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Dun Laoghaire, 11 April 2024

Dear Dr Banel,

Subject: NWWAC advice on a joint recommendation for a de minimis exemption for lemon sole in ICES areas 4 and 7d

Thank you for the opportunity to provide feedback on the draft Joint Recommendation for a de minimis exemption for lemon sole for beam trawlers (TBB) using mesh equal to or above 80 mm in Union waters of ICES areas 4 and 7d.

A first draft was received on 4 March and discussed during the meeting of the AC's Working Group 3 Channel on 13 March. The NWWAC also welcomes the information obtained from the NWW MS Technical Group and High Level Group meetings in February, March and April. A final draft was received on 26 March.

In general terms, the NWWAC supports the content of the draft Joint Recommendation. In addition, the NWWAC advocates for the application of this exemption to all types of trawlers operating in ICES areas 4 and 7d. The AC seeks clarification on why the exemption has been limited solely to beam trawlers and urges further consideration of this aspect in the Joint Recommendation process.

The NWWAC also wishes to mention the [ICES advice provided in 2018 on the contribution of TACs to fisheries management and stock conservation](#), which suggests that removing the EU/UK TACs for lemon sole in ICES Division 3.a, Subarea 4, and Division 7.d may generate a lower risk of the stock being exploited unsustainably. This advice was [reviewed in 2022 by ICES following a EU/UK request](#) which confirmed that the conclusion on lemon sole remains valid. This element should be included and considered in the Joint Recommendation on lemon sole to provide a complete overview to STECF and DG MARE.

Furthermore, the NWWAC points out that this exemption has no negative impact on Total Allowable Catch and there will be no additional choke risk with this exemption in place.

The NWWAC believes that close cooperation between the AC and the Regional Member States' Group is important for the continual improvement of fisheries management in the North Western Waters, and





is needed to fulfil the NWWAC objective to optimise the efficiency of the consultation process, the exchange of ideas and the production of advice. Whilst the Member States Group is developing the Joint Recommendation, the NWWAC greatly appreciates being kept informed of any changes and requests made by the Commission for adjustments, as well as being asked for input where relevant.

Yours sincerely,

Emiel Brouckaert
NWWAC Chairman

