



Ms Charlina Vitcheva  
Director-General for Maritime Affairs and Fisheries  
European Commission  
Jozef II-straat 99  
1000 Brussels  
Belgium

Dun Laoghaire, 20 December 2024

Dear Ms Vitcheva,

**Subject: Advice on technical request to ICES on the recovery of the cod stock in the Celtic Sea**

The North Western Waters Advisory Council (NWWAC) acknowledges the European Commission's ongoing commitment to address the state of the stocks in the Celtic Sea. The Commission has recently highlighted the pressing need to address the effectiveness of remedial measures for cod, haddock and whiting in the Celtic Sea. The AC is aware this is being discussed with the UK in the Specialised Committee on Fisheries as a priority topic. The NWWAC has already expressed views on these matters in a recent letter from May 2024<sup>1</sup>, pointing out that the state of certain stocks is likely being affected by factors other than fishing, including climate change and pollution.

The NWWAC organised a webinar in June this year<sup>2</sup>, which highlighted the effects of rising sea temperatures in the Celtic Sea on cod reproduction and spawning behaviours, leading to concerns about habitat suitability for cod survival.

Previous NWWAC recommendations have emphasised the importance of accounting for the impacts of climate change in scientific assessments. In our May 2023 letter<sup>3</sup>, we urged DG MARE to prioritise an evaluation of current cod survivability and recruitment potential in light of these environmental factors. The NWWAC believes that this evaluation will contribute to understanding the future viability of gadoid fisheries in the Celtic Seas and allow for the suitable and adaptive alignment in fisheries management measures.

Additionally, cod spawning and nursery grounds in the Celtic Sea are under threat from proposed offshore renewable energy developments off the South coast of Ireland. The NWWAC has repeatedly raised its concerns regarding this development and its potential impact on the spawning and nursery areas of several fish stocks, including cod, haddock and whiting, notably in its submissions to the Irish Department of Environment, Climate and Communications from October 2023<sup>4</sup> and June 2024<sup>5</sup>.

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<sup>1</sup> <https://www.nwwac.org/publications/nwwac-advice-on-technical-measures-in-the-celtic-sea.4688.html>

<sup>2</sup> <https://www.nwwac.org/listing/nwwac-webinar-on-climate-change-impacts-on-cod-in-the-celtic-sea.4704.html>

<sup>3</sup> <https://www.nwwac.org/publications/nwwac-letter-to-dg-mare-on-climate-change-implications-in-the-scientific-assessment-for-cod-stocks-in-the-celtic-seas-ecoregion.4226.html>

<sup>4</sup> <https://www.nwwac.org/publications/nwwac-response-to-decc-dmap-consultation.4376.html>

<sup>5</sup> <https://www.nwwac.org/publications/nwwac-response-to-the-public-consultation-on-the-draft-south-coast-designated-maritime-area-plan-for-offshore-renewable-energy-dmap.4866.html>





Furthermore, on 06 December 2024<sup>6</sup>, the NWWAC highlighted deficiencies in the Ecological sensitivity analysis of the Celtic Sea to inform future designation of Marine Protected Areas (MPAs) to the Department of Housing, Local Government and Heritage Ireland which failed to include protected area network solutions in coastal waters. These waters have the highest conservation values and are the most ecologically sensitive as there is a diversity of habitats in these areas that are not found offshore, including spawning and nursery areas for important commercial species such as cod..

For these reasons, and in view of the upcoming Annual Meeting between ICES and Requesters of ICES Advice (MIRIA), **the NWWAC recommends that the Commission submits a technical request to ICES to assess whether the recovery of the cod stock in the Celtic Sea remains achievable.** Key considerations should include whether the stock can recover under current and projected environmental conditions and whether fisheries will remain viable.

We believe that a targeted technical request to ICES will provide valuable insights to guide the understanding of the future viability of cod fisheries in the Celtic Seas and allow for the suitable and adaptive alignment of fisheries management measures.

Thank you for your attention to this critical matter, we look forward to discussing this further with you.

Yours sincerely,

Emiel Brouckaert  
NWWAC Chair

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<sup>6</sup> <https://www.nwwac.org/publications/nwwacpelac-submission-on-the-ecological-sensitivity-analysis-of-the-celtic-sea-to-inform-future-designation-of-marine-protected-areas-mpas-report.5184.html>

