



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

Dun Laoghaire, 27 January 2025

Dear Ms Vitcheva,

Subject: Advice on new approaches to fisheries management principles

At the Executive Committee meeting of the North Western Waters Advisory Council (NWWAC) in October 2024, discussions with DG MARE Head Of Unit C.5 Eva Carballeira highlighted the need for new approaches for fisheries management. Therefore, the NWWAC would like to put forward the recommendations outlined below, aiming to address challenges related to sustainability, socio-economic impacts, and ecosystem-based management.

NWWAC members emphasised the following aspects:

- The critical need for comprehensive socio-economic assessments to support informed policy decisions. Changes stemming from Brexit, Marine Protected Areas (MPAs) and Offshore Renewable Energy (ORE) installations have had profound effects on the viability of the fishing industry. For instance, displacement from MPAs must be evaluated to understand whether fishing efforts can be redistributed without harming other stocks or fisheries.
- Policies must weigh biodiversity and conservation goals against the role of fisheries in ensuring food security, particularly in coastal communities. The upcoming review of the Marine Spatial Planning (MSP) Directive presents an opportunity to ensure this balance is better addressed.

As the Commission evaluates the Common Fisheries Policy (CFP) and revisits directives such as on Marine Spatial Planning, the NWWAC stresses the importance of Advisory Councils in representing the EU stakeholders. As mentioned in previous advice, the NWWAC supports a holistic, ecosystem-based approach to fisheries management, which should include:

- Ecosystem dynamics: consideration of intra-species and inter-species interactions to avoid unintended consequences of rebuilding certain stocks. For instance, increases in the biomass of one species can impact others within the food web.
- Climate change impacts: rapid environmental changes are altering marine ecosystems, yet these shifts are not fully integrated into stock assessments and management measures. Greater emphasis on incorporating environmental variability into decision-making is essential.





To build trust in management decisions, the NWWAC recommends that data collection is enhanced through improved mechanisms for collecting and utilizing data from vessels. This could bridge gaps between scientific advice and on-the-ground realities. Moreover, expanding science-industry initiatives can foster collaboration and promote mutual understanding.

As an example, the reopening of the spurdog fishery after a prolonged closure, offers valuable lessons for broader fisheries management. The current maximum size limit for spurdog, aimed at protecting large females, raises concerns regarding the survival potential of individuals returned to sea after catching. This highlights the need for adaptive management measures tailored to specific gear and species life cycles. The NWWAC was made aware of this topic being discussed in the Specialised Committee on Fisheries (SCF), with participation of Bord Iascaigh Mhara and Cefas. In this respect we wish to highlight the importance of industry-science collaboration. Expanding such approaches to other fisheries can help ensure that management measures are both effective and practical.

We hope these recommendations will contribute to the Commission's efforts to refine fisheries management principles in a way that ensures ecological sustainability, economic viability, and social equity. The NWWAC is ready to provide further input and engage in discussions to support this process.

We would welcome the opportunity to discuss these proposals further and look forward to a continued appreciated cooperation.

Yours sincerely,

Emiel Brouckaert
NWWAC Chairman

