

## Annex II

# Joint NGO recommendations for 2019 total allowable catches

## For selected Northeast Atlantic and North Sea stocks

December 2018

This annex contains joint NGO recommendations for Total Allowable Catches (TACs) in 2019 for selected fish stocks. This list of stocks does not aim to be comprehensive but rather to highlight cases of particular concern, for instance due to unfavourable stock status and/or excessive fishing mortality to date.

Unless otherwise stated, these joint NGO TAC recommendations refer to maximum amounts that should not be exceeded. In the context of mixed fisheries, TACs for some stocks will have to be set below these recommended limits in order not to overexploit other stocks.

All recommendations below refer to stocks for which the management area is the same or larger than the advice area<sup>1</sup>, so that TAC figures can be directly compared to the scientific advice. Mismatch issues related to the management areas and the advice areas prevent clear recommendations for other stocks of concern.<sup>2</sup>

From January 1<sup>st</sup> 2019 the landing obligation (LO) will apply fully for stocks managed through TACs. We note that the Commission's general approach to TAC proposals this year is based on scientific advice for catches with potential deductions for any *de minimis* or high survivability exemptions – i.e. permitted discards. For many stocks the proposed TAC figures are therefore not directly comparable to either the total catch or wanted catch advice. Our TAC recommendations are based on the figures corresponding to the ICES advice for total catches.

The total catch advice represents an upper limit that should only be used where no exemptions to the LO are in place and the LO is demonstrably complied with. There is potential to increase fishing mortality and overfish stocks where there is non-compliance with the LO. See section 2.1 in Annex I for our general recommendations on TAC 'adjustments' and necessary safeguard measures to ensure the sustainable management of stock when setting TACs and fully implementing the LO. Note that since the Commission's proposal involves *de minimis* deductions for some proposed TACs, these values are not directly comparable to our recommendations, which explicitly do not attempt to quantify such deductions, since the relevant calculations and data used by the Commission are not publicly available at the time of writing. However, an asterisk in the NGO TAC recommendation column indicates stocks subject to *de minimis* exemptions in 2019 for which such deductions will need to be made.

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<sup>1</sup> TAC areas are often larger than the area covered by the corresponding ICES advice in order to avoid misreporting of catches as taken in areas without TAC.

<sup>2</sup> For example, the two whiting stocks in the West of Scotland (VIa) and Rockall (VIb) are managed under one combined TAC (WHG/56-14), which prevents a stock-specific TAC recommendation and does not ensure sustainable exploitation of both stocks. ICES has been advising zero catches for the West of Scotland stock since 2006 and the Commission's proposal for 2019 follows this (though it has proposed an additional new Union-level bycatch TAC), but in previous years a bycatch-TAC has been set for both stocks combined.

Species, fishing area and TAC code	Advice basis and stock status/trends	2019 ICES advice in tonnes	2018 TAC excluding top-up in tonnes	2019 EC proposal in tonnes <sup>4</sup>	2019 NGO recommendation excluding top-up in tonnes	Technical observations
			(+ top-up in tonnes <sup>3</sup> )	(% change vs. 2018 TAC)	(% change vs. 2018 TAC <sup>5</sup> )	
<b>Cod in <a href="#">Kattegat (COD/03AS)</a></b>	Advice basis: - Precautionary Approach Stock status/trends: - No reference points - F decreasing - SSB decreasing	Total catch: 494 Wanted catch: No advice	630 (no top-up specified)	476 (-24%)	≤494 (-22%, based on catch advice, and assuming full compliance with the LO can be demonstrated).*	Recruitment in the last four years has been below average. Stock size is approaching historically low levels in 2018. High unallocated removals.
<b>Cod in <a href="#">Vla</a>, EU &amp; int. waters Vb (E) (COD/5BE6A + COD-BC/5BE6A)</b>	Advice basis: - MSY approach Stock status/trends: - $F > F_{lim}$ - $SSB < B_{lim}$	Total catch: 0 Wanted catch: 0	0 (but a bycatch allowance of 1.5% of total catch per trip)	1396 “bycatch TAC”	0 (0%) – but see section 2.3 of Annex I for position on “bycatch TACs”.	Recruitment has been low since 2001. Fishing mortality has been above $F_{lim}$ for most of the time-series. SSB has been below $B_{lim}$ since 1997.
<b>Cod in <a href="#">Vlb</a>, EU &amp; int. waters Vb (W) (COD/5W6-14)</b>	Advice basis: - Precautionary Approach Stock status/trends: - No reference points - F trend unknown - SSB trend unknown	Total catch: 14 Wanted catch: No advice	74	74 (0%)	≤14 (-81%, based on catch advice, and assuming full compliance with the LO can be demonstrated).	Landings were on average over 1000 tonnes for most years earlier in the time-series and have declined to less than 100 tonnes since 2002. The available information suggests that the stock may be depleted.

<sup>3</sup> TAC top-up (‘adjustment’) are based on best available information from Council Working Party non-papers ST 14915 2017 (24 November) and ST 15422 2017 (5 December): *Updates to Commission proposal COM(2017) 645 for a Council Regulation fixing for 2018 the fishing opportunities for certain fish stocks and groups of fish stocks, applicable in Union waters and, for Union vessels, in certain non-Union waters.*

<sup>4</sup> Figures based in original proposal COM(2018) 732, Proposal for a Council Regulation fixing for 2019 the fishing opportunities for certain fish stocks and groups of fish stocks, applicable in Union waters and, for Union fishing vessels, in certain non-Union waters. [Articles](#), [Annex I](#), [Annex II-VIII](#). For certain stocks, no proposal has been published – these are marked in the Commission proposal as *pm* (pro memoria). Note that the Commission’s proposal is based on full catch advice minus potential exemption quantities, and no information on the calculation of quota adjustments are provided. The % change is provided based on the comparison of the TAC proposal vs. the full TAC 2018 (including top-up).

<sup>5</sup> The % change is provided for comparison of our maximum TAC recommendation assuming full compliance with the LO can be demonstrated, versus the total TAC set in 2018 (including top-up).

<b>Cod</b> in <a href="#">VIII-k</a> , VIIbc, VIII-X, CECAF 34.1.1.1 <b>(COD/7XAD34 + COD-BC/7XAD34)</b>	Advice basis: - MSY approach Stock status/trends: - $F > F_{PA}$ - $SSB < B_{lim}$	Total catch: 0 Wanted catch: 0	3076	0 ( <i>pm</i> "bycatch TAC")	0 (-100%) – but see section 2.3 of Annex I for position on "bycatch TACs".*	Recruitment is below average and has been highly variable over time. Fishing mortality has been above $F_{MSY}$ for the entire time-series but has been decreasing since 2014. SSB has been below $B_{lim}$ for most years since 2004.
<b>Haddock</b> in <a href="#">VIIb-k</a> , VIII, IX, X, CECAF <b>(HAD/7X7A34)</b>	Advice basis: - MSY approach Stock status/trends: - $F_{PA} > F > F_{MSY}$ - $SSB > MSY B_{trigger}$	Total catch: 6317 Wanted catch: 3761	6910	5937 (-14%)	$\leq 6317$ (-9%, based on catch advice, and assuming full compliance with the LO can be demonstrated).*	Recruitment in 2017 was below average and among the lowest estimated. Fishing mortality has been above $F_{MSY}$ for the entire time-series. SSB has declined since 2011 but is above $MSY B_{trigger}$ .
<b>Hake</b> in <a href="#">VIIIc</a> , <a href="#">IXa</a> <b>(HKE/8C3411)</b>	Advice basis: - MSY approach Stock status/trends: - $F_{PA} > F > F_{MSY}$ - $SSB > MSY B_{trigger}$	Total catch: 8281 Wanted catch: 7220	8478 (+780) <sup>6</sup>	7963 (-14%)	$\leq 8281$ (-11%, based on catch advice, and assuming full compliance with the LO can be demonstrated).*	Recruitment is close to the historical average. Fishing mortality is decreasing although is above $F_{MSY}$ , but below $F_{pa}$ . The SSB has increased since 1998 and has been above $MSY B_{trigger}$ since 2007.
<b>Herring</b> in <a href="#">VIIa</a> , <a href="#">VIIg-h</a> , <a href="#">VIIj-k</a> <b>(HER/7G-K.)</b>	Advice basis: - MSY approach Stock status/trends: - $F_{lim} > F > F_{PA}$ - $MSY B_{trigger} \& B_{PA} > SSB > B_{lim}$	Total catch: 4742 Wanted catch: No advice	10127	4742 (-53%)	$\leq 4742$ (-53%, based on catch advice, and assuming full compliance with the LO can be demonstrated).	Below average recruitment since 2013. Fishing mortality has increased since 2008 and has been above $F_{MSY}$ since 2015. SSB has been decreasing significantly since its peak in 2011 and is now below $MSY B_{trigger}$ , near $B_{lim}$ .

<sup>6</sup> Note that according to the relevant Commission non-paper (ST 14915 (2017)), the Commission proposed a top-up of 9.21% applied to a proposed pre-top-up TAC of 7366 t (based on wanted catch advice), resulting in a proposed top-up of 678 t. However, the agreed overall TAC of 9258 t exceeded the resulting total proposed TAC of 8045 t. The agreed pre-top-up TAC presented here was calculated using the proposed 9.21%:  $9258/1.092 = 8478$ , which in turn means an agreed top-up of  $9258-8478 = 780$  t.

<p><b>Herring in <a href="#">Vla North &amp; South, VIIbc</a> (HER/6AS7BC &amp; HER/5B6ANB)</b></p>	<p>Advice basis:</p> <ul style="list-style-type: none"> <li>- MSY approach</li> </ul> <p>Stock status/trends:</p> <ul style="list-style-type: none"> <li>- <math>F &lt; F_{MSY}</math></li> <li>- <math>SSB &lt; B_{lim}</math></li> </ul>	<p>Total catch: 0 Wanted catch: 0</p>	<p>1630 + 4170 = 5800</p>	<p>1630 + 4170 5800 (0%)</p>	<p>0 (-100%)</p> <p>In line with <a href="#">ICES response to the EU request to evaluate the proposed recovery plan</a>, any monitoring TAC should be reduced to match the maximum F following from the ICES MSY rule.</p>	<p>ICES advise a stock recovery plan for these combined stocks. Recruitment has been at unprecedented low levels since 2013. Fishing mortality has been below <math>F_{MSY}</math> since the late 1990s. SSB has been declining since 2004 and is estimated to have been below <math>B_{lim}</math> since 2013. No ICES catch options predicted to result in <math>SSB &gt; B_{lim}</math> by 2020. A roll-over of the '2018 monitoring TAC' is expected to further reduce the SSB.</p>
<p><b>Plaice in <a href="#">VIIh-k</a> (PLE/7HJK + PLE-BC/7HJK)</b></p>	<p>Advice basis:</p> <ul style="list-style-type: none"> <li>- Precautionary Approach (MSY proxy)</li> </ul> <p>Stock status/trends:</p> <ul style="list-style-type: none"> <li>- <math>F &gt; F_{lim}</math> proxy</li> <li>- <math>SSB &lt; B_{lim}</math> proxy</li> </ul>	<p>Total catch: 0 Wanted catch: 0</p>	<p>128</p>	<p>90 (-30%) "bycatch TAC"</p>	<p>0 (-100%) – but see section 2.3 of Annex I for position on "bycatch TACs".</p>	<p>Recruitment at low level since 2013. Fishing mortality has been above <math>F_{lim}</math> for the entire time-series. SSB has been below <math>B_{lim}</math> since 2002.</p>
<p><b>Sole in <a href="#">VIIa</a> (SOL/07A.)</b></p>	<p>Advice basis:</p> <ul style="list-style-type: none"> <li>- MSY approach</li> </ul> <p>Stock status/trends:</p> <ul style="list-style-type: none"> <li>- <math>F &lt; F_{MSY}</math></li> <li>- <math>SSB &lt; B_{lim}</math></li> </ul>	<p>Total catch: 414 Wanted catch: 395</p>	<p>40</p>	<p>414 (+935%)</p>	<p><math>\leq 414</math> (+935%, based on catch advice, and assuming full compliance with the LO can be demonstrated).</p>	<p>Recruitments in 2015 and 2016 were above recent average. Fishing mortality is presently well below <math>F_{MSY}</math> and close to zero. SSB has been increasing since 2014, but still below <math>B_{lim}</math>.</p>
<p><b>Sole in <a href="#">VIIbc</a> (SOL/7BC.)</b></p>	<p>Advice basis:</p> <ul style="list-style-type: none"> <li>- Precautionary Approach</li> </ul> <p>Stock status/trends:</p> <ul style="list-style-type: none"> <li>- No reference points</li> <li>- F trend unknown</li> <li>- SSB trend unknown</li> </ul>	<p>Total catch: 24 Wanted catch: 24</p>	<p>42</p>	<p>42 (0%)</p>	<p><math>\leq 24</math> (-43%, based on catch advice, and assuming full compliance with the LO can be demonstrated).</p>	<p>No top-up because catch advice = landings advice.</p>

<b>Sole</b> in <a href="#">VIIhjk</a> <b>(SOL/7HJK.)</b>	Advice basis: - Precautionary Approach (MSY proxy) Stock status/trends: - $F < F_{MSY}$ proxy - $SSB > MSY B_{trigger}$ proxy	Total catch: 311 Wanted catch: 311 (discard rate negligible)	382	382 (0%)	$\leq 311$ (-19%, based on catch advice, and assuming full compliance with the LO can be demonstrated).*	Recruitment has fluctuated without trend over the time-series. Fishing mortality has been around $F_{MSY}$ over the last decade and is currently estimated to be below $F_{MSY}$ . SSB shows an increasing trend since the mid-2000s and has been above $MSY B_{trigger}$ since 2015.
<b>Sprat</b> in <a href="#">VIIde</a> <b>(SPR/7DE.)</b>	Advice basis: - Precautionary Approach Stock status/trends: - No reference points - Harvest rate decreasing - Biomass increasing	Total catch: 1883 Wanted catch: 1883 (discard rate negligible)	3296	2637 (-20%)	$\leq 1883$ (-43%, based on catch advice, and assuming full compliance with the LO can be demonstrated).	In 2017 the biomass index increased compared to the 2016 estimate, but it is still less than half the biomass estimated between 2013 and 2015.
<b>Whiting</b> in <a href="#">VIIa</a> <b>(WHG/07A. + WHG-BC/07A.)</b>	Advice basis: - MSY approach Stock status/trends: - $F > F_{lim}$ - $SSB < B_{lim}$	Total catch: 0 Wanted catch: 0	80	612 (+665%) "bycatch TAC"	0 (-100%) – but see section 2.3 of Annex I for position on "bycatch TACs".	Recruitment has been low since the early 1990s. Fishing mortality has been above $F_{lim}$ for the entire time-series. SSB has been declining and has been well below $B_{lim}$ since the mid-1990s.
<b>Whiting</b> in <a href="#">VIII &amp; IX</a> <b>(WHG/08.)</b>	Advice basis: - Precautionary Approach Stock status/trends: - No reference points - F trend unknown - SSB trend unknown	Total catch: No advice Wanted catch: 1613	2540 (0%)	2540 (0%)	$\leq 1613$ (-36%, based on wanted catch advice, and assuming full compliance with the LO can be demonstrated).	Landings have been reasonably stable over the time period. For the fleets for which discard data are available, discarding is substantial (well above 5%).

\* Stocks for which a *de minimis* exemption will be in place in 2019 according to the relevant demersal discard plans for the North Sea, North Western Waters or South Western Waters. In these cases *de minimis* deductions need to be applied to the TAC based on catch advice in order to account for continued discarding under *de minimis* exemption, but we do not attempt to quantify the extent of these deductions in our recommendations, since the necessary information is not publicly available at the time of writing.