

## **Recommendation n° 24:**

### **Amendments to the document “Azores Ecoregion – Ecosystem Overview” produced by ICES**

According to the document, Azores ecoregion – Ecosystem overview, from ICES, published on December 9, 2021, the Outermost Regions Advisory Council (CCRUP) hereby requests the European Commission to take into consideration the following information:

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*Fisheries in the Azores are managed under the EU Common Fisheries Policy (CFP), with some fisheries managed by the North East Atlantic Fisheries Commission (NEAFC), the International Commission for the Conservation of Atlantic Tunas (ICCAT), and regional government. Fisheries advice is provided by the International Council for the Exploration of the Sea (ICES), the European Commission’s Scientific Technical and Economic Committee for Fisheries (STECF), The Outermost Regions Advisory Council (CCRUP), the South West Waters Advisory Council (SWWAC) and the Long Distance Advisory Council (LDAC). For large pelagic fish (tuna and tuna-like species) fisheries advice is provided by ICCAT. Environmental policy is managed by national agencies, regional government and OSPAR, with advice being provided by national agencies, OSPAR, the European Environment Agency (EEA), and ICES. International shipping is managed under the International Maritime Organization (IMO) and whaling is managed by the International Whaling Commission (IWC).*

It can be read: “*The most important pressures in the Azores ecoregion are the selective extraction of species non-indigenous*” We don’t consider that “*the selective extraction of species*” is the best expression to refer to the capture of species, precisely because it is a selective extraction that tries not to exert pressure on resources. We propose to consider only the term: “species capture”.

Also, on this page we can read that ICES considers "abrasion, straightening and loss of substratum" a pressure in the Azores. However, considering that trawling is

prohibited in the Azores, we think that only the anchoring of vessels may exert some occasional damage to the substrate.

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Where one can read: *“Fishing is prohibited below 800 m in the ecoregion.”* Regarding this statement, we must inform you that we are not aware of any regulation that prohibits fishing at this depth.

Where one can read: *“Other fisheries also occur seasonally in some coastal areas, such as the hand harvesting of littoral invertebrates and a trap fishery for benthic crustaceans.”* Regarding this statement we must add that fishing with traps is aimed at crustaceans, octopus, and red mullet.

Where one can read: *“Recreational fishing is a relatively important activity because of increasing levels of tourism.”*, we must mention that we disagree that tourism is the cause of the increase in recreational fishing, but rather the increase of illegal fishing through recreational fishing licenses. Tourism indirectly requires a greater amount of fish, which is provided by illegal fishing.

Where one can read: *“Out of those, it is only tunas that have an analytical assessment, with the other fished species managed under the precautionary approach.”* We continue to defend that it does not make sense for demersal and benthic fisheries in the Azores to be managed in a precautionary and non-analytical way, as the applied TAC's have a huge impact on the socio-economy of the region and the TAC's should have a more analytical basis need.

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Where one can read: *“Molluscs (*Patella* spp. and *Megabalanus azoricus*) have been heavily exploited commercially in the Azores ecoregion and are now on the OSPAR list of threatened and declining species.”* We note that according to the bibliographic reference of the document under analysis, in 2008, mollusc species such as *Patella* spp. and *Megabalanus azoricus* were added to the OSPAR list of endangered and declining species and considered heavily exploited in the Azores ecoregion. In relation to this point, we would like you to inform us about the actuality of this statement, as we are not aware

of recent studies on the situation of the populations of these species. That is, this information may be out of date for scientific and stock management purposes, so we suggest a review/update of it.

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Where one can read: “*The Azorean barnacle (Megabalanus azoricus), black sea urchin (Arbacia lixula), stony sea urchin (Paracentrotus lividus), bearded fireworm (Hermodice carunculata), Azorean limpet (Patella aspera), limpet (Patella candei), slipper lobster (Scyllarides latus), and lobster (Palinuros elephas) are the most abundant species in the intertidal as well as in the first few meters of the subtidal. The barnacle, limpets, and lobsters have been heavily exploited in the ecoregion; since 2006 two species are on the OSPAR list of threatened species.*” are the most abundant species in the intertidal zone, as well as in the first meters of the intertidal zone. Barnacles, limpets and lobsters were heavily exploited in the ecoregion; since 2006, two species are on the OSPAR list of threatened species.” Contradictions can be noted as they initially describe barnacles, limpets and lobsters as the most abundant species and then indicate that they are on the OSPAR list as threatened and declining species. Furthermore, we are not aware of recent studies on the status of populations of these species.

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Where one can read: “*Deep mid-slope at 800–1200 m: characterized by common mora (Mora moro), leafscale gulper shark (Centrophorus squamosus), birdbeak dogfish (Deania calcea), and gulper shark (Centrophorus granulosus).*” In other words, according to this statement, the Melga fish (*Mora moro*) inhabits depths between 800m and 1200m. Since this fish is caught below 800 m in the Azores, the statement “*Fishing is prohibited below 800 m in the ecoregion.*” is contradictory.

Where one can read: “*The state of fish stocks in the ecoregion is generally unknown, owing to the lack of analytical assessments.*” which we regret, therefore, the lack of recent scientific data about the state of the species stocks, confirms the urgent need to obtain them, as they are of high importance in the management of quotas and in the socio-economy of the sector.

Where one can read: “*Spawning-stock biomasses of bluefin tuna and swordfish have increased in recent years, and neither are considered to be overfished.*” It should be noted that it seems contradictory to us that bluefin tuna (*Thunnus thynnus*) is described in the OSPAR list (page 11) as a threatened and declining species, but on the other hand they claim that there has been an increase in stocks of this species.

Where one can read: “*Amongst the pelagic shark species occurring in the ecoregion, three are considered more significant and vulnerable to fishing: blue shark (*Prionace glauca*), shortfin mako (*Isurus oxyrinchus*), and porbeagle (*Lamna nasus*).*” We must inform you that the directed and by-catch of mako sharks and the directed catch of blue sharks are currently prohibited.

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Regarding the: «*Table 1 - OSPAR-listed threatened and declining species and habitats that occur in the Azores ecoregion.*» namely in relation to invertebrates, that they consider barnacles and the limpets (*Patella ulyssiponensis aspera*) to be threatened and in decline. However, on page 9 they mention that barnacles and the two species of limpets (*Patella spp.*) are abundant in the intertidal zone and in the first few metres of the subtidal zone. Once again, we note a contradiction in the information.

Also, according to the: «*Table 2 - Threatened and declining habitats in the Azores ecoregion according to OSPAR.*» the habitats of coral gardens and seabed sponge aggregations are threatened and declining. However, on page 9, they state that coral and sponge aggregation habitats are common in the region and cover extensive areas. Again, this information appears to be contradictory.

We recommend that Tables 1 and 2 on this page be updated to take into account the latest scientific studies.

Therefore, **the CCRUP recommends that the European Commission cooperate with ICES to update this report.**

The President of the Executive Committee of the CC RUP,

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(David Pavón González)

Praia da Vitória, 9<sup>th</sup> of February of 202