

Northern Fishing Alliance, Cod Group

Comments to the ICES cod-advice published 19th of September 2023

Cod (*Gadus morhua*) in Subarea 4, divisions 6.a and 7.d, and Subdivision 20 (North Sea, West of Scotland, eastern English Channel, and Skagerrak)

1. Executive summary

The Northern Fishing Alliance (NFA) propose that the catch opportunities for northern shelf cod should be based on the ICES MSY approach applied across all three sub stocks. Upon evaluation of the recently published advice, our conclusion is that the recent headline advice from ICES is unnecessarily precautionary when the status of all three sub-stocks is considered. Based on the MSY approach, catches for the sub-stocks should be 21,380 tonnes for the Northwestern, 8,818 tonnes for the Viking, and 3,922 tonnes for the Southern, which delivers a total of 34,120 tonnes.

2. Context

The NFA represents demersal fishermen who are engaged in the sea areas covered by the ICES advice on northern shelf cod. The alliance carries out its work through several single species focused working groups, one of which looks at matters relating to cod. The Alliance communicated our thoughts on several matters to managers ahead of previous fisheries negotiations.

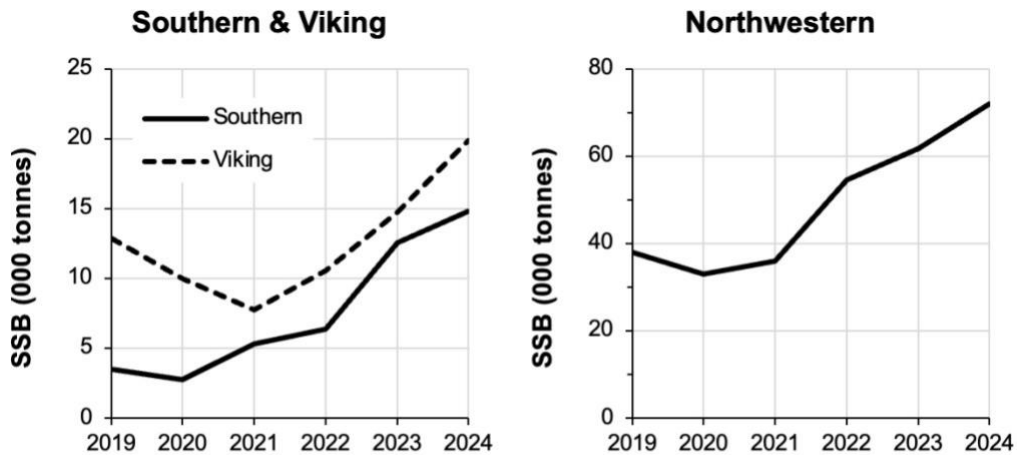
The NFA cod group met in Schiphol on the 26th of September to establish a position on the recent ICES advice on cod in Subarea 4, divisions 6.a and 7.d, and Subdivision 20 (North Sea, West of Scotland, eastern English Channel, and Skagerrak) published on 19th of September.

The text below is the agreed position of the group.

3. Introduction

The new approach to assessing cod was first proposed by WKBCOD in February of this year, accepted by WGNSSK in April and accepted by ADGNSCOD in August. It is our understanding that ACOM also accepted the full approach.

ICES data show that the biomass of all three sub-stocks have increased substantially in recent years. By 2024, the biomass of the Southern stock will have increased more than five-fold from 2020 while those of the Viking and Northwestern stocks will have doubled. Fishing pressure on all three sub-stocks will have decreased significantly over the same period.



The spawning stock biomasses of the Southern, Viking and Northwestern cod sub-stocks from 2019 to 2024 (ICES data).

The Northwestern sub-stock biomass is above MSY Btrigger, and the Viking stock will be above Btrigger by 2024. The Southern component whilst below Blim currently, will grow to be above Blim during 2024 and will be above Blim in 2025 if the catch on that component is kept lower than 9,235 tonnes.

When ICES applies its ad hoc interpretation of the precautionary approach to all three sub stocks it delivers a total TAC of 22,691 tonnes. This corresponds to 13,529 tonnes from the Northwestern sub-stock, 5,240 tonnes from the Viking sub-stock, and 3,922 tonnes from the Southern sub-stock, which is 17% less (4,527 tonnes) than the joint TACs of 27,218 tonnes for the same areas in 2023.

If the MSY approach, which was the position of the ADG, is applied to all three stocks it delivers a total TAC of 34,120 tonnes, which corresponds to 21,380 tonnes from the Northwestern sub-stock, 8,818 tonnes from the Viking sub-stock, and 3,922 tonnes from the Southern sub- stock.

The ICES advice demonstrates significant growth in the North Sea cod stock over several years. A recommendation for a reduction in the overall TAC (-17%) for 2024 relative to 2023, does not appear to align with the improving status of the overall stock reflected in the increasing biomass and reducing fishing pressure on each sub-stock.

Notwithstanding the new approach, and what that tells us about population dynamics within and between various sub-stocks, the same element of risk from sub-stock mixing applies for 2024 just as it has in 2023 and the decades prior to that. Other than an unprecedented and highly unlikely shift in catching power into the southern North Sea, it is hard to justify why there now seems to be a risk to the Southern sub-stock and why to manage that risk we must reduce catches to below the TAC of 2023, a period that delivered a continued increase in biomass.

It is difficult to comprehend why the fishermen who very rarely fish south of 60° North should be burdened with an artificial reduction in the cod TAC because of an unquantified mixing (currently understood to be relatively low) of sub-stocks elsewhere.

The real loss to these fishermen is not the difference between what they were allowed to catch in 2023 and what the headline advice states, but it is the chasm between what they should be allocated in 2024 and what ICES suggest they are allocated.

The contrasting positions deliver a difference of 11,429 tonnes, or 33% less than what it should be under the MSY approach, which in monetary terms at £3.50/€4/46 NOK per KG at first sale value converts to around £40M/€46M/526M NOK.

4. Assessing and managing the risk

Application of ICES' ad hoc interpretation of the precautionary approach across all three sub-stocks would seem to be driven by uncertainty regarding the extent of mixing outside of the spawning season in quarter one (Q1), and that the current position is an intermediate step between single-stock assessment and a full mixed-stock model. While NFA understand and agree that an element of risk may exist, we strongly disagree with the extent of the risk and indeed how that risk should be managed.

It is concerning to NFA members that ICES has appeared to adopt the role of managers, which is clearly not their function. The role of ICES is to provide advice rather than to determine management measures to reduce any risk to stocks. North Sea nephrops is an example where ICES suggest that management should be implemented at the functional unit level, but correctly leave it to managers to determine how that should be applied.

There are several ways of managing risk to the southern sub-stock other than the route applied by ICES and, similarly, there are several ways to determine the severity of any risk to the sub-stock population. Fishing patterns vary very little one year to the next and to pose a risk to the Southern sub-stock to the degree assumed by ICES, would require a significant change to those fishing patterns.

The impact on vessel operations of reducing the TAC for a species when the biomass is on the increase is counter intuitive, especially when the fishing pressure is relatively low. The headline advice delivers the highest fishing pressure on the weakest Southern stock at F0.182, whilst the fishing pressure on the stronger Viking stock is F0.112 and the strongest Northwestern stock F0.132. According to the assessment data, these fishing pressures are well below anything previously witnessed.

Supplementary actions to control fishing pressure such as spatial, temporal, and technical measures lie outside the remit of ICES, although they are aware of how they operate and the impact they can have. In that case we view the position of ICES presented in the 2024 cod advice as a significant overreach to solve their underlying concern for the southern stock.

To better understand the risk to the Southern sub-stock it is important to consider what is currently known about sub-stock mixing. There is evidence that mature fish gather in their own sub-stock areas to spawn, and it is unlikely juvenile fish engage in seasonal migrations to any degree. In addition, tagging information contained in the report from an ICES workshop in 2020¹ suggested very little movement with cod occurs in a north to south direction. This evidence suggests that any threat to the Southern sub-stock is minimal and is certainly not significant.

¹ WKNSCodID. Workshop held 3–6 August 2020

Notwithstanding the different views held on the extent of mixing and the risk posed to individual sub-stocks, the NFA are of the opinion that harvesting of cod should continue in line with the observation of an increasing biomass, following the MSY approach. This is a particularly important consideration, especially in a mixed fishery management regime that puts high importance on adherence with the landing obligation.

The NFA acknowledge that, while there is evidence to suggest that extensive mixing does not take place between the Southern sub-stock and Northwestern and Viking sub-stocks, additional data will always improve our understanding of stock dynamics and movement. Our members offer their help in gathering data to reduce the level of uncertainty on the mixing of the sub-stocks as recommended by WKRRCOD.

5. Way Forward

The Alliance recommends that the way forward is to set quotas for 2024 in line with the MSY approach as laid out in the advice and supported through every stage of the ICES process prior to ACOM.

Stock	MSY approach	Total Catch (2024)	F_{total} (2024)	SSB (2025)	% SSB Change
Southern	$F = F_{MSY} \times SSB(2024) / MSY B_{trigger}$	3922	0.182	27170	+84%
Viking	$F = F_{MSY}$	8818	0.196	27939	+41%
Northwestern	$F = F_{MSY}$	21380	0.223	97176	+35%
TOTAL		34120		152285	+43%

The NFA note the concerns of ICES, although we disagree on the need to address them given the positive development of the Southern sub-stock.

6. Allocation of catches to management areas

There is now recognition post benchmark that cod to the west of Scotland (Northern area) is part of the same stock that swims around Shetland and into the northwest Scottish zone (Northwestern sub-stock). There will now be a negotiation on what share of the total TAC should be allocated to area 6a, and there is no doubt that discussion will be challenging given that several countries have shares in the area 4 cod but not in area 6a. Despite this, the NFA are of the opinion that the discussion should be principled and based on the best information at hand.