert groups finding that "An improved consideration of stock units, finer resolution analyses of landings data, discard survival, life-history, market price, relative importance to various métiers etc. would ideally be undertaken before establishing further clauses." Enhanced collaboration between the fishing industry and scientists can improve the quality, coverage, and reliability of fisheries data, supporting more effective and sustainable management. Greater cooperation enables better understanding of stock units, finer-scale analyses of landings and discards, and improved knowledge of species life-history traits, discard survival, market value, and importance across different métiers. Fishers' practical knowledge can complement scientific research, while increased data sharing can strengthen stock assessments and management advice. Before introducing additional regulatory clauses, these factors should be carefully evaluated to ensure measures are

[2] https://www.ices.dk/data/dataset-collections/Pages/Fish-catch-and-stock-assessment.aspx (official Nominal Catches 2006-2013)

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evidence-based, regionally appropriate, and socially and economically balanced, supporting both conservation objectives and viable fishing communities.

In conclusion, the ACs caution against a rushed approach to the implementation of any changes regarding the fisheries management of skates and rays and recommend that changes are only made when scientific evidence is complete and fully available. This should be supported by a socio-economic analysis to prevent any unintended consequences for fishers.

Both NWWAC and NSAC 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 and direct engagement with the ACs regarding the management of these species.

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

Yours sincerely,

Alexandra Philippe
NWWAC Chair

Peter Ronelöv Olsson
NSAC Chair

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Annex

- 2019: Best practices for Avoidance, Selectivity, and Survival of Skates and Rays, submitted to the Scheveningen Regional Group (link)
- 2019: NWWAC Advice on the Programme of Measures for Skates and Rays (link)
- 2020: Response to the Scheveningen Group request for guidelines on best practices for handling catches of skates and rays in the North Sea and Skagerrak (link)
- 2020: NWWAC Advice on skates & rays (link)
- 2021: Joint NSAC/NWWAC response to the Scheveningen Group on best practice measures for managing skates and rays in the North Western Waters and the North Sea (link)
- 2021: NWWAC Advice on best practice measures for the management of skates and rays in the North Western Waters (link)
- 2021: Joint NWWAC/NSAC request for updated scientific information on skates and rays (link)
- 2022: NWWAC Advice on best practice measures for the management of skates and rays in the North Western Waters and the North Sea (link)
- 2022: Joint NWWAC/NSAC Request for harmonisation of skates and rays identification guides on an EU wide basis (link)
- 2023: NWWAC/NSAC advice on skates & rays management (link)
- 2024: NWWAC/NSAC letter on TAC setting for skates & rays (link)
- 2025: NWWAC/NSAC response to the UK Consultation on the proposed Southern North Sea and Channel Skates and Rays Fisheries Management Plan (link)
- 2025: NWWAC/NSAC advice on skates and rays management (link)

- 2023 NWWAC/NSAC workshop on skates & rays management (link)
- 2025 NWWAC/NSAC workshop on skates & rays management (link)

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