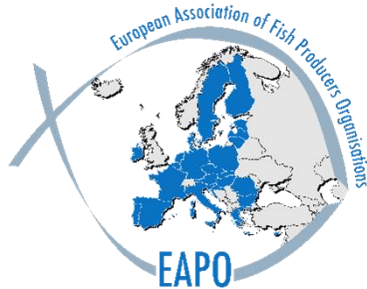


## European Association of Fish Producers Organisations

## Association Européenne des Organisations de Producteurs dans le secteur de la pêche



**EAPO / AEOP**

**H. Baelskaai 20 – 8400 OOSTENDE (Belgium)**

**Tel: +32 59 43 20 05**

**e-mail: [info@eapo.com](mailto:info@eapo.com)**

**website: [www.eapo.com](http://www.eapo.com)**

EAPO23-62

Oostende, 16 November 2023

EU Transparency Register number: 46491656228-65

---

### Position paper by e-mail attachment to:

- **Mr. Virginijus SINKEVIČIUS:** European Commissioner for Environment, Oceans & Fisheries ([cab-sinkevicius-contact@ec.europa.eu](mailto:cab-sinkevicius-contact@ec.europa.eu))

### CC:

- **Ms. Eva CARBALLEIRA:** DG MARE, head of Unit C5 ([Eva-Maria.CARBALLEIRA-FERNANDEZ@ec.europa.eu](mailto:Eva-Maria.CARBALLEIRA-FERNANDEZ@ec.europa.eu))

---

Cod (*Gadus morhua*) in Subarea 4, divisions 6.a and 7.d, and Subdivision 20 (North Sea, West of Scotland, eastern English Channel, and Skagerrak)  
-Comments to the ICES cod-advice published 19th of September 2023-

## Background

The ICES Benchmark Workshop on Northern Shelf Cod Stocks (WKBCOD) in 2023 led to the amalgamation of former North Sea (cod.27.47d20) and West of Scotland (cod.27.6a) cod stocks. This decision stemmed from evidence identified in the 2015 Benchmark Workshop on North Sea Stocks<sup>1</sup>, highlighting two cod populations in the North Sea. Despite challenges in assessing individual populations, subsequent efforts, including the 2020 Workshop on the Stock Identification of North Sea Cod (WKNSCodID<sup>2</sup>), the 2021

---

<sup>1</sup> ICES. 2015. Report of the Benchmark Workshop on North Sea Stocks (WKNSEA), 2–6 February 2015, Co-penhagen, Denmark. ICES CM 2015/ACOM: 32.

<sup>2</sup> ICES. 2020. Workshop on Stock Identification of North Sea Cod (WKNSCodID). ICES Scientific Reports. 2:89. 82 pp. <http://doi.org/10.17895/ices.pub.7499>

Benchmark Workshop on North Sea Stocks (WKNSEA)<sup>3</sup> and the Workshop on Stock Identification of West of Scotland Sea Cod (WK6aCodID<sup>4</sup>) in 2022, refined stock definitions. The 2023 benchmark established three new substocks with distinct characteristics. While spawning segregation is assumed in quarter 1, uncertainties in mixing outside the spawning season remain. ICES advises a precautionary approach, proposing catch scenarios for all three substocks and suggesting a uniform reduction in fishing opportunities across them.

## ICES advice

This new North Sea cod assessment relates to sub-stocks of cod in the North Sea (Subarea 4), West of Scotland (Division 6.a), the Skagerrak (Subdivision 20), and the eastern English Channel (Division 7.d). This assessment is presented as a benchmarked assessment based on the revised assessment protocol specified by the 2023 meeting of ICES WKBCOD (2023). The primary changes consisted of updating the stock definition to combine the previous North Sea and West of Scotland cod stocks and the use of a new assessment model (multistock SAM) to explicitly account for sub-stock dynamics.

ICES's advice highlights that after 2 regime shifts before 2000, in the North Sea, cod SSB for all three substocks stabilized and increased over recent years. By 2024, the biomass of the Southern stock will have increased more than five-fold from 2020 while those of the Viking and Northwestern stocks will have doubled. Fishing pressure on all three sub-stocks will have decreased significantly over the same period.

The Northwestern sub-stock SSB is above  $MSY B_{trigger}$ , and the Viking stock is set to be above  $B_{trigger}$  by 2024. The Southern component whilst below Blim currently, will grow to be above Blim during 2024 and will be above Blim in 2025 if the catch on that component is kept lower than 9,235 tonnes.

These elements led ICES to suggest an alternative precautionary approach, to implement the relative fishing mortality reductions required for the southern sub-stock to the Viking and north-western sub-stocks as well.

This approach sets the TAC for cod in the North Sea to 22,691 tonnes for 2024 instead of 34 120 tonnes if a differentiated approach had been carried out. This is since ICES considers<sup>5</sup> it to be impossible to distinguish which of the substocks is caught. Moreover, ICES considers these substocks to be isolated during spawning season and to mix throughout the rest of the year.

## EAPO Position

First of all, EAPO members wish to highlight the importance of translating increases of SSB into increased TAC. This is of utmost importance for stocks that are caught as part of a mixed fisheries, as this would otherwise increase the risk of creating a choke species.

---

<sup>3</sup> ICES. 2021. Benchmark Workshop on North Sea Stocks (WKNSEA). ICES Scientific Reports. 3:25. 756 pp. <https://doi.org/10.17895/ices.pub.7922>

<sup>4</sup> Stemming from WKNSCodID, ICES. 2022. Workshop in Stock Identification of West of Scotland Sea Cod (WK6aCodID; outputs from 2021 meeting). ICES Scientific Reports. 4:5. 24 pp. <http://doi.org/10.17895/ices.pub.10031>

<sup>5</sup> <https://www.ices.dk/news-and-events/news-archive/news/Pages/NScod23.aspx>

In the case of North Sea Cod, now Northwestern, Southern and Viking Cod, ICES's 2020 WKNSCodID<sup>6</sup> highlighted the lack of mixing between the southern and northwestern substocks of North Sea cod. This lack of mixing can justify a different TAC setting between the southern sub-stock and the others. For EAPO members this is sufficient justification to set up the following approach:

Stock	MSY Approach	Total Catch (2024)	F <sub>total</sub> (2024)	SSB (2025)	% SSB Change
Southern	$F = F_{MSY} \times SSB(2024) / MSYB_{trigger}$	3,922	0.182	27,170	+84%
Viking	$F = F_{MSY}$	8,818	0.196	27,939	+41%
Northwestern	$F = F_{MSY}$	21,380	0.223	97,176	+35%
Total		34,120		152,285	+43%

The application of the MSY approach for all three substocks will ensure that the difference between what the 2024 TAC should have been and what it is can be mitigated. According to internal analysis, the difference between both approaches has been estimated to be 11,429 tonnes which in monetary terms relates to around 46 M€<sup>7</sup> losses of income.

ICES's advice for cod in the Northern shelf demonstrates that all three sub stocks will be above Blim in 2024. As such, EAPO members are of the opinion that there is no basis for maintaining extraordinary management measures as included in the 2023 TAC and Quota regulation. However, EU fishers also agree that protecting spawning areas may play a key role in improving the state of North Sea Cod. EAPO members would therefore like to inform the Commission that they support the closures on cod spawning grounds to be continued in 2024. In any case, additional constraining measures would not be acceptable nor legitimate.

EAPO members express a need to address key concerns highlighted in ICES's benchmark on North Sea cod. They stress the importance of further work on stock identity, specifically understanding the boundaries of the three substocks and linking commercial catches to their respective substocks. Drawing inspiration from the successful herring genetic stock identification project<sup>8</sup>, EAPO recommends that ICES follow a similar approach. This involves developing genetic tools and comprehensive sampling programs, as demonstrated in the herring project. EAPO believes that adopting this strategy will provide essential data for realigning stock areas and separating survey and catch indices. Furthermore, in line with the herring genetic stock identification model, EAPO suggests extending this approach to better comprehend sub-stock mixing in quarters 2 to 4, representing a significant step forward in advancing knowledge and management of North Sea cod.

<sup>6</sup> <https://www.ices.dk/community/groups/Pages/WKNSCodID.aspx>

<sup>7</sup> It is estimated that cod is sold at an average of €4 per kilogram.

<sup>8</sup> Farrell ED, Andersson L, Bekkevold D, Campbell N, Carlsson J, et al. 2022. A baseline for the genetic stock identification of Atlantic herring, *Clupea harengus*, in ICES Divisions 6.a, 7.b-c. *R Soc Open Sci* 9: 220453  
Farrell, E.D., Campbell, N., Carlsson, J., Egan, A., Gras, M., Lusseau, S.M., Nolan, C., O'Connell, S., O'Malley, M., and White, E. 2021 Herring in Divisions 6.a, 7.b and 7.c: Scientific Assessment of the Identity of the Southern and Northern Stocks through Genetic and Morphometric Analysis. Service Contract EASME/EMFF/2017/1.3.2.1/SI2.767459. DOI: 10.2826/208498

## Conclusion

EAPO members ask that the MSY approach be used to set up the 2024 fishing opportunities on NS cod. This would mean setting the TAC for 2024 at 34,120 tonnes (3,922 for the southern sub-stock, 8,818 for the Viking sub-stock and 21,380 for the Northwestern sub-stock). This approach would guarantee a balance between ensuring an increase in SSB for 2024 & 2025 and limiting fishers' loss of income.

On a final note, the inclusion of the sub-stock approach will lead to discussions about quota distribution. The inclusion of Scottish and Shetland waters through the northwestern stock could lead to some difficulties in sharing discussions. As this discussion cannot find common agreement amongst the members of EAPO, the matter is not further dealt with in this advice.

Thank you for your time and consideration,

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'ESBEN SVDRUP-JENSEN', written in a cursive style.

Esben Sverdrup-Jensen

President EAPO