

Northern Fishing Alliance - Cod Group

Ann Kristin Westberg
Deputy Director General
Chief Negotiator
Ministry of Industry, Trade and Fisheries
Oslo
Norway

July 22nd, 2022

North Sea Cod

Dear Ann Kristin,

The Northern Fishing Alliance, Cod Group met recently to discuss the latest ICES' advice on North Sea cod and related issues. The group is clearly encouraged that the advice points to an increase in TAC of 44%, although we view the increase as a step in the right direction with more steps to come. There is no doubt that this upward adjustment is starting to reflect what the fishermen are seeing on the fishing grounds.

A number of indicators support our position. The most fundamental of those is the increasing abundance of all sizes of cod being encountered by the fishermen, a clear indication that the biomass is not dominated by any single year-class. Important however, is the fact that cod are now being caught in areas where they have been absent in many years recently, including inshore waters.

It is our belief that the Q3, IBTS will provide data that may well justify an even larger increase in the cod TAC. However, it is our understanding that ICES's own protocols would prevent a reopening of the advice on the basis that the current assessment of the biomass lies below the Blim reference point. This would mean the most recent information on the status of the stock could be ignored. Ordinarily it is only an increase in recruitment values from the Q3 IBTS that could trigger a reopening of the advice. We believe this situation would be perverse, given the commitment by fisheries managers to use the best and most recent information available.

Notwithstanding the concerns set out above, we are comforted by work carried out by the UK delegation in 2021, which challenged the assumption made by ACOM on the level of cod discards. The UK's initiative prepared the ground for a more informed discussion when setting the cod TAC. We would urge the negotiating parties to ensure, once again, that the most recent and relevant

information is considered when setting the 2023 cod TAC. With respect to ICES' advice, a more general point is whether the rationale for continuing to release ICES' advice in June rather than in the autumn remains appropriate.

In recent years the situation with North Sea cod has been the driver for constraining TACs for several other key commercial species such as haddock and whiting amongst others. There is now a reason to remove or significantly reduce those constraints, which would allow a number of TACs to be set in line with the advice.

Over and above our concerns and suggestions relating to 2023, the group is keen to strengthen its dialogue with ICES in the coming months and years. Our fishermen believe that they can contribute significantly to the quality of scientific advice, from data collection to the assessment process in general, and a steer from ICES in the direction of national research institutes might be helpful in that regard.

Yours Sincerely



Mike Park
On behalf of the Northern Fishing Alliance, Cod Group

SAFPO

Scottish Association of Fish Producers' Organisations



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The National Federation of Fishermen's Organisations



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