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Dun Laoghaire, 26 April 2024

Dear Dr Banel,

Subject: NWWAC advice on the draft Joint Recommendation on directed fisheries for squid

The North Western Waters Advisory Council (NWWAC) wishes to provide additional feedback on the draft Joint Recommendation requesting the modification of the derogation from the baseline mesh size for directed fisheries for squid.

We note that the NWW Member States Group had begun the development of this Joint Recommendation in October 2021. The NWWAC had submitted advice¹ on 25 March 2022. An updated draft was received on 8 April 2024. The NWWAC also welcomes the information obtained from the NWW MS Technical Group and High Level Group meetings in February, March and April 2024.

The NWWAC notes that the Member States are requesting to amend the general derogation from the baseline mesh size of 40mm for directed fisheries for squid as listed in Annex VI, Part B of Regulation (EU) 2019/1241. In particular, the draft Joint Recommendation is proposing to increase the minimum mesh size to 80mm for bottom trawls and seines in all ICES Area 7 except for 7j, where the 40mm derogation should be maintained. The 40mm mesh size should also be maintained for pelagic otter trawls in 7e.

The majority of NWWAC members is in favour of such amendments and believe that the increase in the mesh size could reduce the unwanted catches of juvenile fish species. However, it was not possible to reach full consensus to reflect this in a revision of our 25 March 2022 advice.

However, the NWWAC would like to point at earlier advice prepared - *Views on and issues with the definition of "directed fishing"*². The NWWAC considers it important in the implementation of the Technical Measures Regulation that a clear definition of what constitutes "directed fishing" is required to give legal clarity to the use of mesh sizes. This applies equally to this specific measure for squid fisheries. The lack of agreement on the conditions that determine the use of the mesh sizes without a directed fishing definition effectively means the

¹ <https://www.nwwac.ie/publications/nwwac-advice-on-the-draft-joint-recommendation-on-directed-fishing-for-squid.3757.html>

² <https://www.nwwac.org/publications/nwwac-views-on-and-issues-with-the-definition-of-directed-fishing.2959.html>



mesh size regulations are unenforceable. We appreciate the effort from the NWW Member State Group to progress on this work in conjunction with other Regional Groups and are available to contribute where needed.

Thank you for your attention to this matter, we look forward to a continued appreciated cooperation.

Yours sincerely,

Emiel Brouckaert
Chairman of the NWWAC