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Parecer 99: Regulamento TACs e Quotas 2016

As decisões tomadas aquando do Conselho dos Ministros do final deste ano sairão amplamente do quadro do tradicional estabelecimento das Possibilidades de Pesca, pois definirão certas condições ligadas à Implementação da Obrigação de Desembarque.

Com vista a essa data, os Membros do CC Sul endereçam as recomendações incluídas nesse regulamento, na esperança que sejam levadas em consideração.

Observações Gerais:

De modo geral, a aplicação das regras de exploração a longo prazo validadas pelos decisores políticos e, quando compatível com os objectivos MSY, deve ser a prioridade. Nos vários outros casos, o que importa é o alcance do objectivo MSY o mais cedo possível, excepto se o impacto socio-económico for considerado como sendo demasiado importante, como inscrito na PCP. Nesse âmbito seria oportuno organizar reflexões sobre o assunto, quando a variação inter-anual das possibilidades de pesca excede os – 20%. Contudo, nenhum valor deveria ser considerado como um nível de desencadeamento, e é necessário as referidas isenções serem sustentadas por pareceres científicos, dificultando o menos possível o alcance do objectivo MSY.

Mais uma vez, o CC Sul relembra que as negociações poderiam utilmente beneficiar do facto de se dispor de escalões de Mortalidade que autorizam uma produção maximizada, pelo que lamenta que essa base científica não seja disponibilizada com vista ao Conselho dos Ministros.

Este ano, para além do tradicional estabelecimento das Possibilidades de Pesca, o Regulamento «Tac e Quotas» também deverá especificar determinados mecanismos relacionados com a implementação da Obrigação de Desembarque. Os referidos mecanismos («quota uplift»; Flexibilidade Inter-Espécies e Flexibilidade Inter-anual) condicionarão imenso a velocidade com a qual um dos principais objectivos da PCP – a levada em consideração de todas as capturas na gestão – será cumprido. Os membros do CC Sul regozijam-se, deste modo, pelos vários trabalhos científicos levados a cabo para a definição desses mecanismos se fundamentar em elementos fiáveis. Estes mesmos membros surgem, contudo, inúmeras questões relativamente à definição desses mecanismos (fiabilidade dos dados, cumprimento da Estabilidade Relativa entre Estados Membros, repartição das quotas atribuídas nos termos do Art. 16.2 da nova PCP, não aumento da mortalidade por pesca induzido pela quota *uplift*..). Espera-se que as práticas que levaram a uma melhoria da selectividade sejam valorizadas nesse âmbito, pois são, decerto, a melhor ferramenta para acompanhar a nova PCP). Por esse motivo, o CC Sul só pode lamentar a ausência de diálogo sobre o método em torno da definição desses mecanismos bem como apelar ao carácter meramente transitório das decisões





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tomadas sobre esses assuntos até à concretização de trabalhos de consolidação e novas reacções.

O CC Sul reagirá, por conseguinte, no que respeita a esses assuntos, durante o 1º semestre de 2016. De modo mais pragmático e, na ausência de plano de gestão para a maior parte das pescarias abrangidas, o CC Sul recomenda que o estabelecimento das possibilidades de pesca seja apoiado por uma toma em consideração dos pareceres científicos em sua globalidade, mais além da estrita análise dos pareceres científicos mono específicos. A título de ilustração, seria oportuno, com vista a facilitar a implementação da Obrigação de Desembarque, evitar as divergências das evoluções das possibilidades de pesca para stocks, cuja correlação seja conhecida nas capturas. No aspecto socioeconómico, as consequências também serão ponderadas, levando em consideração a totalidade das evoluções das possibilidades de pesca, a fim de apreciar os impactos à escala das frotas ou pescarias, avaliando, nomeadamente, as possibilidades de reporte.

Relativamente a alguns pontos mais específicos, o CC Sul gostaria, para além disso:

- Que a Comissão Europeia e o Conselho dos Ministros esclarecesse e adoptasse uma posição comum relativamente à aplicabilidade dos «antigos» Planos de Recuperação (Linguado VIIIab, Pescada Austral..). É óbvio que esses regulamentos já não estão em consonância com os objectivos da nova PCP, nomeadamente no que respeita ao alcance do MSY. No entanto, todos os mecanismos incluídos nesses regulamentos (AEP, Effort..) continuam a aplicar-se. É, por esse motivo, particularmente importante esclarecer a situação em torno desses Planos, revogando eventualmente aquilo que o tem de ser ou, pelo contrário, confirmando as disposições que se devem aplicar, na expectativa do novo Plano de Gestão para as águas do SWW.
- De expressar o seu interesse pelo prosseguimento dos trabalhos orientados para uma gestão verdadeiramente específica de determinados stocks. O facto de serem definidas oportunidades de pesca através da acumulação de várias espécies não é satisfatório, pelo que convém atribuir meios adicionais aos institutos científicos, para sustentar uma gestão mais específica., o que poderia autorizar o FEAMP. Para além disso e desde que se cumpram todos os requisitos (identificação das espécies...), será necessário seguir em frente.
- No que respeita aos stocks que não dispõem de avaliação analítica, o CC Sul gostaria de recordar os seus elementos de posicionamento - infelizmente não consensuais na presente data. Para as ONGs ambientais, a definição das possibilidades de pesca deveria ser realizada no estrito respeito das possibilidades de pesca. Para os representantes do sector, o método proposto pelo CIEM não pode ser aceite no seu estado actual, tendo em conta que, designadamente, baseando-se em dados de capturas, este põe, em parte, em causa alguns elementos da estabilidade relativa.



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- De salientar que o princípio subjacente à Obrigação de Desembarque, a levada em consideração de todas as capturas também implica ter em conta a abundância dos recursos, na ausência de avaliação analítica que reja o estabelecimento das possibilidades de pesca.

-Contribuições recebidas: ADAPI, VIANAPESCA, Federacion de Cofradias de Guipuzkoa, PESGALICIA, CNPMM, ANOP, OP Pêcheurs d'Aquitaine , Seas at Risk, OCEANA, LPN,.



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Anexo 1: recomendações dos membros do sector do CC SUL:

As propostas que se seguem inscrevem-se no quadro clássico do estabelecimento das possibilidades de pesca, isto é, expressam-se independentemente dos mecanismos subjacentes à Obrigação de Desembarque. Contudo, o CC Sul salienta que as bonificações de quotas somente deverão ser praticadas no caso das pescarias realmente sujeitas à obrigação de desembarque em 2016. Para além disso, o CC Sul interroga-se mais globalmente sobre as decisões que serão tomadas no caso de os pareceres do CIEM já levarem em consideração as rejeições e, logo, estabelecerem recomendações em termos de captura. É importante que todas as decisões tomadas nesse âmbito sejam apreendidas num quadro global, permitindo um verdadeiro progresso da implementação da Obrigação de Desembarque. Será, de qualquer modo, vital, dispor de elementos metodológicos que orientem essas decisões, com vista à sua análise e comunicação aos intervenientes.

- - Linguado VIII:

Em 2013, o Conselho Consultivo para as Águas Ocidentais Sul propôs (Parecer 83) regras de exploração do stock de Linguado do Golfo da Biscaia, validadas pelo CIEM. A aplicação da medida de salvaguarda relacionada com um nível de biomassa inferior à biomassa limite, deveria, teoricamente, levar à fixação do TAC ao nível do RMD (-37%) em 2016. Todavia, permanece uma grande incerteza quanto aos valores do objectivo FRMD e da biomassa de precaução decididos pelo CIEM no seu parecer. Os recentes trabalhos de actualização dessa referência (WKMSYREF – CIEM, 2015) devem ser integrados para adaptar verdadeiramente as modalidades de gestão à taxa de exploração sustentável do stock ($F_{max} = 0,46$, sendo o FRMD actualmente estabelecido de 0,26).

Para além disso, foi estimado (Universidade de Nantes, 2015) que o impacto socioeconómico de tal redução representaria uma perda do Volume de Negócios do sector de perto de 37 Milhões bem como cerca de 240 empregos ameaçados.

Neste contexto, propõe-se uma limitação da redução do TAC para 10 % (de modo a fazer face ao aumento da mortalidade por pesca dois anos consecutivos), acompanhada de medidas complementares, propostas a nível nacional, para manter o benefício potencial de um recrutamento com recente melhoria. Estas propostas deverão estar equilibradas entre as diferentes frotas e levar em consideração a contribuição relativa das diferentes profissões para a mortalidade por pesca, possibilitando, assim, a redução do esforço de pesca para os navios com pesca especificamente dirigida ao linguado, melhorando simultaneamente a sua selectividade.

- Lagostim VIII:

O parecer do CIEM é idêntico ao do ano passado, em que foram constatadas evoluções positivas para o stock de Lagostim do Golfo da Biscaia, com um aumento da biomassa,



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que registou o seu nível histórico mais alto e uma pressão de pesca com redução progressiva (O CIEM indica que as capturas poderiam aumentar 14 % devido às recentes tendências dos índices de abundância – Campanha Langolf). O nível de biomassa actual está alto e as capturas de 2015 foram importantes, com uma quota plenamente usada. O **TAC 2016 deveria ser mantido ao nível de 2015, ou seja 3899 toneladas.**

Para além disso, o início de uma campanha de vídeo de determinação de índice de abundância deveria garantir a análise deste stock, estando agendado um workshop do CIEM para finais do ano de 2016.

- Lagostim IX:

Também o parecer do CIEM para a zona IX é idêntico ao do ano passado, e recomenda um TC de 321 toneladas, constatando o bom estado da biomassa do stock. A quota de Portugal em 2015 foi de 190 toneladas e apenas medidas extraordinárias de gestão, totalizando 111 dias de suspensão de pescaria, impediram que a mesma se esgotasse prematuramente. Desta forma, o TAC 2016 deveria ser aumentado em 20% para as 305 toneladas.

- Pescada Ibérica:

O alcance do objectivo MSY para este stock logo em 2016 parece ter um grande impacto no sector da pesca, com uma proposta de – 62%. Não tendo o plano de recuperação deste stock sido revogado, os membros do CC Sul interrogam-se quanto à legalidade de um TAC que representaria uma variação interanual superior a -15%. Para além disso, congratulam-se com a proposta de um *statu quo* no que respeita ao número de dias no mar atribuídos aos grupos de artes regulamentadas, bem como com a renovação da taxa de 8% como nível de definição do desencadeamento do acompanhamento do esforço. Para o sector, estes dois pontos constituem reivindicações fortes, que, apesar de tudo, não devem ser entendidas como uma medida de atenuação de uma redução do TAC demasiado brusca. Os membros do sector solicitam expressamente que a redução das possibilidades de pesca não exceda um máximo de 15%.

- Areeiro VIIIc – IXa:

Em primeiro lugar, os Membros do CC Sul gostariam de referir que este stock foi alvo de uma forte redução das possibilidades de pesca no ano passado (-39%). Por esse motivo, a proposta de uma nova redução consequente (-26%) para o próximo ano está a ser muito mal recebida. A definição das possibilidades de pesca baseia-se, em parte, no facto de serem compreendidas duas espécies. Todavia, é útil notar que, no caso da espécie mais abundante (*Lep. Boscii*), os níveis de biomassa alcançados em 2014 nunca mais tinham sido observados desde o final dos anos 1980. Para além disso, convém notar que



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um *roll-over* das possibilidades de pesca para o próximo ano conduziria a uma estabilidade da biomassa e a uma ligeira redução (-3%) destas duas espécies.

O sector português gostaria de assinalar que, naquilo que lhe diz respeito, esta quota é extremamente restritiva. Os membros do sector do CC Sul requerem unanimemente uma redução das possibilidades de pesca muito inferior ou o *statu quo* das mesmas.

- Tamboris VIIIc – IXa:

Os argumentos avançados para o areeiro também podem servir para o tamboril. Mais uma vez, requer-se uma redução das possibilidades de pesca proposta (-19%) e deseje-se um *statu quo*, o que levaria à estabilização destas duas espécies em níveis de biomassa e de exploração relativamente satisfatórios, não pondo em perigo o cumprimento a curto prazo do objectivo MSY.

- Raias VIII – IX:

Sendo o parecer do CIEM válido para 2015 e 2016, a decisão mais lógica seria muito provavelmente a renovação das possibilidades de pesca. No entanto, tendo em conta as inúmeras reduções de TAC observadas no passado, um ligeiro aumento dessas possibilidades de pesca seria extremamente apreciado pelo sector. Pela parte de vários membros do sector português, deseja-se um aumento de 10%



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Anexo 2: parecer conjunto de Seas At Risk, OCEANA, WWF e LPN



Specific recommendations on fishing opportunities

Common name	Management area	2015 TAC	2016 COM proposal	2016 NGO proposal
Sole	VIIIab	3800	pm	2393 (-37%) – 2660 (-30%)
Nephrops	VIIIabde	3899	pm	3214 (-17%)
Hake	VIIIc, IX, X, CECAF 34.1.1	13826	pm	5292 (-62%) – 9560 (-31%) + Uplift
Megrim	VIIIc, IX, X, CECAF 34.1.1	1377	1013 (-26%)	1013 (-26%)
Monkfish	VIIIc, IX, X, CECAF 34.1.1	2987	2413 (-19%)	2413 (-19%)
Rajidae	VIII, IX	3420	3078 (-10%)	2736 (-20%)

Sole VIII

For common sole in division VIIIab fishing mortality is above the precautionary fishing mortality reference point FPA and biomass is below MSY Btrigger, which equals the precautionary biomass reference point BPA for this stock. In 2013 the stock was considered to be in a stronger state and was above MSY Btrigger. Sadly, continued Council action setting TACs above scientific advice has caused the stock to decline below precautionary levels.

For this stock ICES advises, based on the MSY approach, that catches in 2016 be no more than 2393 tonnes, which implies a 37% TAC reduction. All catches are assumed to be landed. This proposal also implies a fishing mortality reduction to 0.26. NGO support this proposal to stabilise the recovery of the stock and reduce the fishing mortality although if there are evidences that such reduction will jeopardize the socioeconomic sustainability of the fleets a lower reduction up to 30% could be also supported. It is worth noting that the multiannual plan for sole in the Bay of Biscay (Regulation (EC) No 388/2006) the target of which is estimated to be achieved does not provide any basis for TAC advice for 2016.

Nephrops VIII

In the North and Central Bay of Biscay (VIIIab), two functional units (FU23) and (FU24) are assessed together. The stocks are defined as a data-limited stock, its condition is not well known. Trends in biomass indicate an increase in the last two years (2013 and 2014), by 14% with respect to the biomass average of the three previous years (2010-2012). Anyway biomass index from 2006-2013



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shows no clear trend. Fishing mortality has been declining in recent years and recruitment has shown a downwards trend also in recent years.

For the North and Central Bay of Biscay (VIIIab) survivability exemption from the landing obligation will apply to catches of the fishing gears that represent 99% of the previous discards in the area, therefore a management based on landings should continue. ICES advises that landings be no more than 3214 tonnes based on the ICES approach for data-limited stocks. This corresponds to removals of no more than 4224 tonnes, assuming that discards rate do not change from the average of the last three years (2011-2013). NGO agree with this approach and recommends the Council follows this TAC advice, which implies a reduction in catches of 17% for 2014.

Southern hake stock

The Southern hake stock is being seriously overfished with a fishing mortality of 0.73 (FMSY is 0.24), and the stock is in a poor state with a biomass of 16 443 tonnes, only just above BLIM. If Council wishes to improve both the health of the stock and the socio-economic conditions for the fisheries then urgent change is required. Member States put forward a joint recommendation for a discard plan including Southern hake that the Commission has transposed into a delegated act (COM (2015) 6835). Regrettably, not all fisheries and fleets targeting the stock are covered under this discard plan, which complicates the calculation of the final TAC. A management plan had been agreed in 2005 with the aim to rebuild the stock to safe biological limits and reduce fishing mortality by 2016. The intent was a biomass recovery to above 35 000 tonnes and a reduction in the fishing mortality rate to 0.27. This plan has not been evaluated by ICES thus cannot be used as the advice basis.

For the Southern stock, South of Bay of Biscay (VIIIc) and East of Portuguese waters (IXa), ICES advises, on the basis of the MSY approach, that landings be no more than 5292 tonnes in 2016, which implies a reduction in TAC by 62%, and catches of no more than 6078 tonnes if discard rates do not change from the average of the years 2012-2014. NGO consider that if there is evidence of the socio-economic impact of such a reduction, a lower reduction with lower impact on sustainability could also be acceptable, between 30% ~ 62%.

The Southern hake stock will be partially affected by the landing obligation, so a TAC adjustment has to be made, uplift, to consider the previous discards.

Megrim VIIIc IXa

In the Iberian Peninsula, South of Bay of Biscay (VIIIc) and East of Portuguese waters (IXa) the ICES stock assessment differentiates the two species caught. The *L. boschii* biomass continues increasing in an upward trend since 2001, when it was at its lowest recorded level, and it is in a record high in 2014 above MSY trigger. Fishing mortality has been declining throughout the time-series but has been increasing considerably in the last two years and it is currently well above Fmsy. Recruitment has been around average since 2000, with the exception of a record high in 2009 and 2012. The range of discards is substantial and estimated between 39-63% (in numbers) although this is considered to be an underestimation.

For the stocks of the Iberian Peninsula, South of Bay of Biscay (VIIIc) and East of Portuguese waters (IXa), ICES advises on the basis of the MSY approach, that combined landings of megrims should be no more than 1013 tonnes in 2016 (841 tonnes of *L. boschii* plus 172 tonnes of *L. whiffiagonis*). If discard rates do not change compared to the average of the last 5 years this implies catches of no more than 1259 tonnes, which represents a 26% TAC decrease. NGO agree with this advice, as it is necessary to reduce fishing mortality to the MSY framework and stop the biomass red trend observed last year. NGO regret the strong variations in catch limits between years (86% increase in 2014, 36% decrease in 2015) in order to provide progressive stability in fishing opportunities.



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Monkfish VIIIc IXa

In the Iberian Peninsula, south of the Bay of Biscay (VIIIc) and west of Portuguese waters (IXa) the state of anglerfish stocks depends on the species. *L. budegassa* anglerfish stock is in good condition and currently above the Bmsy trigger thanks to a progressive reduction in mortality since 1999, which has been below Fmsy since 2008. *L. piscatorius* stock status is unknown in relation to any potential biomass reference point, but is estimated to be in an intermittently increasing trend over the last 20 years, in response to a fishing mortality decrease trend since the late 80s, that is currently placed right above Fmsy. Recruitment for *L. piscatorius*, which constitutes around 65% of the total anglerfish landings, has been low in recent years with no evidence of strong year classes since 2001. Discards are known to take place but cannot be quantified. A large proportion of catches include immature fish.

For the Iberian Peninsula, South of Bay of Biscay (VIIIc) and West of Portuguese waters (IXa), ICES advises that, based on the MSY approach, catches of anglerfish in 2016 should not exceed 2413 tonnes, 1070 tonnes of *L. budegassa* and 1343 tonnes of *L. piscatorius*, which implies a 19% decrease in TAC versus the previous year. NGO recommend that this advice be followed, as all catches are assumed landed. Furthermore, NGO suggest a precautionary reduction be applied in the event that the management of the two species cannot be differentiated since the management of the two anglerfish species under a combined TAC could mean less control of the single-species exploitation rates and could lead to the overexploitation of either species.

Rays VIII IX

All skate and ray species are managed under a combined TAC in the respective management unit. While the status of some species is improving, most stocks are overexploited and fishing opportunities are in need of precautionary cuts to reduce fishing mortality.

Moving to a system of individualised TACs would provide an incentive to improve the state of these stocks. Moreover, the involved fishing industry will be damaged if they are unable to exploit a healthy stock due to restrictions imposed on the collective outlook for the species.

NOG urge the Council to establish individual TACs for each species, or species group, based on the advice provided by ICES, and an immediate precautionary reduction of all skate and ray TACs of 20%.

Annexe III : Contribution de Seas At Risk



Annex: Comments and recommendations for Member States on the

Commission proposal for a Council Regulation fixing for 2016 the fishing opportunities for certain fish stocks and groups of fish stocks

COM (2015) 559

17 November 2015

We provide our recommendations to the Council for the setting of fishing opportunities in 2016, building on the latest advice from the International Council for the Exploration of the Sea (ICES).¹

In its proposal for 2016 fishing opportunities in the North Atlantic and North Sea, the Commission does not give a recommendation for Total Allowable Catches (TACs) for 88 of the main group of 153 TACs. This omission of a large group of TAC recommendations is due to the fact that the related scientific advice was not yet available, that the TAC required further analysis due to complexities related to the landing obligation, or that the TAC is subject to international negotiations or arrangements concluding after the publication of the proposal. In the case of the landing obligation, we propose principles that should be followed for the calculation of these TACs. In the other cases, we propose a total catch which should not be exceeded by the joint fishing nations.

Objectives of the Common Fisheries Policy

A key objective of the Common Fisheries Policy (CFP) is **to restore and maintain stocks above biomass levels capable of producing Maximum Sustainable Yield (MSY)**. This objective is in line with the EU commitments made in Johannesburg (2002),² and Rio (2012)³ and contributes towards achieving Good Environmental Status (GES) for European seas under the Marine Strategy Framework Directive (MSFD).⁴ Moreover it was reaffirmed in September this year in the UN Sustainable Development Goals.⁵

In its proposal for fixing 2016 fishing opportunities (COM (2015) 559) the Commission states, “The ultimate objective is to bring and maintain the stocks to levels that can deliver MSY”. The Commission disappointingly falls short of the CFP objective to bring and maintain stocks above levels that can deliver MSY.

Ministerial decisions affect the sustainability of fish stocks

According to the chair of the ICES Advisory Committee, Eskild Kirkegaard, ‘over the last ten to fifteen years, we have seen a general decline in fishing mortality in the North East Atlantic and the Baltic Sea. The stocks have reacted positively to the reduced exploitation and we’re observing growing trends in stock sizes for most of the commercially important stocks.’⁶

There is a clear correlation between reduced mortality and stock growth and we commend the Council for moving in this direction for many stocks, albeit more slowly than has been advised by scientists. However,

¹ Full ICES advice is available at <http://www.ices.dk/publications/library/Pages/default.aspx>

² Johannesburg Declaration, WSSD, 2002.

³ Rio+20 Outcome document. The future we want. United Nations General Assembly A/RES/66/288

⁴ Directive 2008/56/EC establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive).

⁵ UN Sustainable Development Goals: Goal 14 available at <http://www.un.org/sustainabledevelopment/oceans/>

⁶ ICES press release, 14 July 2015, at <http://www.ices.dk/news-and-events/news-archive/press-releases/Pages/Positive-state-of-ICES-fish-stocks-presented-to-European-Commission.aspx>

the Council has consistently set catch limits exceeding scientific advice. From 2003 to 2014, Council TACs exceeded sustainable catch levels on average, by 11 to 59%.⁷

The fishing industry has consistently called for Ministers to support a move to “high-yield fisheries”. The socio-economic consequences of dwindling fish stocks have seen reductions in fisheries employment for decades.⁸ Growth, in terms of the value of landings and gains in employment are to be found in restored, healthy and large fish stocks. Further delays to reaching this objective only make it harder to achieve in the future.

Recommendation: The Council must set fishing opportunities below the exploitation level that corresponds with F_{MSY} as soon as possible, and by 2020 at the latest, in order to achieve the main CFP objective to bring and maintain stocks above levels that can deliver MSY.

Landing obligation

From January 2016 several Atlantic demersal stocks will fall under the landing obligation as foreseen in the CFP which will have important effects on the fixing of Atlantic fishing quotas or Total Allowable Catches (TAC). However, the joint recommendations provided by the respective Member States’ groups and the resulting delegated acts from the Commission will make the landing obligation difficult to implement and control, as these will apply only to some fishing gear types and catch profiles. Thus they may not apply to all fleets fishing a stock and some discarding will still occur.

Article 16 of the CFP stipulates that fishing opportunities for stocks that fall under the landing obligation will be fixed taking into account total catch rather than only landings, as was previously the case. This is explained by the fact that the amount of fish which was previously caught but discarded will now also be landed. In practice this should result in an increase (uplift) of the TAC by an amount equal to the ratio of catch previously discarded. However, ICES provides scientific advice on 2016 catches and landings for each stock across its range, and not per fishery, let alone by fleet segment. Therefore, any proposed uplift of the TAC becomes very difficult to calculate where a stock is fished by a combination of fleets that are obliged to land bycatch and those that may legally continue to discard unwanted catch. The Commission has asked the Member States to provide the necessary data, and the Scientific, Technical, and Economic Committee for Fisheries (STECF) to determine the appropriate TAC uplift per each fleet segment given differences in fleet discard rates.⁹

For fleet segments where no discard information is available, the Commission has further requested STECF to analyse the likelihood that fishing mortality will increase if a stock-wide average discard rate provided by ICES is used to calculate discard uplifts for individual fleet segments. In cases where STECF identifies a “high risk” using this average discard rate, they shall consider an alternative discard rate.

Following the final agreement on TACs during the December Council meeting and swaps between Member States, it remains the task of the respective ministries and authorities to distribute the quotas to the different fleets. This distribution must follow the logic outlined above so that only fleets which are subject to the landing obligation in 2016 receive an uplift.

⁷ EC consultation on fishing opportunities for 2015. COM (2014) 388. at http://ec.europa.eu/dgs/maritimeaffairs_fisheries/consultations/fishing-opportunities-2015/doc/com-2014-388_en.pdf

⁸ “Food for an additional 160 million EU citizens. An extra €3.2 billion in annual revenue. 100,000 new jobs across the continent. This could be the reality if EU waters were properly managed and damaged fish stocks allowed to return to their maximum sustainable yield (MSY).” (new economics foundation, Landing the blame: overfishing in northern European waters, 2015)

⁹ STECF plenary meeting 15-03, Terms of Reference, at https://stecf.jrc.ec.europa.eu/c/document_library/get_file?uuid=4b493ea2-b27b-42bc-adce-e054872cd172&groupId=43805

Recommendation: We urge Ministers to adhere to the following principles when agreeing on TACs uplifts:

- Any TAC uplift should only be based on the share of previous discards by those fisheries and fleets that fall under the landing obligation, and not automatically on the total discards of all fleets subject to the respective TAC. Applying an uplift based on the total discards while parts of the fleets that fish on that stock are still discarding would result in “double counting” of discards and an unintended increase in fishing mortality beyond scientific advice.
- A TAC uplift for any fleet segment subject to the landing obligation should only be granted if Member States have provided relevant data to the Commission to calculate that TAC uplift. If not enough relevant data have been provided, then that fleet should not receive a TAC uplift. Under no circumstances should the granted TAC uplift increase the total fishing mortality of that fleet segment.
- The foreseen exemptions of the landing obligation such as ‘de minimis’ can reach up to 7% of the total TAC in the first two years after the respective landing obligation has come into force. These discarded amounts must be subtracted from the calculated uplifts following Art 15.5(c) of the CFP to avoid “double counting” of discards and an unintended increase in fishing mortality.
- In all cases, the final agreed TAC including any uplifts should always remain below the respective F_{MSY} value of the whole population, across management areas, following Art 2.2 of the CFP Regulation. This is in line with the Commission Communication on fishing opportunities of June 2015, stating that TAC adjustments must not increase fishing mortality.

Coherence of management areas and assessment areas

Assessment areas in scientific advice capture a stock across its full range. However, the full ranges of many North Atlantic and North Sea stocks straddle multiple management areas. This mismatch between management areas and assessment areas makes projections of exploitation rates as well as the application of the MSY approach difficult. It also reduces the accuracy of the estimates of stock development and stock status, leading to mismanagement and a higher risk of overfishing.

The following stocks have considerable mismatch between assessment areas and management areas:

- Anchovy in IX, X, CECAF 34.1.1;
- Megrim in IIa (EU), IV (EU), VIIIc, IX, X, CECAF 34.1.1 (EU), VII and VIIIabde;
- Anglerfish in VIIIc, IX, X, CECAF 34.1.1, VII and VIIIabde;
- Whiting in VIII, Vb, VI, XII and XIV;
- Haddock in VIIb-k, VIII, IX, X and CECAF 34.1.1 (EU);
- Hake in VIIIc, IX, X, CECAF 34.1.1 (EU) and overall northern TACs (IIIa/IIa and IV/Vb, VI, VII, XII and XIV/VIIIabde);
- Cod in VIa, Vb and VIIb, c, e-k, VIII, IX, X and CECAF 34.1.1 (EU);
- Nephrops in IIa, I, X and CECAF 34.1.1; and
- Pollack in VII.

Whilst changes to the management areas require significant effort, this is ultimately necessary in order to manage stocks according to scientific advice and meet the objectives of the CFP.

Recommendation: We urge the Council to work with the Commission to align the current management areas with the assessment areas used in scientific advice.

Detailed summary of recommendations for fishing opportunities in EU waters

Due to the large number of stocks covered by this proposal, we have chosen to limit our detailed recommendations to a few species which require close attention.

Recommended TAC for 2016, in tonnes, for selected North Atlantic and North Sea stocks

Common name	Management area	2015 TAC	ICES ¹		2016 COM proposal ²	2016 SAR/FISH TAC recommendations ³
			2014 F < F _{msy}	2015 SSB > MSY Btrigger		
Anglerfish ⁴	VII	33516	?	?	29534	Mismatch
	VIIIabde	8980			7914	
	VIIIc, IX, X, CECAF 34.1.1 (EC)	2987	YES(L.b.)/NO(L.p.)	YES(L.b.)/?(L.p.)	2413	
Cod	Vlb; Union & int. waters of Vb west of 12°W, XII, XIV	74	?	?	74	16 (-78%)
	Vla; Union & int. waters of Vb east of 12°W	0	NO	NO	0	0 (0%)
	VIIbce-k, VIII, IX, X, CECAF 34.1.1 (EC)	5072	NO	NO	3569	3569 (-30%)
	IIIa east; (Kattegat)	100	?	?	<i>pm</i>	130 (30%)
	VIIa	182	NO	NO	146	0 (-100%)
	IIIa west; (Skagerrak)	4171			<i>pm</i>	4808 (15%)
	IV, EU waters of IIa, IIIa not covered by Skag & Katt	29189	NO	NO	<i>pm</i>	33650 (15%)
VIIId	1701			<i>pm</i>	1961 (15%)	
Common sole	VIIa	90	YES	NO	0	0 (-100%)
	IIIa, 22-24 (EC)	205	NO	NO	<i>pm</i>	LO
	IV, IIa (EC)	11900	NO	YES	<i>pm</i>	LO
	VIIId	3483	NO	YES	<i>pm</i>	LO
	VIIe	851	YES	YES	<i>pm</i>	LO
	VIIIfg	851	NO	YES	<i>pm</i>	LO
Hake	VIIIc, IX, X, CECAF 34.1.1 (EC)	13826	NO	YES	<i>pm</i>	LO
	Overall Northern TACs (IIIa/IIa and IV/Vb, VI, VII, XII and XIV/VIIIabde)	90882	NO	?	<i>pm</i>	LO
Horse mackerel	IVb,c VIIId	15200	?	?	<i>pm</i>	15200 (0%)
	IIa, IVa; VI, VIIa-c, VIIe-k, VIIIabde; Union and int. waters of Vb; int. waters of XII and XIV	85732	YES	YES	<i>pm</i>	85732 (0%) ⁵
	VIIIc	13572			17235	13572 (0%) ⁵
Pollack	IX	59500	YES	?	68583	68583 (15%)
	Vb, VI, XII, XIV	397	?	?	397	120 (-70%)
	VII	13495			10796	4080 (-70%)
	VIIIabde	1482			1186	978 (-34%)
Skates & rays	VIIIc	231	?	?	231	152 (-34%)
	IX, X, CECAF 34.1.1 (EC)	282			282	186 (-34%)
	EC Waters of VIab, VIIa-c, VIIe-k	8032			6426	6426 (-20%)
	EC waters of VIII, IX	3420			3078	2736 (-20%)
	IIa (EC), IV - North Sea (EC)	1256	?	?	1005	1005 (-20%)
IIIa	47			38	38 (-20%)	
VIIId	798			638	638 (-20%)	

¹ Any grouped rows of ICES F and B values represent a single assessment area overlapping a group of management areas. In addition, all management areas for anglerfish and skates & rays represent multiple species grouped under a single TAC. "?" indicates that ICES could not provide reference values due to data limitations. See text for more details.

² Commission proposed TACs, in tonnes. **Bold** TACs are multiple-year rollovers according to the 'Joint Statement by the Council and the Commission' (Council doc. 5232/14). TACs listed as "*pm*" (*pro memoria*) represent those for which the Commission was unable to propose a TAC by the time of the proposal's publication.

³ Our recommended TACs, in tonnes, in line with ICES advice (% change from 2015 Council TAC in brackets). "LO" represents a stock partially covered by the landing obligation, for which a total TAC recommendation cannot be calculated based on ICES advice alone. See text for more details on these stocks.

⁴ Due to management and assessment area mismatch, and that both anglerfish species *L. budegassa* (*L.b.*) and *L. piscatorius* (*L.p.*) are included under multiple TACs, we are unable to propose a TAC for the management areas VII and VIIIabde. For the remaining management area, we recommend separate TACs for the two anglerfish species.

⁵ We recommend a rollover of the 2015 TAC for this stock due to ICES estimates that increased exploitation will bring this stock below precautionary levels in 2016. Our advice is within the upper limit proposed by ICES.

ANGLERFISH

Anglerfish (*L. budegassa* and *L. piscatorius*) is managed in ICES division VIIb-k, VIIIabd, VIIIc and IXa under a combined TAC for both species. ICES reiterates its recommendation from last year that the two species should not be managed under a combined TAC and highlights that this system may lead to overexploitation of either species. Anglerfish will not be covered under the landing obligation in 2016.

While *L. budegassa* stocks in divisions VIIIc and IXa are in fair shape with fishing mortality below F_{MSY} and biomass above $MSY B_{trigger}$, no biomass reference points for the SSB of *L. piscatorius* have been defined and fishing mortality is above F_{MSY} . ICES advises for division VIIIc and IXa catches of no more than 1 070 tonnes for *L. budegasse* and 1 343 tonnes for *L. piscatorius*, resulting in combined catches for both species of no more than 2 413 tonnes.

For the remaining areas, only landings data are available with no reliable discard estimates and no biomass reference points. ICES advice is thus based on the precautionary approach and amounts to the same quantity as advised in the last two years. ICES advises for division VIIb-k and VIIIabd landings of no more than 10 757 tonnes for *L. budegassa* and 26 691 tonnes for *L. piscatorius*.

Recommendation: We urge the Council to follow the ICES recommendation to manage the two anglerfish species under different TACs to avoid overexploitation.

We further urge the Council to set TACs of no more than 10 757 tonnes for *L. budegassa* and 26 691 tonnes for *L. piscatorius* in VIIb-k and VIIIabd; and 1 070 tonnes for *L. budegasse* and 1 343 tonnes for *L. piscatorius* in areas VIIIc and IXa, following scientific advice for both species.

COD

North Atlantic cod in EU waters are in a poor state, as noted by the Commission. Biomass levels are regarded as critically low and exploitation rates above F_{MSY} . Despite this, Council TAC decisions have far exceeded scientific advice and this threatens the future potential of the fisheries.

The Spawning Stock Biomass (SSB) of all cod stocks covered by the proposal COM (2015) 559 are below ICES precautionary levels where levels exist, or are in an uncertain state regarding their assessment. The most depleted cod stocks in need of recovery include Rockall division VIb, Faroe Bank division Vb2, Irish Sea division VIIa, and West of Scotland division VIa. The Faroe Plateau division Vb1 stock and Southern Celtic Seas division VIIb, e-k stock are also near B_{LIM} , which is the biomass reference point below which stocks are at serious risk of recruitment failure and collapse. Only one stock in the North Sea, including Skagerrak and Eastern English Channel subarea IV and divisions IIa, IIIa west and VIId, shows positive growth towards reaching safe biological limits by 2017. Whilst the Kattegat stock, division IIIa east shows increases in biomass from its 2009 historic low, no clear reference levels exist.

We applaud the Council's commitment to maintaining fishery closures for certain areas and we encourage continued discipline while these stocks recover to biomass levels capable of providing maximum sustainable yield.

Recommendation: For the cod stock in Rockall division VIb, we urge the Council to follow scientific advice and reduce the TAC to no more than 16 tonnes, and implement additional measures in order to minimize the bycatch of cod. This stock should be removed from the list of 'stable stocks' with multiannual rollover TAC.

Recommendation: We ask the Council to close or maintain closures of cod fisheries, both where targeted and as bycatch, in the divisions associated with the Irish Sea, West of Scotland, Faroe Banks and Faroe Plateau. For Cod in Kattegat, division IIIa east, we ask Council to increase the TAC to 130 tonnes.

Mixed fisheries impacting cod

Fisheries landing a mix of target species are known as mixed fisheries. The predominance of demersal trawlers in EU waters, which have relatively poor selectivity, is a strong incentive to shift toward the more complex mode of mixed fisheries management.

Due to the variety of species captured in these fisheries, and in a move toward more comprehensive ecosystems-based management, ICES provides mixed fisheries advice for 2016 impacting two cod stocks, including the North Sea, Skagerrak and Eastern English Channel as one area, and for the first time this year the Southern Celtic Sea. We support the development of mixed fisheries advice, emphasise the need to analyse species interactions in detail, and encourage Council to consider the impact on different stocks across fleet segments as reflected in this advice. In particular we urge Council to ensure that the total removals associated with TAC setting in the mixed fisheries maintain exploitation rates for all stocks below F_{MSY} as required by the CFP.

Under the existing predominant gear selectivity patterns in these areas, capturing the quotas of some stocks will limit the opportunity for continued harvest of others. Improving gear selectivity on the whole, especially for these most limiting stocks (choke species), would help increase the opportunity to continue harvesting stocks with greater abundance.

Cod in VIIbce-k, VIII, IX, X, and CECAF 34.1.1 (EC waters) (Southern Celtic Sea)

In the Southern Celtic Sea, cod biomass is currently below precautionary levels and is being overfished with an exploitation rate over both F_{MSY} and F_{PA} , which is a precautionary level beyond which fishing effort risks bringing a stock to recruitment failure. ICES provides mixed fishery advice for Southern Celtic Sea divisions VIIbce-k, which must be applied to the total management area for this stock into subareas VIII, IX, X, and CECAF 34.1.1 (EC waters). The landing obligation also applies to whiting in this area starting on 1 January 2016 if the combined landings of cod, haddock, saithe, and whiting represent 25% or more of the total landings.

Under the existing selectivity patterns in the Southern Celtic Sea, cod harvests will be the most limiting stock in the mixed gadoid fisheries. Due to high variability in cod discarding and in absence of the landing obligation, ICES advice directly corresponds to landings and a cod TAC of 3 569 tonnes.

Recommendation: We urge the Council to follow ICES advice and adopt a TAC for the Southern Celtic Seas of no more than 3 569 tonnes.

Cod in IV, IIa, IIIa, and VIId (North Sea including Skagerrak and Eastern English Channel)

There is potential for North Sea cod to be a successfully managed stock in the coming years, if the stock is allowed to rebuild. Currently, North Sea cod biomass is under the precautionary reference point B_{PA} , yet under a sustainable harvest and continued growth should reach a biomass above $MSY B_{trigger}$, equal to B_{PA} , by 2017.

Due to the low biomass, ICES has scaled its advice accordingly to below F_{MSY} to allow for continued stock rebuilding. The new revision of the stock assessment for North Sea cod does not show an increase in total stock biomass, but an increase in the numbers of mature fish, because the fact that the fish mature at younger ages is now incorporated into the assessment. These younger fish, while part of the SSB, are not as productive as newly spawning fish in the past and should be allowed to reach greater size and age before harvest.

While ICES provides advice on this stock across its range, three management areas cover the stock in the divisions associated with the North Sea, Skagerrak, and Eastern English Channel. Until the landing obligation is enforced for cod in the North Sea, the final TAC must correspond with ICES estimates of 'wanted catch' only, anticipating discards at the current rate (18%). The corresponding total TAC for the three management areas is 40 419 tonnes. Dividing this total between the North Sea, Skagerrak, and Eastern English Channel at the rate used since 2009 results in 83%, 12%, and 5% of the total TAC, respectively, including both EU and Norwegian portions.

Under the existing selectivity patterns in the mixed demersal fisheries in these areas, harvests of whiting and Eastern Channel sole will be the limiting stocks to further demersal exploitation. Unless fisheries targeting cod modify their behaviour and gear to better select for cod alone, then much of the cod TAC will be unfished. However, fishing cod at a rate well under F_{MSY} will allow more rapid stock rebuilding from the limited available recruitment, leading to greater catch rates of cod and improved recruitment in the future.

Recommendation: We urge the Council to adopt the following TACs for cod corresponding to ICES advice, which include both EU and Norwegian portions of the quota: for the North Sea no more than 33 650 tonnes, for Skagerrak no more than 4 808 tonnes, and for the Eastern English Channel no more than 1 961 tonnes.

COMMON SOLE

The Council will set TACs for sole in almost all areas of the North-East Atlantic and the North Sea. Equally, all three joint recommendations on the landing obligation provided by the respective regional Member State groups contain provisions to include certain sole fisheries under the landing obligation apart from the Irish Sea division VIIa. In recent years the Council has set common sole TACs in excess of scientific advice, resulting in a decline of the stocks and causing problems for both the ecosystem and dependent fisheries. Several common sole stocks are now at risk of impaired recruitment and collapse.

Common sole in VIIa (Irish Sea)

Despite a reduction in fishing mortality to levels below F_{MSY} , Irish Sea common sole biomass has remained below B_{LIM} , which is the biomass reference point below which stocks are at serious risk of recruitment failure and collapse, since 2005. Recruitment is also the lowest in the time series. ICES advises closing the targeted fishery and minimising all bycatch. Since 2013 the Council has not followed the scientific advice and consistently set a 90 tonnes TAC. We support the Commission's proposal to close this fishery for 2016 so that this stock may finally begin to rebuild.

Recommendation: We urge the Council to follow the scientific advice and the Commission's proposal to close the fishery of common sole in division VIIa.

Common sole in IIIa and 22-24 (Skagerrak, Kattegat and Western Baltic Sea)

For common sole in Skagerrak, Kattegat and the Western Baltic Sea overfishing has increased for several years and is now close to F_{PA} , resulting in a strong decline of the stock since 2004 to levels at which the stock is in serious risk of recruitment failure and collapse (B_{LIM}). Recruitment has decreased since 2008 and is now at historically low levels. ICES advises catches of no more than 93 tonnes following the MSY approach.

Common sole in IV (North Sea)

Despite a decreasing fishing mortality, the common sole stock in the North Sea is still being overfished with a fishing mortality above F_{MSY} , while the biomass has fluctuated around MSY $B_{trigger}$, equal to B_{PA} , and is currently above this precautionary level. Council has followed the proposed scientific advice according to a

management plan since 2010. ICES previously evaluated the plan and considered it precautionary. From 2016 on, ICES advises catches following the second stage of the management plan and assumes that harvesting the stock with the newest estimate of F_{MSY} is in accordance with stage two.

Common sole in VIId (Eastern English Channel)

Overfishing for common sole in division VIId has increased strongly in recent years reaching F_{LIM} , which in the long term will result in a stock at risk of recruitment failure and collapse. Coupled with low recruitment in 2012 and 2013, overfishing has caused the biomass to decline to the levels of $MSY B_{trigger}$ (equal to B_{PA} for this stock). This overfishing was caused directly by setting the TAC above scientific advice since 2014. This year, ICES advises catches of 2 685 tonnes following the MSY approach.

Common sole in VIle (Western English Channel)

The common sole stock in VIle has been in good shape for several years, with fishing mortality below F_{MSY} since 2009 and biomass above $MSY B_{trigger}$ for several decades. It was highlighted by the Commission as a positive example in its 2014 Communication,⁷ showing that stock size has increased by 16% and catches by 24% in the period 2009 to 2013. ICES advises a further increase in catches to no more than 1 226 tonnes and assumes all catches to be landed.

Common sole in VIIfg (Bristol Channel and Celtic Sea)

Common sole in the Bristol Channel and the Celtic Sea is being overfished and fishing mortality increased above F_{PA} . The biomass is declining steadily as a result, although still above $MSY B_{trigger}$, equal to B_{PA} for this stock. Council has not followed scientific advice when setting the TAC since 2014. For 2016, ICES advises catches of no more than 760 tonnes following the MSY approach.

Common sole in VIllab (Northern and Central Bay of Biscay)

For common sole in division VIllab fishing mortality is above the precautionary fishing mortality reference point F_{PA} and biomass is below $MSY B_{trigger}$, which equals the precautionary biomass reference point B_{PA} for this stock. In 2013 the stock was considered to be in a stronger state and was above $MSY B_{trigger}$. Sadly, continued Council action setting TACs above scientific advice has caused the stock to decline below precautionary levels. For 2016, ICES recommends catches of no more than 2 393 tonnes following the MSY approach.

Recommendation: For all sole fisheries, apart from VIIa (Irish Sea) where ICES advises to close the fishery, we urge the Council to follow our general considerations when setting TACs for stocks that are partially covered by the landing obligation, as outlined above.

HAKE

Southern hake in VIllc and IXa

The Southern hake stock is being seriously overfished with a fishing mortality of 0.73 (F_{MSY} is 0.24), and the stock is in a poor state with a biomass of 16 443 tonnes, only just above B_{LIM} . If Council wishes to improve both the health of the stock and the socio-economic conditions for the fisheries then urgent change is required.

Member States put forward a joint recommendation for a discard plan including Southern hake that the Commission has transposed into a delegated act (COM (2015) 6835). Regrettably, not all fisheries and fleets targeting the stock are covered under this discard plan, which complicates the calculation of the final TAC.

A management plan had been agreed in 2005 with the aim to rebuild the stock to safe biological limits and reduce fishing mortality by 2016. The intent was a biomass recovery to above 35 000 tonnes and a reduction in the fishing mortality rate to 0.27. This plan has not been evaluated by ICES thus cannot be used as the advice basis.

On the basis of the MSY approach ICES advises that catches should be no more than 6 078 tonnes, a 62% reduction of the TAC set in 2015. In 2015, like in the previous two years, management decisions for this stock have not followed scientific advice. The TAC decision for 2015 was more than 5 000 tonnes above scientific advice. Ignoring the advice has necessitated bigger advised cuts due to continuing stock decline.

The Commission is managing these divisions (VIIIc and IXa) together with division X and EU waters of CECAF 34.1.1. In the latter two divisions only 200–300 tonnes are likely to be caught.

Recommendation: For Southern hake stocks, we urge the Council to set TACs following our general considerations for stocks that are partially covered by the landing obligation, as outlined above.

Northern hake in IV, VI, VII, VIIIabd, and IIIa

The status of the Northern hake stock has improved substantially in recent years and now has a biomass level above $MSY B_{trigger}$, due to substantial reductions in fishing mortality. However the stock is still being overfished as fishing mortality has remained above F_{MSY} since the beginning of the time series ICES provides. As for southern hake, Member States submitted a joint recommendation for a discard plan including Northern hake that the Commission has transposed into a delegated act (COM (2015) 6833). Once again, not all fisheries and fleets targeting this stock are covered under the new discard plan, which complicates calculation of the final TAC.

ICES advises on the basis of the MSY approach that total catches should not be more than 109 592 tonnes. For 2015 the Council did not follow scientific advice and set the Northern hake TAC 12 000 tonnes above advice. Fishing mortality should be set below F_{MSY} to adhere to the CFP objectives.

Recommendation: For Northern hake stocks, we urge the Council to set TACs following our general considerations for stocks that are partially covered by the landing obligation, as outlined above.

HORSE MACKEREL

There are three horse mackerel stocks for which ICES provides advice. For subarea VIII and divisions IIa, IVa, Vb, VIa, and VIIa–c, e–k (Northeast Atlantic) and in division IXa (Atlantic Iberian Waters) fishing has taken place below F_{MSY} for a number of years. In divisions IIIa, IVb,c and VIId (Skagerrak and Kattegat, Southern and Central North Sea, Eastern English Channel), the precautionary approach has been applied as the available information is insufficient to evaluate the biomass and exploitation status. Exploitation of this stock in the Eastern English Channel represents a significantly smaller fishery than the other stocks.

Horse mackerel in VIII, IIa, IVa, Vb, VIa, and VIIa–c, e–k (Northeast Atlantic)

ICES advice for horse mackerel in the Northeast Atlantic indicates that fishing at F_{MSY} would represent a slight increase in F and correspond to a 27% TAC increase. For the stock, ICES says that ‘there is large uncertainty in the absolute estimates of SSB.’ Within this uncertainty, ICES estimates a 10% decrease in biomass, which would bring the stock below precautionary levels by 2016.

The exploitation rate has been below F_{MSY} for just over 10 years and catches have been relatively stable but declining. From 2004 to 2008 F was significantly below F_{MSY} , permitting improved growth in the stock biomass until exploitation returned to F_{MSY} reversing this growth. This suggests that fishing below ICES F_{MSY} estimate is a preferable management option for stock stability.

Due to high uncertainty, the risk of stock reduction below precautionary levels in 2016, and the failure of the existing management plan to meet precautionary considerations as noted in the advice, we recommend the exploitation rate be maintained below F_{MSY} . ICES predicts a rollover of the 2015 TAC, 99 304 tonnes, would prevent stocks from falling below $MSY B_{trigger}$ in 2016. Dividing this total between the two management areas division VIIIc and the remaining divisions associated with the Northeast Atlantic at the current rate represents 14% and 86% of total TAC, respectively, including both EU and international portions.

Recommendation: We urge the Council to adopt the following rollover TACs corresponding to ICES advice, which include both EU and International portions of the quota: for division VIIIc no more than 13 572 tonnes, and for the remainder of the divisions associated with the Northeast Atlantic stock no more than 85 732 tonnes.

Horse mackerel in IXa (Atlantic Iberian Waters)

Horse mackerel stocks in Atlantic Iberian Waters are in apparently good shape given the increasing biomass and relatively low exploitation rate. Fishing well below F_{MSY} has allowed steady catches for over 10 years. Although uncertainty is relatively high on both of these parameters, the absolute trends are still clear. In line with the MSY approach, the stock could sustain a dramatic increase in exploitation, though ICES advises a real shift to that level of exploitation from the current low level should occur in several stages to distribute exploitation among horse mackerel cohorts. The remaining increase for 2016 that is in line with scientific advice and the Commission's proposal equals a real TAC increase of 15.3%.

Recommendation: We ask the Council to adopt a TAC corresponding to ICES advice for Atlantic Iberian Waters of no more than 68 583 tonnes.

POLLACK

ICES provides advice for three pollack stocks in the North Sea, subarea IV and division IIIa, Celtic Seas & English Channel, subareas VI & VII, and Bay of Biscay & Atlantic Iberian Waters, subarea VIII & division IXa. The North Sea stock is in poor shape and has no dedicated TAC, though ICES implies landings in subarea IV should be no more than 1 300 tonnes and there should be no directed pollack fishery in division IIIa. The remaining two data-limited stocks are managed across five management areas. MSY values are unknown and undefined. Data on recreational catch is poorly estimated and thought to be considerable in the TAC managed areas.

Maintaining the current practice of quota rollovers for these economically important stocks that are in such poor condition continues to prevent any stock regrowth. It is a priority for MSY values to be defined for the stocks and that any year-on-year quota rollovers should be dependent on improvements in the health of the stock.

Due to the poor stock status and precautionary assessment, ICES advice is based on landings only. This corresponds directly to the TACs once allocated along the existing divisions. For the combined management areas in the Celtic Seas & English Channel, representing 3% and 97% respectively, ICES advises landing no more than 4 200 tonnes. For the combined management areas in the Bay of Biscay, VIIIc & Atlantic Iberian Waters, representing 74%, 12% and 14% respectively, ICES advises landing no more than 1 316 tonnes.

Recommendation: We urge the Council to adopt the following TACs corresponding to ICES advice: for the Celtic Sea, no more than 120 tonnes; for the English Channel, no more than 4 080 tonnes; for the Bay of Biscay, excluding division VIIIc, no more than 978 tonnes; for division VIIIc, no more than 152 tonnes; and for Atlantic Iberian waters, no more than 186 tonnes.

SKATES AND RAYS

All skate and ray species are managed under a combined TAC for each of their respective management units. While the status of some species is improving, most stocks are overexploited and fishing opportunities are in need of precautionary cuts to reduce fishing mortality. ICES advise zero catch for a number of dramatically depleted skate and ray species.

Moving to a system of individualised TACs would provide an incentive to improve the state of these stocks. Moreover, the involved fishing industry will be damaged if they are unable to exploit a healthy stock due to restrictions imposed on the collective outlook for the species.

The Commission has proposed 20% decreases to all combined skate and ray stocks except for those in EC waters of VIII and IX, where the Commission has proposed a 10% decrease.

Recommendation: We urge the Council to establish individual TACs for each species, or species group, based on the advice provided by ICES, and an immediate precautionary reduction of all skate and ray TACs of 20%, which is largely in line with the Commission's proposal.