

# Northern Fishing Alliance

## Ling (*Molva molva*) TAC 2024 and 2025 (Northeast Atlantic and Arctic stock)

On behalf of fishers operating from Norway, the UK, and EU Member States, we ask that fisheries managers depart from current ICES advice, which is to reduce ling catches to “no more than 13 317 tonnes in each of the years 2024 and 2025”. Such a reduction would represent a 12% reduction in advised catches relative to 2023.

Apart from its status as a valuable species, ling is regularly cited as a choke risk throughout the North Sea. An unwarranted cut in ling quotas at this time would therefore unnecessarily undermine the fishing industry’s viability whilst further exacerbating the already challenging management issues.

### Assessing the stock

Ling is a Category 3 stock. There is no direct estimate of its size, and no reference points are defined.

The assessment of the ling stock is based primarily on CPUE data from the Norwegian long-line fishery in Areas 4 and 6. Around three-quarters of all landings of ling come from these areas.

Several of our member organisations are involved in data-collection projects that seek to build on the existing long-line series. We are confident that useful data will emerge from these initiatives, effectively corroborating what fishing vessels are reporting on an anecdotal basis, although clearly this is a long-term process.

In the meantime, we are confronted with advice generated from the ‘new’ ICES framework for Category 3 stocks (the ‘rfb rule, method 2.1’, 2022), which, in the view of our members, has serious shortcomings. The current output on ling delivers counter-intuitive results to the degree that the advice based on it should be regarded very sceptically.

More specifically, there are three problems with the advice to which we would draw the managers’ particular attention.

Problem 1: overall credibility

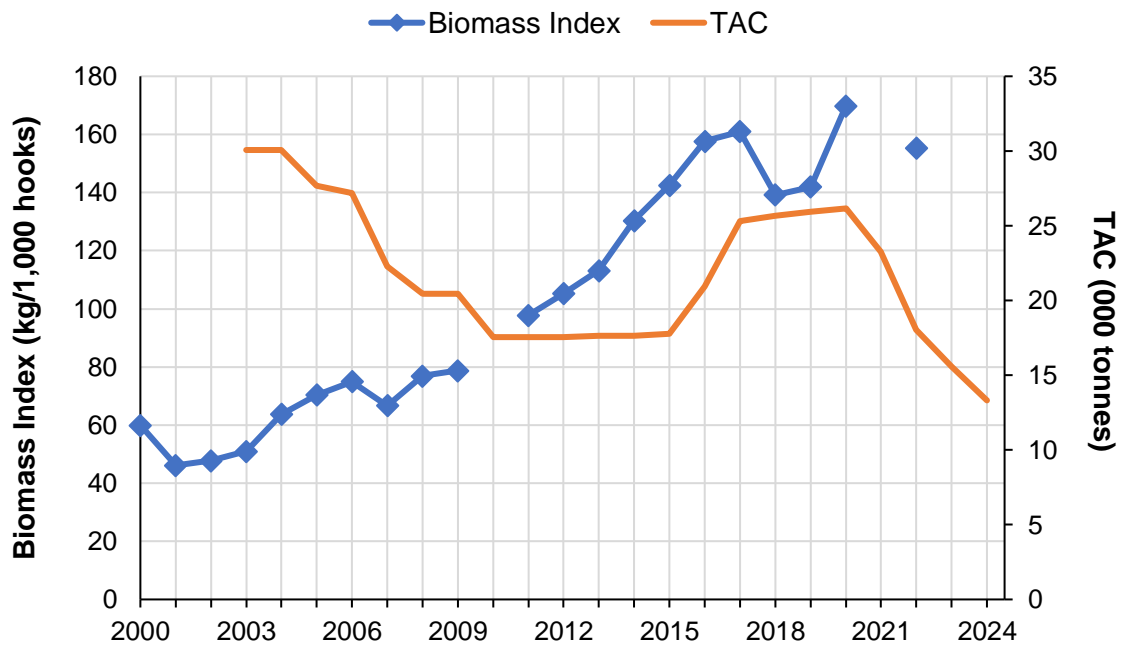
As the chart below shows, the index of ling abundance used for this advice has more than tripled since 2001. More specifically, the average biomass index (CPUE) over the last three years (163 kg / 1,000 hooks) was more than three times that in the first three years of the time-series (51 kg / 1,000 hooks).

Despite this increase, the TAC in 2023 is less than half the TAC of the mid-2000s, and half what it was in the late 2010s.

The message would seem to be that the more abundant the biomass is, the lower the quota delivered. From this evidence – and there is very little else that ICES looks at – the ling stock has been in better health over the past five years than it had been over the preceding fifteen, yet the proposal is to reduce the TAC to half of what it was in 2020.

This is not a credible position. If the only biomass evidence we have suggests a tripling of the stock over the past two decades, it is hard to see why quotas should be lowered further, especially as there is no reference point for ling to aim at.

The advice on ling very much undermines elements of good work ICES has done in collaboration with industry in recent years, particularly over North Sea cod. At a time when closer links between science and industry offer real hope for better data collection and stock assessment in the future, it would be a serious mistake to entertain such a bizarre outcome from the Category 3 model.



*The catch rate of ling from the Norwegian longline reference fleet (the biomass index) and the TAC for ling.*

### Problem 2: target mean length

The ling assessment depends in part on comparing the average length of ling caught in the last year with an ideal 'target mean' length (MSY proxy length). It appears that these lengths are based only on data from the Norwegian reference fleet.

There is a paradox in the assessment model, in that a higher level of recruitment – leading to more smaller fish in the stock – will reduce the average size of the fish caught. All other things being equal this will result in advice to reduce catches! By the same token, a slump in recruitment would be expected to result in a higher average length in catches and therefore advice to increase catches in the future.

A further complication arises when we consider market demand for ling. There has been significantly more demand for smaller ling in European markets in recent years. This will of course make a difference to the sizes that skippers target when at sea, producing a shorter average length.

As with the overall results, these are bizarre outcomes that managers should take account of, especially the mean length anomaly.

### Problem 3: the precautionary multiplier

The formula used to generate the ICES advice under the 'rfb rule' includes a 'precautionary' multiplier of 0.95. That means, even if all else remains the same, ICES will always advise a 5% cut in the TAC. If followed, this approach will inevitably lead to a downward spiral in the advice.

We do not see why the ling TAC should be cut in the theoretical event that all empirical data is unchanged. While managers may wish to be precautionary, perhaps for reasons that have not (or cannot) be considered in the existing advice process, it is inappropriate to build-in automatic cuts to advised catches when they are unsupported by any evidence. It is for ICES to present the results of a scientific assessment, not to exert a systematic downward bias on its results.

### Departing from advice: the absence of MSY

Fisheries Managers will be aware that ICES do not suggest in its advice for ling that following its recommendations will lead to or maintain a healthy stock in terms of MSY. Indeed, MSY is almost completely absent from its analysis, with reference only to an F MSY proxy derived from an arbitrary length assumption. For those managers that are required to aim for MSY, departing from this advice does not mean ignoring some MSY imperative.

### Responsible fisheries management

Fisheries managers themselves often assert that while they seek advice from ICES and are grateful to obtain it, they have a duty to make up their own minds about how far any piece of advice is followed.

In the light of the serious shortcomings embedded in the ling advice for 2024 and 2025, we urge that managers take a step back from what appears to be a flawed model and at least refrain from reducing the ling TAC in 2024 and 2025.