

# LDAC ADVICE TO THE EUROPEAN COMMISSION

# Recommendations for NAFO 47th Annual Meeting Halifax (Canada), 15-19 September 2025

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R-04-Ej.19 (2025-2026)/WG2

#### **BACKGROUND**

The meeting of the NAFO Scientific Council (SC) and its Standing Committees, held from the 29<sup>th</sup> of May to the 12<sup>th</sup> of June 2025, assessed the state of main commercial stocks in NAFO and as a result a table with recommendations for fishing opportunities for 2026 was presented (see table 1).

A delegation composed by the LDAC Chair, several members of the LDAC WG2 representing both the concerned EU MS fleets with commercial interest in the fishery and environmental NGOs, and the LDAC Executive Secretary all participated at a coordination meeting with the DG MARE lead negotiator and his team held virtually on 25<sup>th</sup> of August 2025. A summary overview was given on the report of the Scientific Council and its advice for 2026 and beyond in relation to the main stocks for decision, as well as other conservation issues including ecosystem considerations.

At the meeting there was also a short reference made to the work of several NAFO Working Groups, including the ones on Ecosystem Approach Framework to Fisheries Management (WG-EAFFM) and on Risk Based Management Strategies (WG RBMS) as well as a presentation on the work of the Working Group on Control and Compliance (STACTIC).

# **AIM OF THE ADVICE**

Through the present advice, the LDAC would like to make several recommendations addressed to the negotiating team of DG MARE on behalf of the European Commission and the Fisheries Administrations of the Member States of the EU, based on the outcomes of the Scientific Council and relevant NAFO WGs. One of the key recommendations would be on the fishing opportunities for 2026 that will be decided at that meeting, together with other management and conservation measures which are of relevance of the commercial fisheries for the LDAC members (both EU fleet and other interest groups including environmental NGO) in NAFO RA.



For comparative analysis purposes, below is a summary table containing TACs approved for 2024 and 2025, as well as the level of estimated catch in terms of quota consumption in the last full year closed, i.e. 2024. The catch values are the ones agreed at the Joint Commission-Scientific Council "Catch Estimation Strategy Advisory Group" (CESAG).

The catch estimates made by the CESAG combine catch from all species by DCR (daily catch reports transmitted by fishing vessels to NAFO) and port inspection reports for all stocks and countries, completing it with Canada's catch data within its EEZ. Finally, this table also contains the recommended TAC made by the Scientific Council for 2026.

Table 1. Estimated catch(t) for 2024 (CESAG), TACs adopted (t) for 2024 and 2025 and management recommendations for TAC for 2026 for main commercial stocks of NAFO Regulatory Area.

Stock	Estimated	TAC 2024 (t)	TAC 2025 (t)	Recommended
	Catch 2024 (t)			TAC for 2026 (t)
Greenland Halibut (GHL)	14 822	15 153	14 791	14 729
2+3JKLMNO				
Cod 3M	10 582	11 708	12 613	15 360
Cod 3NO*	242	ndf	ndf	ndf
American Plaice 3LNO*	376	ndf	ndf	ndf
American Plaice 3M*	201	ndf	ndf	ndf
Witch Flounder 3NO*	248	1 367	1 395	1 461
Redfish 3M*	9 477	17 503	17 503	15 636
Redfish 3LN*	9 403	18 100	6 000	ndf
Redfish 30	2 728	20 000	20 000	ndf
White Hake 3NO	682	1 000	1 000	500?
Capelin 3NO*	5	ndf	ndf	ndf
Thorny Skate/Rays 3LNO*	2 385	7 000	7 000	3 460
Yellowtail Flounder 3LNO	3 019	15 560	15 810	24290
Squid 3+4 (3LMNO)*	5	34 000	34 000	-
Shrimp 3M*	0	ndf	ndf	ndf
Alfonsinos 6G*	0	ndf	ndf	ndf

ndf = no directed fishery (moratorium); \* Stocks assessed in previous years.



#### REQUESTS FOR ADVICE MADE TO SC BY NAFO COMMISSION FOR 2026

The LDAC notes that the stocks for which SC has run new assessments with its respective levels of TACs determined for this year are:

#### Stocks assessed in June 2025

• Cod Div. 3M (TAC 2026)

Yellowtail Flounder Divs. 3LNO (TACs 2026 and 2027)
 White hake Divs. 3NO and Sub. 3Ps (TACs 2026 and 2027)

• Redfish Div. 30 (TACs 2026, 2027 and 2028)

• GHL Sub. 2 y Div. 3KLMNO (TAC 2026 via the MP)

# Updated assessment to be issued in September 2025

• Shrimp Div. 3LNO (TACs 2026 and 2027)

Squid 3+4 (September) (TACs 2025, 2026 and 2027)

For the Grand Banks (Divs. 3LNO) stocks, all the time series have not been calibrated for all species and divisions due to changes of Canadian research survey vessels and lack of data between the outgoing and incoming vessels. Therefore, a complete evaluation will have to wait some years to use new series in the assessments.



# SECTION I. RECOMMENDATIONS TO SCIENTIFIC COUNCIL (SC) ADVICE ON SETTING OF TAC AND OTHER MANAGEMENT MEASURES FOR COMMERCIAL STOCKS OF INTEREST

# 1. Cod on NAFO Div. 3M - Flemish Cap (TAC for 2026)

# 1.1. <u>Summary of scientific advice: stock status</u>

At the SC meeting in June 2025, the results of the Bayesian SCAA model introduced at the 2018 benchmark was used again as the basis for the assessment of this stock with data from 1988 to 2024.

The current model shows the following results:

- The spawning stock biomass (SSB) has declined rapidly since the peak years of 2012 to 2017 but has remained stable during the last 4 years and is estimated to be above *Blim* but below *Btrigger* (Cautious Zone) at the beginning of 2024.
- The recruitment (R) has varied since 2013 at intermediate levels but much lower than those observed in 2011-2012. In 2021, a good recruitment was observed, while in 2023 and 2024 is at a very low level.
- Fishing mortality (F) has remained below Flim and Ftarget since 2012.

The SC projected the F scenarios defined for placing the stock in the Healthy Zone in accordance with the PAF. Five different scenarios of F were selected:  $F_{bar} = 0$ , 0.75  $F_{lim}$ , 0.85 $F_{lim}$ ,  $F_{lim}$  and F giving a 50% probability of a SSB increase in 2027 (i.e.  $F_{50\%~HZ)}$ . It is foreseen that the stock is on the Healthy Zone from 2025 (above  $B_{trigger}$ ) with a probability higher than 50%. Under the scenarios with Fbar  $\leq$  F50%HZ, SSB during the projected years will remain in the Healthy Zone (above  $B_{trigger}$ ) with a probability higher than 50%. Under all scenarios, the probability that  $F_{bar}$  is higher than  $F_{lim}$  is lower or equal to 16% in 2026.

To maintain the stock in the Healthy Zone with a probability higher than 50%, the SC advice that catch does not exceed F  $_{50~HZ}$  corresponding to a catch level of 15 360 t in 2026, with a risk of 1% of exceeding  $F_{lim}$ .

Considering that the biological parameters and the state of the stock have remained relatively stable in the last years, the SC reiterates its proposal to run a full assessment of this stock every two years. The SC suggest that this new assessment cycle takes places with the assessment in June 2027, based on the calendar for assessment of other stocks.



#### 1.2. LDAC technical considerations

- The LDAC is pleased to note the gradual increasing trend of fishing opportunities in the last 5 years from a very low starting point with a TAC of 1,500t for 2021 to 12,613 for 2025, and a scientific proposal for advice for 2026 of around 15,600. This indicates that the stock is growing and recovering moving around or above historical average levels.
- The LDAC notes that there are indications that the biomass appear to have stabilised since 2021 and hopes the SSB increases according to the projections made linked to a combination of low fishing pressure, increase in recruitment and better environmental conditions. This combination of precautionary TAC with technical (flanking) measures in force, including use of mandatory "Norwegian" grid to avoid catch of small individuals and the continuation of the seasonal time area closure in the first quarter of the year (January-March), should contribute to protect spawning aggregations to improve future recruitments.
- In line with the precautionary approach and to achieve a proper balance between biological, social, and economic sustainability, the LDAC would like to avoid high fluctuations on TAC between years and reiterate its proposal in adopting a robust medium-long term approach which can take into consideration the Management Strategy Evaluation (MSE) process for this stock to allow to set a correct baseline and flexibility mechanisms in the forthcoming years.
- The LDAC reminds that environmental factors are playing a key role in the recruitment levels observed in the last decade in the Flemish Cap. Therefore, the LDAC supports further work of the NAFO Scientific Council Working Group on Ecosystem Science and Assessment (WG-ESA) on species interactions and ecosystem productivity between cod, shrimp, and redfish stocks, and encourages to develop consistent and robust models to inform managers and bring ecosystem considerations into the advice without compromising management decisions on single stocks in the short term.
- The LDAC notes that the effects of the technical flanking measures for 3M cod adopted in 2021 are only partially considered by the SC to see changes in recruitment and fishing mortality per age. The operators have witnessed greater dispersion of this stock, with higher variability and unpredictability in the volume of catch in the area as a result of different factors including effects of warming of waters and changing of fishing season from beginning to later in the year as a result of the technical measures.



#### 1.3. LDAC Recommendations to the EU for Cod NAFO Div. 3M:

- R1. The LDAC supports the SC advice of a catch level that does not exceed 15 360 t in 2026 according to  $F_{50\ HZ}$ , in order to maintain the stock in the Healthy Zone with a probability higher than 50%.
- R2. Given the stability of the stock in terms both of SSB and F in the last five years, and considering that the risk of exceeding Flim under the current advice is of 1%, with five scenarios projected that place the stock in the Healthy Zone in accordance with the PAF, the LDAC would like ask the EC to submit a question to the SC on what would be the upper ceiling/threshold for catch within the Healthy Zone for all scenarios.
- R3. The LDAC continues supporting the implementation of the technical (flanking) measures adopted at the Annual Meeting in September 2020 to rebuild the stock and protect spawning aggregations of 3M Cod, namely:
  - Improving gear selectivity through the mandatory use of the sorting ("Norwegian") grid and analogue devices for all demersal trawlers targeting cod operating in NAFO RA.
  - The time area closure for Division 3M (Flemish Cap) from January to March 2026 to protect spawning aggregations of Cod, with fishing activity on cod allowed from April to December despite the significant impact on the fishing companies operations.
- R4. Notwithstanding the above, the LDAC urges to the SC to assess the effectiveness of the technical measures and impact on both changes in fishing exploitation patterns and the observed recovery of the stock, as well as advance in knowledge of stock behaviour in terms of potential changes in distribution and migratory patterns as a result of the combination of environmental factors and decrease of fishing pressure during spawning season, looking at what is happening in adjacent areas such as 3L.
- R5. The LDAC reiterates its request made at its 2023 and 2024 advice that a scientific protocol should be set in place by the SC with a sampling plan to conduct selectivity trials for both collecting data and testing the effectiveness and impact of the use of sorting grids in the reduction in catches of juvenile and small cod.
- R6. The LDAC is pleased to see that the SC has developed guidelines for a sampling plan and design to bring statistically results that can be validated scientifically. However, it is still concerned of the slow progress in the implementation side and the fact that no analysis has been carried out to date on the effectiveness and impact of these flanking measures. The LDAC therefore strongly encourages the EU to give priority to the implementation of a fully-fledged sampling plan as soon as possible and no later than 2026.



The EU trawl fleet targeting cod active in the area reiterates its willingness to collaborate and volunteers to explore possibilities to conduct this exercise with scientists including the use of fishing units with twin trawl which might be of interest for gathering data and comparing results in a sampling plan.

R7. The LDAC supports the EU to consider the SC proposal of conducting a full assessment of Atlantic cod in Division 3M every two years, starting in June 2027, since biological parameters and the stock status have remained relatively stable in the last years. The LDAC notes that this process should be linked to data availability collected from EU-Spain and Portugal scientific surveys being fully available and analysed to avoid unforeseen fluctuations. As a safeguard, the LDAC agrees with the caveat that the stock will be monitored via IMR in interim years (e.g. 2028) and an assessment can be triggered by Scientific Council if changes are observed. This two-year window should be also an opportunity to smoothly integrate the evaluation of the impact and efficiency of the flanking measures on the recovery of this stock into the assessment.

# 2. Yellowtail Flounder Divs. 3LNO (TACs 2026 and 2027)

# 2.1. <u>Summary of scientific advice: stock status</u>

This stock was evaluated using a Bayesian production model. The stock is placed in the Healthy Zone in accordance with PAF. The biomass of the stock is above Bmsy with a probability higher than 99% and has been between 1.3 and 1.5 x  $B_{msy}$  with a very low risk (under 1%) that the stock will be below Btrigger or that the current F will be greater than Flim = Fmsy or Ftarget = 1. Recent recruitment has been higher to the average since the end of the 2010s.

The medium-term projections (2026-2028) were made assuming that the catch in 2025 would be equal to the approved TAC. In recent years catches have been lower than the approved TACs due to different reasons.

The SC projected the F scenarios defined for the stocks in the Healthy Zone in accordance with PAF. The following F scenarios have been projected in 2026 and 2027: F=0, and the three levels defined for stocks in the Healthy Zone, (75% Fmsy, 85% Fmsy=Ftarget and Fmsy=Flim). At the end of the projection period, the risk of biomass being below Blim is less than 1% in all scenarios, with a risk of biomass lower than Btrigger equal or less than 4% for all cases.

For the projections with 75% Fmsy the probability that F > Flim is between 11% and 12% in the medium term; with 85% Flim is between 24% and 25%; and with Fmsy probability rises until 50%. The probability that the biomass in 2028 will be higher than in 2025 is between 11% and 70% in the different projections.

Fishing mortalities higher than 75% Fmsy has a probability of decreases in biomass towards Bmsy between 2025 and 2028 estimated between 15% and 23%.



Considering that all F scenarios projected will likely maintain the stock above Btrigger with a probability of 96% or higher, the SC recommends applying Ftarget corresponding to a level of catch of 24 290 t and 22 000 t in 2026 and 2027, respectively. This level of catch has a risk lower than 25% to exceed Flim.

# 2.2. <u>LDAC technical considerations</u>

- The LDAC is pleased that the SC managed to complete a full and robust assessment this year following the data gaps in previous years as a result of the information problems from Canadian surveys and the uncertainty on the levels of recruitment.
- The LDAC is pleased with the positive outcome of the advice moving beyond the precautionary approach to a specific analytical advice.

# 2.3. <u>LDAC Recommendation for yellowtail flounder 3LNO</u>

R1. The LDAC supports the SC advice without any further comments.

# 3. White hake Divs. 3NO and Sub. 3Ps (TACs 2026 and 2027)

# 3.1. Summary of scientific advice

- The management unit for which advice is sought is Div. 3NO, which is part of a stock distributed in Div. 3NOPs.
- During the NAFO Annual Meeting of 2024, the Commission asked that, in June 2025, scientific assessment was completed for setting a TAC for 2026 and 2027. However, the position of Designated Expert (DE) for this stock got vacant due to early retirement in March 2025 and was not replaced, so a new full assessment was not possible. Therefore, the advice for white hake 3 NO is based on an IMR.
- This stock remains being data poor. Its assessment is done qualitatively based on the trend of surveys and catches and is associated with high uncertainty. The IMR concluded that there was no significant change of the stock status.
- The status of the stock is unknown. There is increased uncertainty in current stock trends given recent survey challenges and the lack of complete conversion factors for the Canadian surveys.



In view of the above, the SC reiterated the advice from previous year, namely that white hake catches in 3NO should not increase above recent levels measured as the average of the last five years, i.e. around five hundred (500) tons.

#### 3.2. LDAC technical considerations:

- The EU fleet active in the area notes that this stock is found mainly within Canadian EEZ, so it would be worthwhile to investigate if this stock is part of a bigger one present in Canadian EEZ or is a separate one. New findings might have implications in terms of ownership and management of the stock, as NAFO can only cover those within its RA.
- The EU fleet active in the area notes that there is not a directed fishery on this species and is only caught as by-catch of others such as silver hake. However, there has been a slight increase in catch particularly in the first quarter of 2025, being catch levels variable by nature and linked to peaks in recruitment. This species is often caught mixed with silver hake, having a good market price.
- The LDAC notes the lack of data for this stock but highlights that the fishing vessels, when they encounter catch of white hake, apply the "move on" rule. This creates problems of fishing effort displacement with sudden influx of those non-targeted species.
- Although it is a complementary stock to other targeted species of the Spanish fleet, it is not less important to establish at the forthcoming NAFO Annual Meeting some guidelines so that the SC can evaluate it. The important point is that the improvement of the stock (without having a scientific evaluation to corroborate it) is causing a problem of activity by which the vessels must be avoiding fish much more abundant than what the formula indicates, demonstrated by the reports of the control observers, which confirm a continuous application of the "move on" rule due to excess of catch for this stock.



#### 3.3. LDAC Recommendations on white hake Div. 3NO (TACs 2026 and 2027)

- The LDAC regrets that the SC has not been able to deliver a full advice this year as requested by the Commission but understands the reasons provided and asks the EU to raise at NAFO Commission the need to ensure adequate and sufficient human and resources capacity to deal with this and other assessments assigned to SC. The LDAC encourages SCS to collect additional data to improve quality and reliability of the stock assessment in future; and looks forward to a full assessment of this stock in 2026.
- As in previous years, the LDAC reiterates its agreement with the SC IMR resulting in a recommendation of "no increase in catches" for 2026 and 2027 which are stable in the region of 500 t in average of the most recent five years.
- The LDAC suggests that the NAFO Secretariat produces a scientific report documenting the data drawn from the control observers' reports with the times when the fishing vessels have applied the "move on" rule and an analysis of these data take place.
- The LDAC would like the EU to submit a question to the SC on the possibility to study stock mixing or migrations within the Canadian EEZ, to find out if white hake on 3NO is a separate species from that of 3P.
- The LDAC would like to ask SC to look at the correlation between increase in biomass and reported catch with a proposal for TAC increase in future years.
- 4. Redfish Div. 30 (TACs 2026, 2027 and 2025)

# 4.1. Summary of scientific advice

- This stock is considered data poor.
- The trends-based assessment has been done on a qualitative basis and is based on surveys and catch. It is associated with a high uncertainty. The Blim was revised with respect to that accepted on the 2022 assessment.
- The stock is in the Critical Zone. The biomass is below Blim with a probability of 62%. F was higher than Ftarget (58%) and Flim (53%). Recruitment in 2024 was above median length since 2014 but the short time series undermines confidence in the interpretation as a significant trend.



As stock population has decreased since 2012 and there is a 62% probability to be under Blim in 2024, to be coherent with the PAF, the SC recommends no direct fishing in 2026, 2027 and 2028, with by catch being kept at the lowest possible level.

#### 4.2. LDAC technical considerations

- The LDAC notes that total estimated catch for this stock has remained stable at very low levels (catch under 3 000t out of the overall TAC of 20 000t) in the last years.
- The LDAC signals that stock assessment is quite uncertain, due to lack of Canadian surveys conversion factors, showing significant oscillations in catch variability among survey hauls.
- The LDAC is concerned that level of catch by Canada of the adjacent stock within its EEZ might have an impact on the status of the stock in NAFO RA.
- The LDAC reminds that the average catch levels during the period used to calculate the MSY proxy (1998 -2024) was around 9 000 t. The LDAC also reminds that the SC could not provide an advice on a level of TAC appropriate for 2023, 2024 and 2025.
- The LDAC notes that the NAFO WG RBSM has asked the Scientific Council to review the advice given for this stock in June 2025 and provide other management options than the "non-directed fisheries".

#### 4.3. LDAC Recommendations for redfish 30

R1. The LDAC is concerned of the SC proposal of closing a targeted fishery for this stock, which deviates from previous advice (not able to provide a TAC). This proposal is quite restrictive and leaves little room to negotiators, as would mean to move from a TAC of 20 000t to zero. In view of the uncertainty of this scientific advice (trends-based qualitative stock assessment with some problems with the survey indices used) and in order to mitigate the severe socio-economic impact of a "zero TAC), the LDAC would ask the EU to request maintaining this fishery open looking for a reduced TAC commiserate with the average level of catch in recent years (i.e. between 3000 and 4 000t). This would allow to maintain relative stability and allocation keys for EU countries.

R2. As a compromise, the LDAC would propose, similarly as for other stocks such as Redfish 3M or thorny skate, to decrease the TAC but not alter the quota allocation among CPCs that target this stock by introducing a safeguard a footnote as follows: "Should catches exceed 4 000 t, additional measures should be adopted for further restrain level of catch in 2026".



#### 5. Redfish 3LN (TACs 2025 and 2026)

#### 5.1. Summary of scientific work / advice

- There are two species of the genus Sebastes with distribution overlapping in several
  areas of Northwest Atlantic, namely on the Gulf of St. Lawrence, Laurentian Channel, off
  Newfoundland and south of Labrador Sea: the deep-sea redfish (Sebastes mentella),
  with a maximum abundance at depths greater than 350m, and Acadian redfish (Sebastes
  fasciatus), preferring shallower waters of less than 300m.
- This is a qualitative assessment with no reference point regarding Flim value. Regarding biomass, the stock has decreased since 2015 and there is a 42% risk of the stock being below Blim in 2023.
- The next assessment for this stock is scheduled for 2026. To make the stock assessment,
   a mixed approach was used combining the survey indexes result of the median of the
   Spanish surveys in 3L y 3N and the spring and autumn Canadian surveys in 3LN. The
   projections have not been carried out due to the rejection of this model.
- Work is ongoing to develop an MSE for this stock. In absence of reference points as a
  result of the flawed model, until the MSE is completed, a provisional Blim has been
  adopted using a median of the period 1991-2005 with a combined survey index.
- Regarding MSE (CR3), at the SC meeting in January 2025, it was agreed to stop the MSE process given the results of the Operating Models (OMs) analyzed. Subsequently, at the next WG RBMS meeting, additional information was tabled in a preliminary document on development of a simple production model for possible use as OM for the MSE for this stock. It was agreed that more details on this model would be given at the forthcoming SC meetings. In June 2025, the SC examined the latest work and, although useful to explore future progress, the model was not considered fit for purpose at this stage.

As a result, the SC has conducted an IMR reiterating the advice from previous year of non-directed fishery.

- Despite the limited knowledge on the state of the stock since 2019, available data indicate that:
  - o Biomass is within or below the long-term median.
  - Stock seems to be above the provisional Blim,
  - Recruitment (measured as individuals between 15 and 20 cm) has been below the long-term median since mid-2010s for the four surveys analysed (Canadian spring and autumn and EU-Spain surveys in 3NO y 3L).



# 5.2. LDAC technical considerations

- The LDAC shows concern on the stagnation in the process of developing an MSE which should be the basis for future advice on this stock.
- The LDAC regrets that this qualitative assessment model run in 2024 is not sufficiently robust or solid as is based on survey biomass indexes which have a lot of gaps amongst others due to Canadian changing of vessels and inability to define conversion factors to the new vessels and EU-Spain for 3L. The LDAC notes that the interval of uncertainty is considerably higher than in previous years estimations, with an "ad hoc" approach.
- The LDAC is surprised on the reiteration of the "non-directed fishery" recommendation made by the SC on the basis of the stock assessment which is highly uncertain. As it is a reiteration of the advice from previous year, the former precautionary approach framework (PAF) was applied. With the same data and the new PAF, it would reflect that the biomass is currently under the Cautious Zone and not the Critical Zone.
- The SC acknowledges that redfish are known to have variable and episodic recruitment, with potentially large periods of time between recruitment pulses and poorly understood relationships between stock size and recruitment. Impacts of delineations of stock boundaries and synchronicity between adjacent stocks are also unknown.
- There is partial overlapping fishery of cod Divs. 2J3KL which has now reopened since 2025. If European vessels are impeded from conducting directed fisheries towards redfish Div. 3L just as they become theoretically able to catch cod in the same area, then it becomes much harder to properly utilize the reopened cod quota.

#### 5.2. LDAC Recommendations for Redfish 3LN

R1. Due to the reasons expressed above, the LDAC considers the stock assessment flawed due to the high uncertainty and asks that a "statu quo" approach is established with a TAC consistent with that of previous years or slightly smaller until a MSE is developed for this stock. The SC recommendation of "no direct fishery" is deemed as disproportionate to the risk as the current assessment is very uncertain and this is a drastic measure with serious socio-economic consequences for those EU fleets targeting this species as a result of a "zero TAC." Furthermore, if the advice was made with the new PAF, the advice would have been different with the same data, as the stock is above Blim placed in the Cautious Zone and not the Critical Zone.



- R2. The LDAC would like the EC to keep the fishery open and propose maintaining catch limits within current levels as in previous years, with a footnote to revise this figure should catches exceed 6 000 t. This approach is fully consistent with that asked for other stocks such as redfish Div. 30, thorny skate, or white hake.
- R3. The LDAC notes that there is limited knowledge of the state of the stock and uncertainties associated to the change of model but a no directed fishery is considered as a wrong application of precautionary approach, putting a disproportionate burden on those affected fleets. In this regard, the LDAC notes that catch levels from EU fleet have remained stable in the last 5 years in the region of 11 000 t and the quota for the EU has been fully utilized in the last years.
- R4. The LDAC considers the ongoing work very important to develop an MSE for this stock and believes that no drastic decisions should be taken until this work is completed.
- R5. The LDAC asks the EU to propose that the Commission formulates a question to the SC at the Annual Meeting to provide an updated review of the state of the 3LN redfish in light of the improved signals of biomass. The SC should clarify if applying the new PAF does not require necessarily to recommend a non-directed fishery.

#### 6. Greenland Halibut (GHL) in Sub. 2 and Div. 3KLMNO (TAC 2026 via the MP)

#### 6.1. Summary of scientific advice

- The present HCR is now called Management Procedure (MP) following the review of the MSE process in 2024. The new HCR was adopted by the NAFO Commission at the Annual Meeting in 2024 to calculate TACs for GHL in the Subarea 2 + Div. 3KLMNO. The HCR is based on the biomass indexes from scientific surveys and has two components of the biomass used to calculate the TAC: one based on the biomass to be achieved ("target") and the other on the trends shown by the surveys ("slope"). The final annual TAC is the result of the mean average of the estimation of TAC from both "target" and "slope," with the restriction of not allowing a TAC variation of ± 10% between consecutive years.
- The survey indexed upon which the HCR for the calculation of the TAC for 2026 is applied are based on four surveys: Canadian autumn survey in Divs. 2J3K; Canadian autumn survey in Divs. 3LNO; European survey in Flemish Cap in Div. 3M; and Spanish survey in Div. 3NO.
- Exceptional circumstances are continuing to occur due to gaps in values of surveys. The sensitivity analysis indicated that excluding these surveys has had a minimal impact (below 5%) in the result of the MP so will still be appropriate.



In view of the above, the SC advice derived from the application of the MP adopted in 2024 is a TAC of 14 729t for 2026, in comparison to 14 827t from the previous year.

#### 6.2. LDAC technical considerations

- The LDAC notes the considerable reduction in fishing effort made by the fishing fleets (mainly EU) before the HCR entered into force in 2010, with a decrease in catches from a peak TAC of approximately 40,000 t in 2000-2002 followed by a big reduction effort during the period where the recovery plan was implemented between 2004 and 2010. The current ceiling is now established just below 15 000 t.
- Notwithstanding the above, and despite the starting point being set at low levels, the LDAC considers that the HCR/MP is proving effective in providing stability and longterm planning to the management of this fishery.
- However, it notes that the application of the MP as currently designed has implied a 15% decrease of the TAC since 2020, and the present advice of 14 729 t constitutes the lowest quantity in the history of management of this stock, as it has been the case of the previous years.
- The Spanish and Portuguese trawl fleet industry note that it seems to do not reflect the real situation in the fishing grounds, where they find all group ages of GHL in abundance in their trawls, showing a disparity between catch reports from fleets and scientific survey. One possible explanation could be attributable to the size and wide distribution of the stock. The scientific surveys only cover some sample areas and are an average of four different surveys with different weights.
- The LDAC is concerned on the definitive exclusion of the Canadian spring surveys for Divs. 3LNO from the analysis. This follows the data gaps from the period 2020-2023 as a result of change of research vessel. The LDAC notes that the area and time where this survey takes place correlates with the best time and area (Divs. 3LN) to fish where more catches are reported by the commercial fleet.

#### 6.3. LDAC Recommendations for Greenland Halibut 2+3KLMNO

# R1. In the medium and long term, given that:

- The stock status is stable
- The management objectives have effectively changed in terms of reaching Bmsy by a deadline (from 2027 to 2037 and 2047 in recent years)
- There have been data gaps resulting in the occurrence of exceptional circumstances due to lack of scientific surveys from Canada and Spain in some of the last five years.
- There is an expectation that exceptional circumstances will end due to inclusion of Canadian and Spanish scientific surveys from next year on.



- Assessment points out in a future increase in catch
- Current catch levels are around 3% lower than the TAC.
- Next revision and uptake of assessment will take place in 2027 with an in-depth review in 2030.

The LDAC asks the EU to propose NAFO Commission to launch a study in 2026 to assess the effectiveness and adequacy of the management procedure for GHL, including management objectives so it is in time for the review of the stock assessment in 2027 or 2030.

# 7. Northern Shortfin Squid in Subareas 3+4 (TACs 2025, 2026 and 2027)

#### 7.1. Summary of scientific advice

The assessment for this stock has been deferred again until the Annual Meeting in September 2025. The SCS made a recommendation in 2019 which was then maintained for the period 2020—2023: The primary biomass index (Div. 4VWX) and mean body size value for 2018 were not available for use in the assessment. The 2019 values indicated that the stock may be moving towards a high productivity period. SC advice is a TAC of no more than 34 000 tones/year. The management decision was to set up a TAC in line with the SC recommendation (i.e., 34 000 t/year) with a roll over in the following years.

#### 7.2. LDAC technical considerations

- The LDAC notes that, in terms of fishing dynamics, since the nineties, the squid fishery has been mainly a seasonal one with low level of catches (currently slightly above 100t).
- However, there are Spanish vessels represented in the LDAC which have become more
  active in the area targeting squid during the last years and are interested to keep this
  fishery open.
- The LDAC looks forward to having the interim monitoring for this stock prior to the Annual Meeting so a sound management decision can be made.

#### 7.3. LDAC Recommendations for Squid in Subareas 3+4 (Illex illecebrosus):

R1. Pending of the outcome of the SC and the scientific recommendation in September and should no significant changes occur in the state of the stock, the LDAC advises that the European Commission should consider requesting a rollover of 34 000t for this stock considering the socio-economic importance of this fishery for the Spanish cephalopod freezer fleet.



#### 8. Northern cod 2J3KL

#### 8.1. Background

- In 2024, Canada re-opened a commercial fishery for Northern cod in NAFO Divisions 2J3KL, effectively ending the 32-year moratorium. This decision also resulted in the de facto reopening of the fishery in international waters subject to NAFO's Regulatory Area (RA). However, the LDAC notes that, in practice, this stock had remained closed only for non-Canadian vessels in international waters. Within the Canadian EEZ, the fishery had been accessible to Canadian vessels since at least 1998 under so-called "stewardship" quotas, individual licences, or other schemes. This meant that the fishery was re-opened to Canadian vessels just six years after the moratorium was imposed.
- From 1998 to 2023 (except for a short closure between 2003 and 2005), Canada's "stewardship" quotas for Canadian vessels alone amounted to almost 160,000 t<sup>1</sup>. This level of harvesting raises serious concerns regarding its contribution to the delayed recovery of the stock.
- On 18 June 2025, Canada adopted a catch limit of 38,000 t for its vessels for the period 1 July 2025 30 June 2026. Subsequently, on 23 June 2025, NAFO adopted a TAC for this stock for the same period, including an allocation of 5% of the TAC to other NAFO Contracting Parties (CPs), such as the European Union, to be fished in the NAFO Regulatory Area. NAFO also maintained the existing recovery measures for the stock for that period.

# 8.2. LDAC technical considerations

- The LDAC considers it critical that any directed fishing activities for this stock by CPs in the NAFO Regulatory Area are conducted within a robust management framework and under a level playing field that ensures both the long-term conservation of this important resource and respect for the historical fishing rights of all CPs in the area.
- For 22 years, Canada not only disregarded the moratorium on Northern cod but also increased catches year after year. For example, the TAC rose by 25% from 9,500 t in 2018 to 12,350 t during the 2019–2021 period. In 2022 and 2023, Canada further raised its "experimental" TAC to nearly 13,000 t.

<sup>&</sup>lt;sup>1</sup> https://fisheryprogress.org/sites/default/files/indicators-documents/2J%203KL%20Northern%20Cod%20Rebuilding%20Plan%20Dec%2021%2020 0.pdf



- Moreover, it seems that there was also a significant level of unreported catches and discards that should be taken into account when assessing Canada's overall removals of cod 2J3KL during the moratorium<sup>2</sup>.
- These actions may have slowed the recovery of the stock, thereby postponing the reopening of the fishery for other CPs.

#### 8.3. LDAC recommendations for Northern cod Divs. 2J3KL

R1. This fishery is of high importance to EU cod trawl fleets. The overall TAC for this area now exceeds that of 3M cod, and its significance is increasing given the EU's small quota in the Barents Sea, which is likely to be reduced again next year.

R2. Canada should be reminded that, irrespective of the terminology used ("stewardship fishery" or otherwise), the reality is that it set unilateral TACs amounting to almost 160,000 t over a 22-year period, conducting targeted fishing in an area under moratorium. In this regard, the EU should not exclude the option of asking Canada to provide compensation to all CPs that refrained from this fishery during the moratorium. The level of such compensation should be calculated based not only on the TACs unilaterally set by Canada but also on unreported catches and discards within the Canadian EEZ.

# 9. Thorny skate in Divisions 3LNO and Subdiv. 3Ps (TAC 2025 and 2026)

#### 9.1. Summary of scientific advice

 No new survey information is available to determine stock status. However, given the low level of thorny skate catch in recent years (average 3 460 t, 2019 - 2023), it is unlikely that there have been major changes to the state of the stock.

- Given the low resilience to fishing mortality and higher historic stock levels, Scientific Council advises no increase in catches.
- Due to a lack of reference points and limited recent surveys the current status of the stock is unknown. Catches remain stable.
- In previous year a TAC for 2026 was fixed. The review of the available data through and IMR confirms the scientific advice done.
- The next full scientific assessment is planned for 2026.

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<sup>&</sup>lt;sup>2</sup> See pages 6 and7 of the Report of the Standing Committee on Fisheries and Oceans (March 2017): <a href="https://www.ourcommons.ca/Content/Committee/421/FOPO/Reports/RP8826804/foporp10/foporp10-e.pdf">https://www.ourcommons.ca/Content/Committee/421/FOPO/Reports/RP8826804/foporp10/foporp10-e.pdf</a>



#### 9.2. LDAC technical considerations

- The LDAC notes that SSB was estimated to be above Blim in 2019 (last value of surveys)
  and the long-life trait of the species and stability in level of catch in recent years makes
  it not likely that there have been any substantial changes.
- The TAC adopted by NAFO for 2025-2026 for thorny skate in 3LNO Division has been of 7 000 t, and the distribution of the quota for this stock is as follows: European Union has 4 408t (63%); Canada 1 167 t (17%); Russia 1 167 t (17%); and others, 3%.
- Regarding the internal allocation within the EU, Spain has a quota of 3 403 t (77% of the total), with a declared consumption of quota close to 90%. Portugal has assigned 660 t (15%), and Estonia 345 t (8%).
- The SC has included again in their report the recommendation of "keeping the quotas close to the catches" and two important countries with quota do not use it: Canada has an independent skate fishery in 3PS within its EEZ and adjacent to 3LNO, over the same stock, but that is managed as a separate unit, and there Canada maintains unchanged since 1997 an independent quota of 1 050 t. There is also a small share for San Pierre et Miquelon, and Russia is not interested in the fishery.

# 9.3. <u>LDAC Recommendations to the EU for thorny skate in Divs. 3LNO</u>

- The SC acknowledges that the thorny skate stock has had a stable low level of overall catch levels (3500 t in average for the period 2019-2024). The SC also predicts that it is unlikely that there have been major changes to the state of the stock. However, given the low resilience of this species and higher historic biomass stock levels, the SC advice recommends not to increase catch. As in previous years, the LDAC reiterates its agreement with the SC recommendation of "no increase in catches" for 2025 and 2026 which are stable in the region of 3 500 t in average.
- However, the LDAC has diverging views on the specific translation into figures
  of the advice for the 3LNO portion as it cuts down the proposed TAC in half,
  from 7 000 t in the last years to 3 500 t for 2025 based on the average catch
  levels from 2019 to 2023.



- The fishing sector of the LDAC agrees with the catch limitation advice but not with the link between catch and TAC for this stock. They remind that the SC does not propose a TAC but "no increase in catches." This has been the case since 2013 with a TAC fixed at 7 000 t for Divs. 3LNO, considering that the catch levels are stable around 3 500 t and that the EU is the only CPCs having a directed fishing in the zone. Other CPCs (Russia and Canada) are not participating in this fishery and therefore do not have a real impact in the conservation of the stock. They remind the importance of the thorny skate 3LNO stock for some EU MS, in particular Spain, which do fully utilise its allotted quota since 2013. As a safeguard measure, the fishing sector of the LDAC is in favour of maintaining in the quota table the reference to Note 12 updated to 2025 as follows: "Should catches exceed 5 000 t, additional measures would be adopted to further restrain catches in 2025".
- The <u>NGO group requests</u> following the advice of the Scientific Committee that catches should not be allowed to exceed 3 500 t and supports setting the TAC accordingly.
- The LDAC encourage SC to collect additional data to improve quality and reliability of the stock assessment in future.

#### **SECTION II. ECOSYSTEM CONSIDERATIONS**

1. Ecosystem approach (CR1) Provide catch information in relation to 2TCI, including recent cumulative catch levels and a scoping of expected cumulative catch levels; and development of Stock Summary Sheets (SSS) for stocks managed under MSE (CR4).

# 1.1. Summary of scientific advice

The SC developed in 2023 a template on how to include Total Catch Index (TCI) information in the stock summary sheets (SSSs). This template includes a reference to the TCI in the summary table and a new section describing the sustainability of catches for the guild and EPUs to which the SSS stock belongs. These modifications have been implemented in the SSSs of the stocks assessed in 2023.



- The design of the SSSs already included a section for TCI information; this section has been updated to reflect the newly adopted framework and the ecosystem reference point.
- The LDAC notes that work is currently being carried out on tiers 1 and 2 of the Ecosystem
  Roadmap and that the next scheduled update of the Ecosystem Summary Sheets (ESSs)
  will be in 2027. The LDAC also notes the vacancies in Designated Experts for the ESSs
  coupled with ongoing challenges in the Scientific Council's workload.
- Regarding management considerations for occasions when the 2TCI ecosystem benchmark is exceeded, similar to those when Exceptional Circumstances are triggered within the MSE and Effective methods for communicating TCI-related information to the Commission, particularly for when the 2TCI is exceeded or expected to be exceeded.
- The SC notes that while catches above the 2TCI ecosystem benchmark are clearly
  associated with negative ecosystem outcomes, this high level of catch has been
  infrequent. This supports the treatment of these events as an analogous Exceptional
  Circumstances situation in the Management Strategy Evaluation.
- The SC identified several scientific and management considerations that are important in defining courses of action in the event of a 2TCl exceedance.
- To support WG-EAFFM discussions on possible management measures in the event that the 2TCI level is exceeded, and to regularly report TCI-related information to the Commission, the SC developed a report on the sustainability of catches at the ecosystem level to summarize information on the Catch/TCI relationship. The structure and content of these reports are expected to evolve based on discussions and comments from managers in the WG-EAFFM and the Commission.
- The recent monitoring of conditions on Ecosystem Production Units (EPUs) of the Grand Banks (3LNO) and Flemish Cap (3M) indicates that changes observed are in line with the trends already observed for these ecosystems, and therefore, do not comply with the criteria of "significant ecological changes" to activate an update on the Ecosystem Summary Sheets (ESS) out of deadline.
- The level of catch foreseen for 2025-2026 are kept below the reference point of 2TCI ecosystem for the Grand Banks. However, it is expected that catch of piscivores in Flemish Cap exceed the 2TCI limit in 2026, indicating a high risk of overfishing in the ecosystem.



- Due to the existing workload of the SC and the deferral of the assessment on SAI in VMEs aggravated by the current decrease in support to work of SC by the CPs, the SC asks the Commission to defer the next update of ESS, currently planned for 2027, until 2028.
- Progress made on drafting of Stock Summary Sheets (SSS) under stocks managed by MSE have been limited, due to the workload issues. Ongoing work will take place in coming years.

#### 1.2. LDAC recommendations on work on catch information related to 2TCI

 The LDAC wishes to request to the EU to reinforce the scientific capacity of the SC in this area and sponsor at least one European fisheries scientist to carry out the work of estimation of the 2TCl and the future update of the EESs.

#### The EU fleet fishing in NAFO represented in the LDAC:

- Supports the expansion of scientific capacity but not at the expense of fisheries single-stock assessment and management. If new scientific approaches are to be examined in the SC annual workplan, it cannot be at the expense of existing needs regarding traditional stock assessments. Prioritisation should be towards needed fisheries assessments that are not fulfilled due to lack of resources.
- Notes that NAFO does not have competence over all or even most matters that influence the ecosystems within its geographic area.
- Further notes that entities that have both the competence and the responsibility to assume ecosystem goals and responsibilities in their areas of sovereignty, like the coastal states that are parties of NAFO, are not developing such tools.
- Proposes the EU to suggest outsourcing or "spin off" this work into external scientific organisations (such as oceanographic institutes and/or universities) to undertake this work, freeing up resources to NAFO SC and allowing other bodies to apply for dedicated scientific funding, including EU funding.



#### The EU NGOs represented in the LDAC:

- Note that any decision regarding changes in the allocation of resources in the SC should be conditioned to the outcome of the ongoing discussions regarding NAFO's ecosystem operational objectives. It is these agreed objectives that should drive the work of the SC as well as the decisions regarding its funding.
- Also note that the work of the WG EAFMM is grounded in a roadmap. The current work of the SC on a single document describing and clarifying the roadmap, and the feedback from the managers, should be another step before taking any decisions regarding potential changes in the work of the SC.
- Would like to recall that implementing an ecosystem-based approach to fisheries
  management is a core objective of the CFP. In that regard, the pioneer work of
  NAFO through its ecosystem roadmap is a concrete example of such an
  implementation and should be considered by the EU as an example for other
  RFMOs.
- Would also like to highlight that a series of tools are available to progress towards an EAFM. From ambitious ecosystem modelling to single-stock assessments that incorporate ecosystem considerations (e.g. predator-prey relations, climate impacts) via multispecies assessments. Management strategy evaluations are also a unique opportunity to test the robustness of the HCRs against various ecosystem parameters. In brief, EAFM should urgently be progressed in several ways, and priorities should stem from the ecosystem operational objectives agreed by the managers.

# 2. Development of a document detailing a NAFO Roadmap for EAF for next 1-3 years (CR5)

#### 2.1. <u>Summary of scientific process:</u>

- The NAFO Roadmap for an EAF allows NAFO to fulfil with its commitment of an Agreement to implement an ecosystem approach to manage the fishing resources.
- Even though this framework has been already described and recognized in several NAFO documents, there is not a single document formally adopted by the Commission providing a detailed description of the NAFO Roadmap on this field.
- This lack of formal recognition is creating difficulties to communicate this work, both internally and externally.



- Given the present difficulties, the SC has fast tracked the issuing of a detailed draft
  of this Roadmap requested by the Commission and will seek feedback from
  managers at the WG EAFFM meeting in 2025.
- Comments and feedback received by managers will be used during the SC meeting in September 2025 to decide on next steps in developing this document.

#### 2.2. LDAC recommendations on an Ecosystem Roadmap for EAF in NAFO:

- The LDAC supports the work carried out this year by the SC and the progress made towards a single document that is clear and includes objectives and a time plan with clear targets and deliverables. With this in view, the LDAC would like to ask the EU to support that the work is included in the work plan of NAFO as a priority with the view of adopting it no later than 2027.
- Regarding ongoing discussion at WGEAFM on ecosystem operational objectives, legal
  clarity will be needed to understand if the definition of objectives can be done
  separately from NAFO CEM in order to avoid issues of interpretation or law conflict in
  the future.
- LDAC suggests that the work currently under way in NEAFC on agreeing on ecosystem and biodiversity operational objectives should be looked at in order to inform NAFO's work on the matter.

# 3. Work towards the reassessment of VMEs and impact of bottom fisheries on VMEs for 2027 (CR6)

#### LDAC technical considerations:

- The LDAC supports the WG-EAFFM recommendation that the Commission request the SC to provide management options as part of the reassessment of bottom fishing to be discussed in 2025.
- The SC recommended that every effort to be made to minimize sampling impacts and maximize data collection on catches made in vulnerable areas.



#### LDAC recommendation on impact of bottom fishing in VMEs:

 The LDAC concours with the WG-EAFFM recommendation for the SC to provide management options as part of the reassessment of bottom fishing to be discussed in 2025.

# Diverging positions on impact of bottom fishing in VMEs:

- The <u>LDAC fishing industry</u> reiterates that impacts from bottom trawl scientific research surveys are not considered to cause long-term damage to VMEs due to their small area of influence and long recurrence interval. Evaluation of the exclusion of closed areas from research surveys indicated that indices of some stocks would be affected, making them unreliable for conducting scientific advice in future. In addition, these research surveys also play a key role in monitoring conservation objectives of protected area valuable and necessary for accurate and reliable scientific data collection.
- The LDAC NGO Group emphasises that any bottom trawling in closed VMEs should be avoided including for bottom trawl research surveys as these areas have been closed to bottom trawling for the reason of protecting them against the impacts from this fishing gear and reiterate that scientists continue to warn that the first trawl causes the biggest damage. Therefore, even limited experimental trawls could cause long lasting damage and once again destroy any recovery achieved from closing these areas. Furthermore, the NGOs highlight that the overall low percentage of sea bottom closed to bottom trawling as VMEs should not be considered to be elementary for stock indices and stock assessments and that monitoring of conservation objectives might be better done by monitoring abundance and data from adjacent fishing areas instead, improving sampling quality and reporting of discards from these. The NGOs therefore request that the EU does not support reopening VMEs to any bottom trawling activities including for experimental surveys.



4. Monitoring and update on relevant research related to the potential impacts of activities other than fishing in the Convention Area, subject to the capacity of the Scientific Council.

The LDAC notes that the number of areas closed to fishing increases steadily but at the same time, Canada is making oil and gas exploration drills in closed areas.

# LDAC Recommendations on impact of activities other than fishing in NAFO CA

- The LDAC recommends that the protection of VMEs should expand to all human extractive activities, despite NAFO being a fisheries organisation. NAFO is one of the RFMOs leading the way in the implementation of an ecosystem approach so this cannot be ignored.
- The LDAC recommends that the work conducted by IEO-CSIC (EU-Spain) in previous years developing charts with all available information on existing human activities and pressures in NAFO CA. It was presented and discussed at WGEAFFM. The LDAC requests both Spain and the EU that continue supporting this work in future and caters adequate funding to gain a better understanding of both the overall (cumulative) effects and the individual (relative) impacts that these human extractive activities have on the seafloor and the ecosystem in general.

#### SECTION III. MONITORING, CONTROL AND SURVEILLANCE CONSIDERATIONS

# **LDAC Recommendations on Monitoring, Control and Compliance (STACTIC):**

#### **General Recommendations on MCS:**

- The LDAC advises the DG MARE negotiation team to regularly inform on the state of play of the above referred discussions that will likely continue at the next STACTIC to be held during the NAFO Annual Meeting.
- The LDAC also request that the above-mentioned items are included for discussion at the coordination meeting between the EU and the stakeholders held mid-week, as any potential measure adopted could have an impact for the fishing vessels' operations.



#### **Specific recommendations on MCS:**

# Review of observer coverage:

- If there is a reduction from 100% observer coverage and EMS/REM is introduced, the LDAC would like to see the implementation of a transition period to implement these changes on a voluntary and stepwise approach.
- The LDAC agrees that a combination of both human observers and EMS providing 100% coverage would be the aspiration for ensuring adequate control and compliance of all fleets. However:
  - The <u>fishing sector of the LDAC</u> expresses its preference for the physical presence of observers onboard commercial vessels operating in NRA as EMS/REM has still many technical and operational loopholes which hampers its effective implementation and the way to provide information to NAFO Secretariat and the SC.
  - The <u>NGO group</u> supports that there should be full coverage of all fleets, species and areas using both human and EMS and not an either/or only. Ideally, EMS-REM should supplement human observer coverage until EMS is fully developed and proven to achieve comparable results for both target and bycatch species monitoring.

-END-