



Ms Charlina Vitcheva  
Director-General  
Directorate-General for Maritime Affairs and Fisheries  
European Commission  
1049 Brussel  
Belgium

Dun Laoghaire, 14 July 2020

Dear Ms Vitcheva,

**Subject: NWWAC Advice Brown Crab Management**

**Background**

In 2010, the European project ACRUNET was established. This transnational Interreg project was the formalisation of an ad hoc industry/agency/science group concerned with a number of issues – market, transport, quality – common to all brown crab stakeholders. Stakeholders from five EU Member States were involved including from Ireland, France, Spain, Portugal and the UK ([link](#) to ACRUNET). There were many substantial conclusions and outputs from ACRUNET but a major concern of the French partner, CNPMM, was the unresolved issue of comparable management of brown crab fisheries across the main producer countries UK, Ireland and France.

In a further effort to address the issue of transnational management the North Western Waters Advisory Council (NWWAC) agreed to facilitate the process by establishing the Focus Group Brown Crab (FG Brown Crab) in 2016.

The FG Brown Crab adjusted its Terms of Reference (ToR) in September 2019 to accommodate changing circumstances in the European brown crab industry for both fishery and market sectors. The revised ToR were “To develop recommendations on the development of an EU management plan for brown crab” to take account of a rapidly evolving industry, particularly in Asian markets. This revised objective was to be completed and presented at the NWWAC meeting in Ghent, July 2020.

However, this revision was, in turn, superseded by global events such as the COVID-19 pandemic, regulatory issues in the Peoples Republic of China regarding cadmium analyses for brown crab and the realisation that BREXIT would culminate with the United Kingdom (UK) being outside the remit of EU structures, such as the NWWAC.

It is also apparent that the original countries represented on the FG Brown Crab, i.e. UK, Ireland and France, are no longer the only stakeholders nor are the fishing waters confined to ICES Areas 6 and 7. Now the eastern North Sea (ICES Area 4) has become a significant hub with UK, Irish, Danish and at least one Polish vessel fishing and landing into the Netherlands and Denmark. These developments have contributed appreciably to the rapid growth of live crab exports to China and other Asian destinations.

New drivers of effort in European brown crab fisheries were identified as (1) price and demand; (2) increased effort by existing vessels and new entrants and (3) the Landing Obligation.

To develop recommendations, it was necessary to assess:

- The effects of these drivers on existing management measures,
- The effects of new measures such as certification and Fishery Improvement Projects,
- New data collection techniques and their effect on traditional scientific assessments,
- Scientific advice regarding management strategies which can be applied in all jurisdictions,

and it was agreed that a SWOT analysis of these drivers and their mitigation would be helpful.  
(See Annex 1 for SWOT Analysis)

At this point the original objectives of the FG Brown Crab – crab fisheries management better aligned with the French system of permits allocated and control of the fishing effort within limited geographical areas – are being developed in both Ireland and the UK. In Ireland the establishment of Regional Inshore Fishery Forums around the coast is moving to the next stage with the development of an Inshore Management Strategy which is considering issues such as access, pot limits etc. The MLS has been raised to 140mm following industry-led demand. There has been some transfer from demersal to pot fishing but there does not appear to be a surge in landings and it is too early to say if this is a growing trend or has now stabilised.

A similar development of regional coastal entities known as Inshore Fishery Conservation Areas (IFCAs) has occurred in the UK and has resulted in tailored rules for MLS and other localised management requirements. A further development is the “Future of Our Inshore Fisheries” project, recently launched with a set of comprehensive and realistic proposals for management of inshore fisheries. It is too early in this process to evaluate the long-term effects for the UK and wider brown crab industry, but it would appear to have significant potential for improved management of inshore brown crab fisheries.

Since the FG Brown Crab entered this final phase there are extraordinary changes taking place which are having global effects. These changes – BREXIT, COVID-19, uncertainty regarding regulatory issues in China (acceptable cadmium levels in crab) – are still unfolding and it is impossible to accurately predict the final outcome for the brown crab industry. While BREXIT may pose problems, it does not preclude further collaboration between the UK and neighbouring EU countries for managing brown crab stocks.

## Conclusions

Based on the work by its FG Brown Crab the NWWAC concludes:

- The individual vessel sectors, including both inshore (<12 metre) and offshore, of the brown crab industry, with regard to both fisheries and markets, cannot be dealt with in isolation. The fisheries now include substantial areas of the North Sea and mainland Europe is a major hub for landing and exporting, particularly live crab. As soon as possible, management measures will have to be developed on an appropriate scale in order to respond to the challenges posed by the different areas and fishing fleets.



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- A major issue for exporters to China and other Asian countries is the difference in regulation regarding heavy metals, particularly cadmium. This applies to all the exporting countries but Ireland, the UK and France have been individually excluded from Chinese markets for lengthy periods while Health Certificates and monitoring programmes are negotiated and re-negotiated. This situation creates enormous uncertainty along the entire supply chain and must be addressed.
- Strategies are needed, and fall-back plans must be developed to protect stakeholders when unforeseen events bring their industry to a standstill.

The NWWAC, with the support and endorsement of the North Sea Advisory Council (NSAC), advises and will take the initiative to establish a joint NWWAC, NSAC and Market Advisory Council (MAC) Focus Group to identify common difficulties and possible solutions to supply chain issues, including different regulatory measures between the EU and Asian destinations for brown crab exports. We seek the support of the European Commission and its agencies for this initiative.

Best regards,

Emiel Brouckaert

Chairman Executive Committee



## Annex 1

|  | <b>STRENGTHS</b>   | <b>WEAKNESSES</b>   | <b>OPPORTUNITIES</b>  | <b>THREATS</b>  |
|--|--|---|---|---|
| Price and Demand   | Higher price which feeds back to home markets  | Over-reliance on a market over which the FG countries have little control   | Has provided opportunities for new entrants to the industry   | Industry very susceptible to international events (such as being experienced 2020)  |
| Certification and FIPs   | Satisfies requirements demanded by new customers   | Different Certification systems may not be comparable and there may be undue credit given to certain Certification brands | Facilitate entry to new markets/maintain position in existing market /encourage and document quality improvements | The development of too many certification schemes dilutes the value and the market becomes confused as to what the objectives are |
| New data collection and effect on traditional scientific assessments | Data can be provided in a more timely manner and give industry more responsibility and understanding of the value of good data | The scientists may be more remote from the catching sector. Unintentional errors may not be apparent for longer periods   | Industry can have a more proactive role and understanding of management measures                                  | Very few  |
| Scientific advice for all jurisdictions                              | Would create a level playing field for all stakeholders  | Conditions in different jurisdictions vary widely so advice for all is not always appropriate                             | Different jurisdictions could cooperate on a variety of management and marketing issues                           | One-size-fits all approach could create unworkable conditions in a number of areas  |

Table 1. SWOT Analysis of Possible Effects of Recent Developments and Trends in the Brown Crab Fisheries