



CONSEIL CONSULTATIF POUR
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SEPTENTRIONALES

NORTH WESTERN
WATERS
ADVISORY COUNCIL

CONSEJO CONSULTIVO PARA
LAS AGUAS
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Ms. Charlina Vitcheva
Directorate-General for Maritime Affairs and Fisheries
European Commission
Rue Joseph II, 99B-1000
Brussels, Belgium

Cc: Ms Marissa Giesen, Mr Peter Paul Mertens
Ministry of Agriculture, Nature and Food Quality
Team Fisheries

Dun Laoghaire, 25 August 2026

Dear Ms Vitcheva,

Re: NWWAC Advice on the implementation of Technical Measures and Rebuilding Plans in the context of EU–UK fisheries management

The North Western Waters Advisory Council (NWWAC) notes that, in the framework of the 2026 fishing opportunities consultations, the EU and the UK agreed on enhanced technical measures building on the existing regulatory framework. These measures were designed, in particular, to strengthen protection for fish stocks assessed as being in a depleted state, including those falling below safe biological limits under ICES assessments.

The NWWAC also acknowledges that the adoption of such measures constitutes a legal obligation on the EU side. The measures in question have been incorporated into the 2026 Fishing Opportunities Regulation under Articles 19 and 20¹, which the NWWAC recognises as the first time that such a procedural approach has been applied in the context of EU–UK consultations since Brexit and the entry into force of the Trade and Cooperation Agreement. The NWWAC appreciates that over the past months it has been kept informed by the Commission regarding the timing of the entry into force of these measures. Specifically, the measures for the Celtic Sea entered into force on 1 June, whereas those for the Irish Sea and the Channel are expected to be delayed until 1 September, due to the need for additional legislative procedures on the UK's side.

The NWWAC received, on 5 June, the draft Joint Recommendation (JR) from the Dutch Presidency of the North Western Waters Member State Group (NWW MSG) for consultation, with a deadline of 16 June.

The NWWAC recognises that the timely implementation of technical measures is crucial to safeguard stocks at risk. However, members of the NWWAC consider that the process of incorporating these measures into the 2026 Fishing Opportunities Regulation has resulted in a lack of genuine involvement of the sector, with discussions effectively confined to a high-level exchange between the EU and the UK. Therefore, AC members welcome the Commission's intention to avoid repeating this process in future and clearly separating fishing opportunities from technical measures.

¹ [EUR-Lex - 02026R0249-20260101 - EN - EUR-Lex](#)



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Moreover, the differing timelines for implementation across the various NWW sea basins, together with the associated delays, have raised concerns among NWWAC members regarding credibility and legal certainty. In particular, there is a perceived lack of assurance that the measures for the Irish Sea and the Channel will effectively enter into force on 1 September, which contributes to a sense of uncertainty for stakeholders. The NWWAC recommends pursuing greater consistency in the implementation of technical measures in coordination with the UK, so as to ensure a level playing field, maintain the trust of stakeholders, and provide them with sufficient clarity and adequate time to adapt to the proposed measures. Furthermore, the AC emphasises the need to compare all existing texts with the amendments introduced by this Joint Recommendation, in order to ensure that these do not inadvertently lead to changes that have not been anticipated, analysed or identified in advance.

In addition, the NWWAC recommends ensuring legal clarity regarding the amendments to the Technical Measures Regulation, in particular Annex VI, Part B², which does not yet reflect the technical measures introduced in the 2026 Fishing Opportunities Regulation. The NWWAC therefore considers it essential that consistency and legal certainty are achieved and advises the Commission to clearly identify which regulation has priority when technical descriptions in the different regulations do not appear to be the same. In addition, the NWWAC recommends developing clearer and more accessible communication towards stakeholders regarding regulatory changes and evolving management approaches. Given the number of amendments, delegated acts, and procedural steps involved, the current framework can be difficult for the sector to navigate and to interpret clearly.

On the content of the draft NWW MSG Joint Recommendation, the NWWAC notes that Section X.5 [A1.1] is not included in the EU-UK Written Record, although it is included in the Annex to COUNCIL REGULATION (EU) 2026/249. Given the intention of the JR is to transpose the provisions of the written record into a Delegated Act, and as this provision is already included in Annex VI of Part C para 10.1 of Regulation (EU) 2019/1241 (consolidated version), then the NWWAC questions why this provision is included in the JR. We would suggest this be removed by the Member States from the JR as it is duplication.

Regarding the involvement of the AC in the consultation process, while the NWWAC appreciates that the Commission and the NWW MSG have provided information and updates, it notes that there has nonetheless been insufficient time and a lack of genuine involvement to enable the AC to effectively contribute and provide recommendations. The NWWAC recalls recent advice submitted to the European Commission on strengthening the role of Advisory Councils in the development of technical and remedial measures³. In this context, the NWWAC reiterates the recommendations set out in that advice, namely that “the Commission and Member States should provide clear and realistic timelines for Advisory Councils to contribute to the preparation or revision of delegated and implementing acts related to the Technical Measures Regulation, as

² [EUR-Lex - 02019R1241-20260101 - EN - EUR-Lex](#)

³ [NWWAC Advice on strengthening the role of the Advisory Councils in developing technical and remedial measures](#) (16 December 2025)





well as to remedial measures, and allow sufficient time for such recommendations to be formulated. Moreover, the NWWAC recommends that, in light of operational and economic realities, the implementation of new technical measures should be phased in over a reasonable timeframe, so as to enable fishing operators to adjust accordingly.” In addition, the NWWAC invites the Commission to clarify the methodology that will be used to assess the economic impacts of the proposed measures, in order to ensure full transparency regarding the costs associated with the enhanced technical requirements for the fleets.

Strictly in relation to the above, the NWWAC also wishes to highlight the ongoing work on rebuilding plans, in particular those concerning cod, haddock and whiting in the Celtic Sea, as well as sole and plaice in the Eastern Channel. The NWWAC is aware that discussions with the UK are ongoing in this regard. The NWWAC emphasises that rebuilding plans must be based on robust and up-to-date scientific assessments that accurately reflect stock status, including the impacts of climate change on recruitment, distribution and productivity. It recommends that the Commission, in cooperation with ICES, systematically integrate these factors into scientific advice and management decisions, and clearly acknowledge where environmental conditions may limit stock recovery. Finally, the NWWAC stresses the importance of early and genuine stakeholder involvement in the development of rebuilding plans, in order to ensure that measures are realistic, proportionate and supported by the sector; and emphasises the need for the AC to be meaningfully involved and given adequate opportunity to provide timely and substantive recommendations.

In conclusion, the NWWAC reiterates its full commitment to supporting the development and implementation of technical measures, particularly through the Joint Recommendations process, as well as rebuilding plans, with a view to ensuring that local knowledge is adequately and timely taken into account. In this regard, meaningful stakeholder input and involvement can contribute to the design of practical and realistic measures, thereby reinforcing trust, ensuring a level playing field with third countries, and supporting a more effective and credible management framework.

Yours sincerely,

Alexandra Philippe, NWWAC Chair

