MarinTrust Standard V2

Whole fish Fishery Assessment

WF04 Sandeel in ICES Divisions 4a-c

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Table 1 Application details and summary of the assessment outcome

Application details and summary of the assessment outcome			
Name(s): Marine Ingredients Denmark			
Country: Denmark			
Email address: sap@maring.org		**Applicant Code:**	
Certification Body Details			
Name of Certification Body:		LRQA	
Assessor Name	**CB Peer Reviewer**	**Assessment Days**	**Initial/Surveillance/ Re-approval**
Sam Peacock	Jose Peiro Crespo	3	Surveillance 2
Assessment Period	Original approval date : March 2025 to March 2026. Variation request granted to extend approval date to April 2025 – April 2026 Justification : To align with ICES stock advice		
Scope Details			
Management Authority (Country/State)		EU (Denmark); UK, Norway	
Main Species		Sandeel (*Ammodytes marinus*)	
Fishery Location		FAO Area 27, ICES Divisions 4a-c	
Gear Type(s)		Midwater trawl	
Outcome of Assessment			
Overall Outcome		PASS WITH CLOSED AREAS	
Clauses Failed		NONE	
CB Peer Review Evaluation		PASS	
Fishery Assessment Peer Review Group Evaluation		PASS	
Recommendation		APPROVE WITH CLOSED AREAS	

Table 2. Assessment Determination

Assessment Determination
IMPORTANT NOTE: Sandeel in the fishery covered by this assessment is managed as four stocks. For two of these stocks, the most recent scientific advice recommends no catches in 2025. According to the MarinTrust whole fish assessment methodology, these stocks can remain "approved" on the condition that no catch is taken. Thus while the conclusion of this report is that the entire sandeel fishery in ICES Divisions 4a-c is approved, in practice <u>any catch originating from Sandeel Areas 3r or 4 cannot be used as a raw material for the manufacture of MT-certified marine ingredients</u>. As with the initial and first surveillance assessments, this second surveillance assessment covers the sandeel fishery in Sandeel Areas (SAs) 1r, 2r, 3r and 4, which are four of the seven SAs within the North Sea. Each area includes up to five sandeel species, but is assessed and managed as an assemblage. The sandeel areas were reviewed by a 2023 ICES benchmarking exercise, with the conclusion that no changes would be made. The main species of sandeel in terms of population and presence in the catch is lesser sandeel, *Ammodytes marinus*, which has been categorised as Least Concern by the IUCN Red List. All four of the other sandeel species have been categorised by the IUCN as either Least Concern or Data Deficient. Catch composition data made available since the previous surveillance does not indicate any substantial changes, therefore as previously this assessment also considers three Type 2 species: mackerel, whiting and herring. All of these species have also been categorised as Least Concern. None of the species covered by this assessment is present in the CITES appendices. As previously, the sandeel fishery in SAs 1r and 4 occurs in EU and UK waters, and in 2r occurs exclusively in EU waters. In all three areas the fishery is managed under the EU CFP and the UK Fisheries Act 2020. The majority of catches are taken by EU vessels, primarily the Danish fleet. Since March 2024, the UK has closed access to fishing within its territorial waters for all sandeel-targeting vessels, irrespective of nationality. This has caused some diplomatic friction, with the EU contending that the action represents a breach of post-Brexit trade agreements. The arbitration process has not yet been concluded. In SA3r, the majority of catch is taken by Norwegian vessels, and the stock is managed under two separate regimes (EU and Norway) which do not appear to coordinate quotas. Stock assessments and management advice are provided in all four SAs by ICES, and also by the Norwegian IMR in SA3r. Other than the closure of UK waters to sandeel fishing in 2024, there have been no substantial changes relevant to sections M or F since the time of the initial MT assessment, and the fishery continues to meet the requirements of these sections. Similarly, there are no significant changes in the status of the three Category C stocks, and the fishery continues to meet the requirements of Section C. The main issue arising in the initial MT assessment related to the practice of "quota flex", the ability of quota holders to transfer up to 10% of their TAC between years. In some years this has led to catches exceeding the TAC and the ICES advice, particularly in SAs 1r and 2r, and particularly in years where the ICES advice was for a relatively small or zero quota. At the time of the initial MT assessment, this issue was discussed with the applicant, who stated that the Danish sandeel industry was making efforts to resolve this issue, and additionally that ICES was preparing advice regarding the extent to which the practice can be considered precautionary.

The 2023 ICES benchmarking exercise carried out for sandeel included an analysis of the potential impacts of quota flex, concluding that it "marginally increased risk of SSB falling below B_{lim} (0.2% higher risk at F_{cap})". With regards to the MT requirements, this does not resolve the question of whether the clauses in A3 are met in years when quota flex causes catches to significantly exceed the advice.

Catches in 2023 and 2024 were in line with the ICES advice in all Sandeel Areas, and TACs for 2025 have similarly been set in line with the advice. In SA3r and SA4, this advice is for zero catch in 2025. In SA3r, the IMR has made an initial recommendation that the fishery be closed until the results of a spring acoustic survey can be analysed in May. For both of these sandeel stocks, the relevant Category A requirements are met only on the assumption that the closures will remain in place, and that the quota flex will not result in catches being taken despite the closure. Thus while sandeel from SA3r and SA4 remains approved under the MT requirements, in practice any sandeel caught in those areas should not be used to produce certified products, and such catches would be likely to affect the approval status of the fishery in 2026.

In all the other areas of Category A, the fishery continues to meet the requirements.

Overall, the assessor recommends the approval of this fishery be maintained, but re-iterates that any sandeel which originates from SA3r and SA4 in 2025 should not be used for the production of MT-certified products.

Fishery Assessment Peer Review Comments

I agree with the assessor's evaluation for sandeel caught in SA1r and SA2r. No significant changes in management have occurred, aside from the UK closures, which are appropriately addressed in the report. Although stock levels remain low, they are above Blim. Catches over the past two years have remained below the set TACs, and ICES advice appears to take into account the broader ecosystem impacts and the needs of dependent species.

However, we might consider withholding approval for sandeel from SA3r and SA4 until the fishery reopens, in accordance with the latest scientific advice. Although the fishery is technically restricted when stock biomass is low, the current "quota flex" system can lead to overfishing—an especially concerning risk for stocks that are below or near Blim.

Notes for On-site Auditor

Auditor should ensure that sandeel is landed from Sandeel Areas 1r and 2r only.

Auditor should confirm that sandeel is caught using midwater trawls only (i.e. no bottom trawls).

Table 3 General Results

General Clause	Outcome (Pass/Fail)
M1 - Management Framework	PASS
M2 - Surveillance, Control and Enforcement	PASS
F1 - Impacts on ETP Species	PASS
F2 - Impacts on Habitats	PASS
F3 - Ecosystem Impacts	PASS

Table 4 Species- Specific Results

List all Category A and B species. List approximate total percentage (%) of landings which are Category C and D species; these do not need to be individually named here

Category	Species	% landings	Outcome (Pass/Fail)	
Category A	Sandeel in Sandeel Area 1r (ICES Divisions 4b, 4c)	98-99%	A1	PASS
			A2	PASS
			A3	PASS
			A4	PASS
	Sandeel in Sandeel Area 2r (ICES Divisions 4b, 4c, and Subdivision 20)		A1	PASS
			A2	PASS
			A3	PASS
			A4	PASS
	Sandeel in Sandeel Area 3r (ICES Divisions 4a, 4b, and Subdivision 20)[1]		A1	PASS
			A2	PASS
			A3	PASS
			A4	PASS
	Sandeel in Sandeel Area 4r (ICES Divisions 4a and 4b)[1]		A1	PASS
			A2	PASS
			A3	PASS
			A4	PASS
Category B	No Category B Species			
Category C	Herring	<1%	PASS	
	Whiting	<1%	PASS	
	Mackerel	<1%	PASS	
Category D	No Category D Species			

[1] Note that while SA3 and SA4r do meet the MT whole fish criteria, they only do so while these areas remain closed to fishing. Please refer to the Assessment Determination and the relevant sections of this assessment for more details.

Table 5 Species Categorisation Table

Common name	Latin name	Stock	IUCN Redlist Category[2]	% of landings	Management	Category
Lesser sandeel	*Ammodytes marinus*	Sandeel Area 1r (central and southern North Sea, Dogger Bank)	Least Concern[3]	98 - 99%	Yes	A
		Sandeel Area 2r (central and southern North Sea)			Yes	A
		Sandeel Area 3r (northern and central North Sea, Skagerrak)			Yes	A
		Sandeel Area 4 (northern and central North Sea)			Yes	A
Herring	*Clupea harengus*	ICES Division 4 and Subareas 3a and 7d	Least Concern[4]	<1%	Yes	C
Whiting	*Merlangius merlangus*	ICES Division 4 and Subarea 7d	Least Concern[5]	<1%	Yes	C
Mackerel	*Scomber scombrus*	ICES Divisions 1-8 and 14, and Subarea 9a	Least Concern[6]	<1%	Yes	C

Species categorisation rationale

In the 2024 surveillance assessment of this fishery, no new catch composition data were available to necessitate changes to the species categorisation section. Two MSC certification reports for sandeel fisheries contain updated catch composition data for components of the sandeel fishery. The October 2024 Final Draft Report and Determination for the DFPO, DPPO and SPFPO North Sea, Skagerrak and Kattegat sandeel, sprat and Norway pout fishery[7] contains catch composition data for the Danish sandeel fishery from 2018-2022, and for the Swedish fishery from 2018-2021. These data report sandeel as making up, on average, 98.3% and 99.3% of the catch respectively. Species which consistently make up more than 0.1% of the catch (i.e. in the majority of years) are herring, mackerel, and whiting, matching previous catch composition data. Species which sometimes represent more than 0.1% of the catch are sprat, blue whiting, gurnard, and haddock.

[2] https://www.iucnredlist.org/
[3] https://www.iucnredlist.org/species/18155957/44738265
[4] https://www.iucnredlist.org/species/155123/4717767
[5] https://www.iucnredlist.org/species/198585/45097610
[6] https://www.iucnredlist.org/species/170354/6764313
[7] https://fisheries.msc.org/en/fisheries/dfpo-dppo-and-spfpo-north-sea-skagerrak-and-kattegat-sandeel-sprat-and-norway-pout/@@assessments

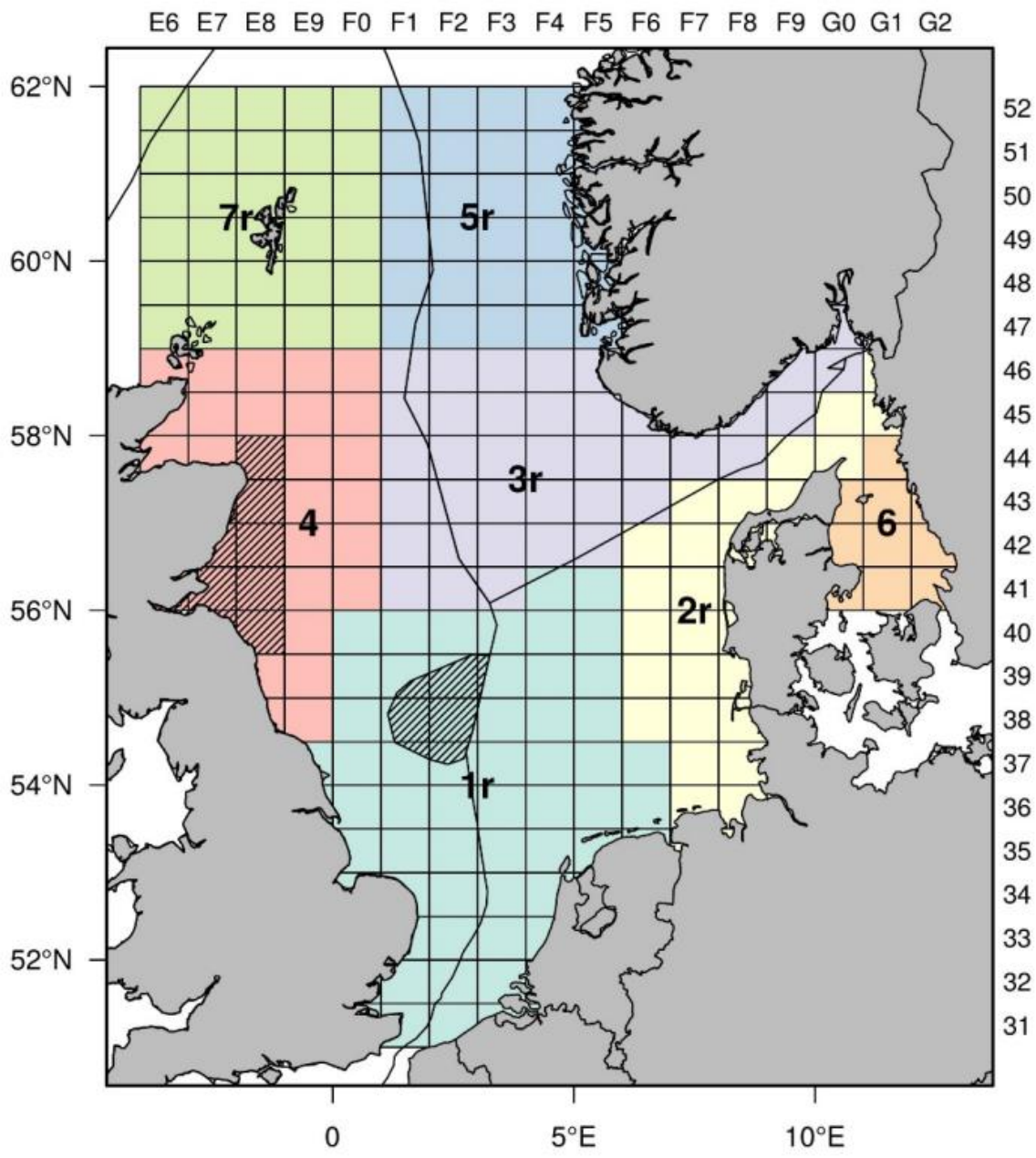
The December 2023 Public Certification Report for the Norway sandeel and North Sea sprat fishery[8] contains catch composition data for Norwegian vessels in 2019-2021. These data indicate that sandeel represented between 98.2% and 98.9% of the catch in those years, with a similar pattern of bycatch species as described in the DFPO report.

Overall, given that nothing in the new catch composition data significantly contradicts it, the assessor considers the appropriate approach to be to retain the species categorisations previously established for this fishery.

Sandeel Areas

Sandeel in the North Sea and adjacent waters are managed by the EU and ICES using six Sandeel Areas. At the request of the applicant, this assessment report covers Sandeel Areas 1r, 2r, 3r and 4. Catches in the other three areas are currently negligible, but in any case are not covered by this assessment. Each area is subjected to a separate stock assessment and TAC, and as such is considered separately in Section A.

[8] https://fisheries.msc.org/en/fisheries/norway-sandeel-and-north-sea-sprat/@@assessments



Map of the seven Sandeel Areas which delineate the assessment and management of sandeel into the seven stocks recognised by the EU and ICES. Closed areas shown with hatched markings. The UK, EU and Norwegian EEZs are also shown. This MT Whole Fish assessment covers SAs 1r, 2r, 3r and 4[9].

[9] ICES (2025). Sandeel (Ammodytes spp.) in divisions 4.b and 4.c, Sandeel Area 1r (central and southern North Sea, Dogger Bank). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202845.v1

MANAGEMENT

The two clauses in this section (M1, M2) relate to the general management regime applied to the fishery under assessment. The clauses should be completed by providing sufficient evidence to justify awarding each of the requirements a pass or fail rating. A fishery must meet all the minimum requirements in every clause before it can be recommended for approval.

M1	Management Framework – Minimum Requirements		
	M1.1	There is an organisation responsible for managing the fishery.	PASS
	M1.2	There is an organisation responsible for collecting data and assessing the fishery.	PASS
	M1.3	Fishery management organisations are publicly committed to sustainability.	PASS
	M1.4	Fishery management organisations are legally empowered to take management actions.	PASS
	M1.5	There is a consultation process through which fishery stakeholders are engaged in decision-making.	PASS
	M1.6	The decision-making process is transparent, with processes and results publicly available.	PASS
		Clause outcome:	PASS

There have been few changes in the management of the fishery relevant to this section since the previous surveillance assessment. The UK ban on sandeel fishing within its coastal waters from 26th March 2024 onwards (UK Gov 2024) remains in place. This remains a controversial decision, with the EU claiming that the closure breaches the terms of the post-Brexit Trade and Cooperation Agreement (TCA) and initiating an arbitration hearing in The Hague (UK Gov 2025). The assessor was unable to find any evidence to suggest that the ban has been breached by EU or UK vessels.

A summary of the outcomes of the initial MT assessment are provided here for reference. For full details please refer to the 2023 assessment report.

M1.1 There is an organisation responsible for managing the fishery.

Sandeel in the North Sea and adjacent areas is primarily fished by Denmark and other EU countries. In some Sandeel Areas (SAs), particularly SA3r, catch is also taken by Norway. Historically around 3% of sandeel catch is taken by UK vessels.

Fisheries in the EU, including Denmark, are managed according to the Common Fisheries Policy (CFP), which was most recently updated through Regulation (EU) No. 1380/2013. Individual member states generally incorporate the requirements of the CFP into their national legislation, and are individually responsible for its implementation. The CFP therefore sets out the policies and procedures by which member states manage their fisheries (EC 2018).

Fisheries management in Norway is the responsibility of the Directorate of Fisheries under the Ministry of Trade, Industry and Fisheries. Within the UK, fisheries management is a devolved issue. The body with over-arching responsibility for fisheries management policy is the Department for Environment and Rural Affairs (DEFRA), but the four individual nations also have their own management structures.

M1.2 There is an organisation responsible for collecting data and assessing the fishery.

The primary organisation responsible for coordinating and analysing the data relevant to the management of the sandeel fishery is the International Council for the Exploration of the Sea (ICES). ICES is an intergovernmental marine science organisation which provides frequent analytical and advisory services for the management of fisheries. ICES carries out annual stock assessments of sandeel in each of the SAs covered by this MT assessment, along with periodic benchmarking exercises to ensure the stock assessment process and its underpinning assumptions remain appropriate. Within SA3, which is largely within Norwegian waters, the Norwegian Institute of Marine Research (IMR) also collects data and conducts assessments. The IMR is affiliated with the Ministry of Trade, Industry and Fisheries and works closely with many of the ICES Working Groups.

M1.3 Fishery management organisations are publicly committed to sustainability.

Objective 1 of the CFP, as set out in Regulation (EU) No. 1380/2013 is to "ensure that fishing and aquaculture activities are environmentally sustainable in the long-term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies".

The Norwegian Directorate of Fisheries states that its main objective is to "promote profitable economic activity through sustainable and user-oriented management of marine resources and the marine environment". The UK Fisheries Act 2020 sets out 8 objectives for fisheries management in the UK. The first of these is the "sustainability objective", which seeks to ensure that "fish and aquaculture activities are (i) environmentally sustainable in the long term, and (ii) managed so as to achieve economic, social and employment benefits and contribute to the availability of food supplies", and also that "the fishing capacity of fleets is such that fleets are economically viable but do not overexploit marine stocks".

M1.4 Fishery management organisations are legally empowered to take management actions.

In EU member states fisheries management is generally carried out under the national legislation arising from the implementation and/or transposing of EU regulations, in particular but not limited to Regulation (EU) No 1380/2013. In Denmark the key legislation implementing the CFP and guiding fisheries management is the Fisheries Act (No. 978 of 2008, as amended). The primary legal instrument empowering fisheries management in Norway is the Marine Resources Act of 6 June 2008 (no. 37). In the UK the primary fisheries legislation is the Fisheries Act 2020; but also the Marine and Coastal Access Act 2009, and the regulations put in place by the devolved administrations.

M1.5 There is a consultation process through which fishery stakeholders are engaged in decision-making.

The main mechanism for the consultation of stakeholders within the EU is the North Sea Advisory Council (NSAC). The NSAC "is an interdisciplinary stakeholder-led organisation that takes a regional approach to provide the European Commission and EU countries…with recommendations…on the management of North Sea fish stocks on behalf of the fisheries sector, environmental and other stakeholders" (NSAC 2023). Of greatest importance to stakeholder engagement within the sandeel fishery is the Demersal working group, although the Skagerrak & Kattegat and Ecosystem working groups are also relevant.

M1.6 The decision-making process is transparent, with processes and results publicly available.

All of the information used to produce this MarinTrust assessment report was freely available online. The fisheries management decision-making process is primarily guided by the ICES advice, the basis for and outcomes of which are made available via the ICES website.

References

EC (2018). Common Fisheries Policy. https://ec.europa.eu/oceans-and-fisheries/policy/common-fisheries-policy-cfp_en

NSAC (2023). North Sea Advisory Council, "What We Do". https://www.nsrac.org/what-we-do/

Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC. https://www.legislation.gov.uk/eur/2013/1380/contents#

UK Government (2024). Consultation outcome response, sandeel fishing. https://www.gov.uk/government/consultations/consultation-on-spatial-management-measures-for-industrial-sandeel-fishing/outcome/government-response

UK Government (2025). The UK-EU dispute over sandeels. https://commonslibrary.parliament.uk/the-uk-eu-dispute-over-sandeels/

Links	
MarinTrust Standard clause	1.3.1.1, 1.3.1.2

FAO CCRF	7.2, 7.3.1, 7.4.4, 12.3
GSSI	D.1.01, D.4.01, D2.01, D1.07, D1.04,

M2	**Surveillance, Control and Enforcement - Minimum Requirements**		
	M2.1	There is an organisation responsible for monitoring compliance with fishery laws and regulations.	PASS
	M2.2	There is a framework of sanctions which are applied when laws and regulations are discovered to have been broken.	PASS
	M2.3	There is no substantial evidence of widespread non-compliance in the fishery, and no substantial evidence of IUU fishing.	PASS
	M2.4	Compliance with laws and regulations is actively monitored, through a regime which may include at-sea and portside inspections, observer programmes, and VMS.	PASS
		Clause outcome:	PASS

There have been no substantial changes in the management of the fishery relevant to this section since the time of the previous surveillance assessment.

A summary of the outcomes of the initial MT assessment are provided here for convenience. Please refer to the 2023 assessment report for full details.

M2.1 There is an organisation responsible for monitoring compliance with fishery laws and regulations.

Monitoring and enforcement of fisheries compliance in the EU is the responsibility of the individual member states. The agency responsible in Danish waters falls to the Danish Fisheries Agency (FA). The FA operates a small fleet of enforcement vessels and is responsible for regulating, monitoring and inspection of Danish fishing activities. National control and enforcement activities are supported by the European Fisheries Control Agency (EFCA).

M2.2 There is a framework of sanctions which are applied when laws and regulations are discovered to have been broken.

A framework of sanctions is in place as set out in the CFP legislation and transposed into Danish national law. Sanctions potentially include suspension of fishing licence, fines, confiscation of catch and/or equipment, and imprisonment. These are set out in Chapter 23 of the Fisheries Act 2008, as amended.

M2.3 There is no substantial evidence of widespread non-compliance in the fishery, and no substantial evidence of IUU fishing.

The 2023 initial MT assessment identified that the most recent summary report from the FA was published in 2022. A more recent report was published in summer 2023 and covered enforcement activities in 2022 (Fishing Daily 2023). Enforcement activities in 2022 included 2,237 vessel inspections and 1,956 landings inspections. Across the entire Danish fishing industry, 383 violations were recorded, and 1,076 sets of illegal fishing gear were confiscated.

M2.4 Compliance with laws and regulations is actively monitored, through a regime which may include at-sea and portside inspections, observer programmes, and VMS.

Compliance with laws and regulations is monitored through the use of at-sea and portside inspections, e-logbooks, landings certificates, sales notes, VMS, designated ports, and inspections throughout the supply chain. Control efforts are targeted using a risk-based model, which ensures that inspections and other enforcement activity is focussed in areas where low levels of compliance have been detected in the past

References

Danish Fisheries Act, 2008, amended to 2017. https://faolex.fao.org/docs/pdf/den134943original.pdf

EFCA (2023). Mission and Strategy. https://www.efca.europa.eu/en/content/objectives-and-strategy

The Fishing Daily (2023). Danish Fisheries Agency Issues Annual Inspections Report 2022 (5th July 2023). https://thefishingdaily.com/latest-news/danish-fisheries-agency-issues-annual-inspections-report-2022	
Links	
MarinTrust Standard clause	1.3.1.3
FAO CCRF	7.7.2
GSSI	D1.09

CATEGORY A SPECIES

The four clauses in this section apply to Category A species. Clauses A1 - A4 should be completed for **each** Category A species. If there are no Category A species in the fishery under assessment, this section can be deleted. A Category A species must meet the minimum requirements of all four clauses before it can be recommended for approval. The clauses should be completed by providing sufficient evidence to justify awarding each of the requirements a pass or fail rating. The species must achieve a pass rating against all requirements to be awarded a pass overall. **If the species fails any of these clauses it should be re-assessed as a Category B species.**

Species Name		**Sandeel in Sandeel Area 1r**	
A1	**Data Collection - Minimum Requirements**		
	A1.1	Landings data are collected such that the fishery-wide removals of this species are known.	PASS
	A1.2	Sufficient additional information is collected to enable an indication of stock status to be estimated.	PASS
		Clause outcome:	PASS

A1.1 Landings data are collected such that the fishery-wide removals of this species are known.

As in the initial assessment, catch and landings data are collected across the entire sandeel fishery and analysed by Sandeel Area (SA). The table below is an updated version of the one from the initial MT assessment, showing continuing data collection. Discards and bycatch of sandeel continue to be thought negligible, and there is no substantial recreational sandeel fishery. Denmark was found by the initial assessment to be responsible for around 73% of sandeel landings across all SAs (ICES 2018); in 2024 this continued, with Denmark responsible for around 73% of all North Sea sandeel landings (ICES 2025a).

Landings data continue to be collected such that fishery-wide removals of this species are known, and A1.1 is met.

	Area-1r	Area-2r	Area-3r	Area-4	Area-5r	Area-6	Area-7r	All
2011	320241	24310	92450	270	0	489	0	437761
2012	45954	12672	40141	2618	0	214	0	101599
2013	214787	48172	9838	5119	0	72	0	277989
2014	96430	64707	98055	4505	0	65	0	263762
2015	160764	39492	106703	4736	0	198	0	311894
2016	15407	9569	44074	6232	0	123	0	75405
2017	242069	141314	115642	18474	0	0	0	517499
2018	132213	20226	76656	42515	0	0	0	271610
2019	86539	5132	138674	6648	0	96	0	237089
2020	108944	70198	247411	20116	0	97	0	446765
2021	17082	4146	157524	53765	0	93	0	232610
2022	5195	71614	84240	5541	0	38	0	166628
2023	88708	39094	18764	17043	0	77	0	163686
2024	69773	22539	3175	0	0	1	0	95488
arith.mean	268379	95474	143799	28984	5140	1041	873	543689

Sandeel landings by Sandeel Area, 2011 – 2024, plus average for the period 1983-2024. All weights in tonnes (ICES 2025a)

A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.

As previously, a range of additional data are collected to support the stock assessment and fishery management processes. Information sources utilised by the 2025 stock assessment include an annual December dredge survey index; commercial catch rates in April, total international catch and fishing effort; annual natural mortality estimated from the ICES multispecies assessment; maturity-at-age time-variable survey data; and age frequencies from catch sampling (ICES 2025).

Sufficient additional information is collected to enable a reliable estimate of the status of the stock to be generated, and A1.2 is met.

References

ICES (2018). Stock Annex: Sandeel (*Ammodytes marinus*) in the North Sea area 1 (SA1). ICES Stock Annexes. Report. https://doi.org/10.17895/ices.pub.18623159.v1

ICES (2025). Sandeel (*Ammodytes spp.*) in divisions 4.b and 4.c, Sandeel Area 1r (central and southern North Sea, Dogger Bank). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202845.v1

ICES (2025a). ICES (2025). Herring Assessment Working Group for the Area South of 62°N (HAWG). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.28389008.v1

Links

MarinTrust Standard clause	1.3.2.1.1, 1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	7.3.1, 12.3

GSSI	D.4.01, D.5.01, D.6.02, D.3.14

A2	Stock Assessment - Minimum Requirements		
	A2.1	A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.	PASS
	A2.2	The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.	PASS
	A2.3	The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.	PASS
	A2.4	The assessment is subject to internal or external peer review.	PASS
	A2.5	The assessment is made publicly available.	PASS
		Clause outcome:	PASS

[SA1r]

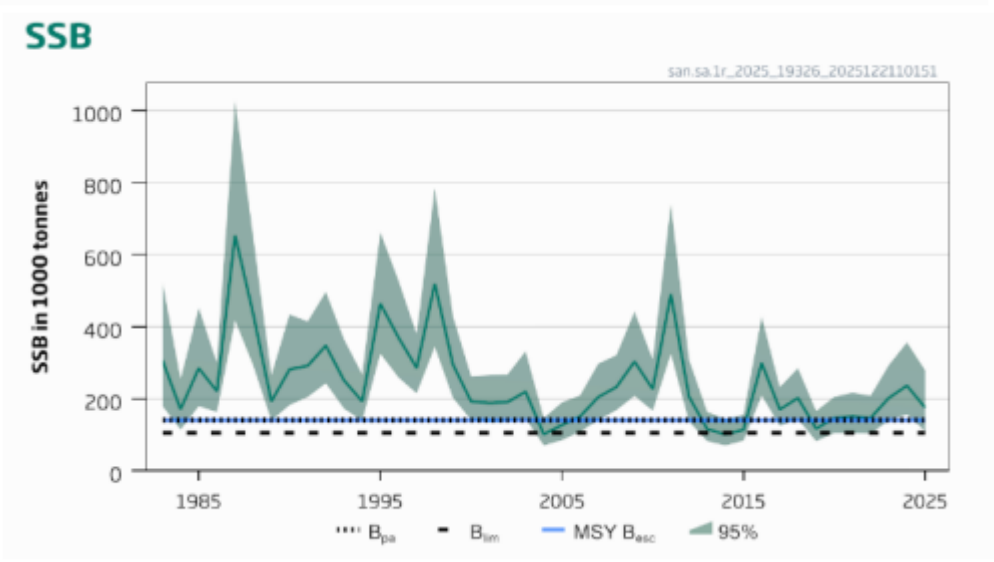
A2.1 A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.

As previously, a stock assessment is conducted by the ICES Herring Assessment Working Group (HAWG) annually. The most recent assessment was conducted in 2025, with the resulting results and catch advice published in February 2025 (ICES 2025). As at the time of the initial assessment, all international catches are included, discards and bycatch are considered negligible, and there is no significant recreational fishery. The assessment takes into account the biological characteristics of the species, as demonstrated by the stock annex which describes the life history and ecological role of sandeel in detail (ICES 2018).

An appropriate annual stock assessment continues to be conducted, and A2.1 is met.

A2.2 The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.

The target and limit reference points identified by the 2023 initial MT assessment for this fishery were updated in 2024 reflect the outcomes of the 2023 benchmark carried out on all four sandeel stocks. The updated target reference points MSY $B_{escapement}$ and B_{pa} set in 2024 remain at 140,824t. The updated limit reference point B_{lim} remains set at 105,809t. The 2025 catch advice indicated a projected SSB value in 2026 of 142,275t, and stated "Spawning-stock size is above MSY $B_{escapement}$, B_{pa}, and B_{lim}" (ICES 2025). The stock assessment produces an estimate of the status of the stock relative to established reference points, and A2.2 is met.



Sandeel in Divisions 4.b-c, SA 1r. SSB relative to current reference points (ICES 2025)

A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.

As previously, the annual ICES catch advice clearly sets out a specific recommendation for the maximum appropriate catch in the following year. The 2025 advice states that "when the maximum sustainable yield (MSY) approach is applied, catches should be no more than 72,997 tonnes in 2025" (ICES 2025). The catch advice also provides alternative catch scenarios to project the likely impacts of other levels of total catch in the coming year, as shown on the table below.

The assessment provides a clear indication of the volume of fishery removals which is appropriate for the current stock status, and A2.3 is met.

Sandeel in Divisions 4.b-c, SA 1r. Annual catch scenarios. All weights in tonnes (ICES 2025)

Basis	Total catch (2025)	F_{total} (2025)	Spawning-stock biomass (SSB) (2026)	% SSB change*	% total allowable catch (TAC) change**	% advice change***
ICES advice basis						
SSB(2026) ≥ MSY $B_{escapement}$ with F_{cap}	72 997	0.33	142 275	−24	−43	−45
Other scenarios						
SSB(2026) = MSY $B_{escapement}$ without F_{cap}	76 547	0.35	140 824	−25	−40	−36
F = 0	0	0	171 808	−8	−100	−100
SSB(2026) = B_{lim}	160 653	0. 96	105 809	−43	25	33
F = F_{2024}	25 628	0.103	161 495	−13	−80	−79

* SSB_{2026} relative to SSB_{2025}.
** Catch scenario for 2025 relative to TAC in 2024 (128 346 t).
*** Advice value 2025 relative to advice value 2024 (132 315 t).

A2.4 The assessment is subject to internal or external peer review.

There have been no substantial changes in the ICES peer review process since the initial MT assessment. ICES advice continues to be provided based on the ten Advice Principles, which include the peer review of all analyses and methods by at least two peer reviewers. Regular benchmarking of recurring advice continues to occur, and as identified in the previous surveillance, the

stock assessments for all four Sandeel Areas have been benchmarked since the initial MT assessment (ICES 2024). The ICES stock assessment remains subject to peer review, and A2.4 is met.

A2.5 The assessment is made publicly available.

As previously, details of the stock assessment process, the data used to carry it out, and the results of the stock assessment are all made publicly available on the ICES website. All documentation used to complete this MT assessment report was sourced online without needing to be requested. A2.5 is met.

References

ICES (2018). Stock Annex: Sandeel (*Ammodytes marinus*) in the North Sea area 1 (SA1). ICES Stock Annexes. Report. https://doi.org/10.17895/ices.pub.18623159.v1

ICES (2024). Benchmark Workshop on Sandeel (*Ammodytes spp*.) (Outputs from 2022 and 2023 meetings) (WKSANDEEL). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.21581151.v2

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.b and 4.c, Sandeel Area 1r (central and southern North Sea, Dogger Bank). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202845.v1

Links

MarinTrust Standard clause	1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	12.3
GSSI	D.5.01, D.6.02, D.3.14

A3	**Harvest Strategy - Minimum Requirements**		
	A3.1	There is a mechanism in place by which total fishing mortality of this species is restricted.	PASS
	A3.2	Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.	PASS
	A3.3	Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).	PASS
		Clause outcome:	PASS

[SA1r]

A3.1 There is a mechanism in place by which total fishing mortality of this species is restricted.

Sandeel in the North Sea are subject to Sandeel-Area-specific Total Annual Catch (TAC) limits. Total international TACs and are set via negotiation between delegations from the fishery management administrations managing the fishery. The EU share of the 2025 sandeel TAC in SA1r has been agreed with the UK to be 96.80% of the total SA1r TAC of 70,807t (UK Gov 2025). The EU share is further subdivided between member states via Council Regulation. At the time of writing this does not appear to have been agreed for the 2025 season.

In the EU, TACs are monitored and enforced by the fishery management administrations of member states, supported by the reporting requirements and landings obligation set out in A1.1.

As previously identified in the initial MT assessment, an important aspect of the sandeel TAC is that up to 10% of the annual quota for a given Sandeel Area can be 'banked' and used the following year, within the same Area. On occasions where one year has a substantially lower quota than the previous (as occurred in 2020/2021) this can lead to substantially higher landings than have been deemed by ICES to be appropriate. As part of the 2023 benchmarking for this stock, ICES evaluated the potential

impacts on this interannual quota transfer, concluding that the practice "marginally increased risk of SSB falling below B_{lim} (0.2% higher risk at F_{cap})" (ICES 2025).

Overall, although the TAC transfer allowance can cause issues in specific years, as in the initial MT assessment this is considered this to be covered by clause A3.2 and A3.3, and therefore that the existence and enforcement of the TAC means A3.1 is met.

A3.2 Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.

The initial assessment for this stock identified an issue where total fishery removals do sometimes exceed the ICES advice, noting that "since 2018, TACs have been set in line with or below the advice; however in 2021 and 2022, landings exceeded the TAC. In 2021, landings were roughly triple the level advised by ICES", and additionally that "these excess landings reflect the "quota flex", with quota holders able to transfer up to 10% of their quota between years. Thus the excess landings do not represent a breach of regulations; however, they have led to catches sometimes being considerably in excess of the ICES recommendation".

The initial assessment noted that the 2022 sandeel benchmarking workshop was intended to reach a conclusion as to whether the practice of transferring quota between years was precautionary; however, as noted in A3.1, ICES do not appear to have reached a conclusion on whether or not it is precautionary. Instead, the conclusion reached is that the practice results in only a small increase to long-term risk that B_{lim} will be breached.

Since the 2023 initial MT assessment, the catch data for 2023 and 2024 have become available. Total catches in SA 1r in both years were well within the maximum catch recommended by ICES (see table below). Although limited progress appears to have been made towards resolving the impacts of the use of "quota flex" on catches relative to advice, catches are currently below the level recommended by ICES and A3.2 is met.

Sandeel in Divisions 4.b-c, SA 1r. ICES advice, TAC, SA 1r catches and total sandeel catches, 2020 – 2025 (ICES 2025)

Year	ICES advice	Catch corresponding to advice	TAC	ICES catch SA 1	ICES catch SA 1r	Total ICES catch (SAs 1r–7r)
2020^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 113 987	113 987		108 944	446 765
2021^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 5464	5351		17082	232 610
2022^	MSY approach: zero catch	0	5000		5195	166 628
2023^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 120 428	116 815		88 707	163 686
2024	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 132 315	128 346		69 773***	95 488***
2025	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 72 997				

* Advice for Subarea 4, excluding the Shetland area.
** Set for EU waters of divisions 2.a and 3.a and Subarea 4.
*** Preliminary.
^ ICES statistical rectangles included in this sandeel area changed with the 2017 assessment and advice.

A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).

There has been no substantial change in the status of this clause since the initial MT assessment. That assessment concluded as follows:

"In 2016, ICES recommended that the sandeel fishery in Sandeel Area 1r should be closed except for a 5,000t sampling quota. This recommendation was not adopted, and the TAC was set at 13,000t. Additionally, TACs are frequently exceeded due to the ability of participants in the fishery to transfer quota between years…meaning that at present it is likely that a similar issue could arise the next time ICES recommend a small or zero TAC. However…the reduction industry is taking steps to prevent this excess catch from occurring in the future and it will not be an issue in the 2023 season. Due to the pro-active measures taken by the industry, the assessor considers the fishery to meet the requirements of this clause; however, future assessments should review progress in tackling the issue, particularly in years where the recommended catch is low".

At this time, the assessor considers questions around the sustainability of the "quota flex" system to remain open, and there is still potential for transfer of TAC between years to lead to catches in excess of the ICES advice in future. However, on the basis of some progress being made (in the form of the ICES benchmarking analysis), of continuing industry commitment to tackling the issue, and of the appropriate level of catch relative to the TAC in 2023 and 2024, A3.3 continues to be met.

References

ICES (2025). Sandeel (*Ammodytes* spp.) in divisions 4.b and 4.c, Sandeel Area 1r (central and southern North Sea, Dogger Bank). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202845.v1

UK Government (2025). Written record of fisheries consultations on 6 March 2025 between the United Kingdom and the European Union about sandeels in 2025. https://assets.publishing.service.gov.uk/media/67d2ec82886e7770c211e097/eu-uk-written-record-fisheries-consultation-sprat-2025.pdf

Standard clause 1.3.2.1.3

Links	
MarinTrust Standard clause	1.3.2.1.3, 1.3.2.1.4
FAO CCRF	7.2.1, 7.22 (e), 7.5.3
GSSI	D3.04, D6.01

A4	**Stock Status – Minimum Requirements**		
	A4.1	The stock is at or above the target reference point, OR IF NOT: The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT: The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.	PASS
		Clause outcome:	PASS

[SA1r]

A4.1 The stock is at or above the target reference point, OR IF NOT:

The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT:

The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.

As detailed in A2.2, the 2025 stock assessment estimated that SSB is currently above the target and limit reference points. SSB in 2026 was projected to be 142,275t, relative to a target reference point (B_{pa} / MSY $B_{escapement}$) of 140,824t (ICES 2025). Therefore, the stock meets the requirements of the first statement, and A4.1 is met.

References

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.b and 4.c, Sandeel Area 1r (central and southern North Sea, Dogger Bank). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202845.v1

Links	
MarinTrust Standard clause	**1.3.2.1.4**
FAO CCRF	**7.2.1, 7.2.2 (e)**
GSSI	**D6 01**

Species Name	**Sandeel in Sandeel Area 2r**

A1	**Data Collection - Minimum Requirements**		
	A1.1	Landings data are collected such that the fishery-wide removals of this species are known.	PASS
	A1.2	Sufficient additional information is collected to enable an indication of stock status to be estimated.	PASS
		Clause outcome:	PASS

A1.1 Landings data are collected such that the fishery-wide removals of this species are known.

As in the initial assessment, catch and landings data are collected across the entire sandeel fishery and analysed by Sandeel Area (SA). The table below is an updated version of the one from the initial MT assessment, showing continuing data collection. Discards and bycatch of sandeel continue to be thought negligible, and there is no substantial recreational sandeel fishery. Denmark was found by the initial assessment to be responsible for around 73% of sandeel landings across all SAs (ICES 2018); in 2024 this continued, with Denmark responsible for around 73% of all North Sea sandeel landings (ICES 2025a).

Landings data continue to be collected such that fishery-wide removals of this species are known, and A1.1 is met.

	Area-1r	Area-2r	Area-3r	Area-4	Area-5r	Area-6	Area-7r	All
2011	320241	24310	92450	270	0	489	0	437761
2012	45954	12672	40141	2618	0	214	0	101599
2013	214787	48172	9838	5119	0	72	0	277989
2014	96430	64707	98055	4505	0	65	0	263762
2015	160764	39492	106703	4736	0	198	0	311894
2016	15407	9569	44074	6232	0	123	0	75405
2017	242069	141314	115642	18474	0	0	0	517499
2018	132213	20226	76656	42515	0	0	0	271610
2019	86539	5132	138674	6648	0	96	0	237089
2020	108944	70198	247411	20116	0	97	0	446765
2021	17082	4146	157524	53765	0	93	0	232610
2022	5195	71614	84240	5541	0	38	0	166628
2023	88708	39094	18764	17043	0	77	0	163686
2024	69773	22539	3175	0	0	1	0	95488
arith.mean	268379	95474	143799	28984	5140	1041	873	543689

Sandeel landings by Sandeel Area, 2011 – 2024, plus average for the period 1983-2024. All weights in tonnes (ICES 2025a)

A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.

As previously, a range of additional data are collected to support the stock assessment and fishery management processes. Information sources utilised by the 2025 stock assessment include an annual December dredge survey index; commercial catch rates in April, total international catch and fishing effort; annual natural mortality estimated from the ICES multispecies assessment; maturity-at-age time-variable survey data; and age frequencies from catch sampling (ICES 2025).

Sufficient additional information is collected to enable a reliable estimate of the status of the stock to be generated, and A1.2 is met.

References

ICES (2020). Stock Annex: Sandeel (*Ammodytes spp*.) in Divisions 4.b and 4.c, and Subdivision 20, Sandeel Area 2r (Skagerrak, central and southern North Sea). ICES Stock Annexes. 40 pp. https://doi.org/10.17895/ices.pub.18623168.v1

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.b-c and Subdivision 20, Sandeel Area 2r (central and southern North sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202848.v1

ICES (2025a). ICES (2025). Herring Assessment Working Group for the Area South of 62°N (HAWG). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.28389008.v1

Links

MarinTrust Standard clause	1.3.2.1.1, 1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	7.3.1, 12.3

GSSI	D.4.01, D.5.01, D.6.02, D.3.14

A2	**Stock Assessment - Minimum Requirements**		
	A2.1	A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.	PASS
	A2.2	The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.	PASS
	A2.3	The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.	PASS
	A2.4	The assessment is subject to internal or external peer review.	PASS
	A2.5	The assessment is made publicly available.	PASS
		Clause outcome:	PASS

[SA2r]

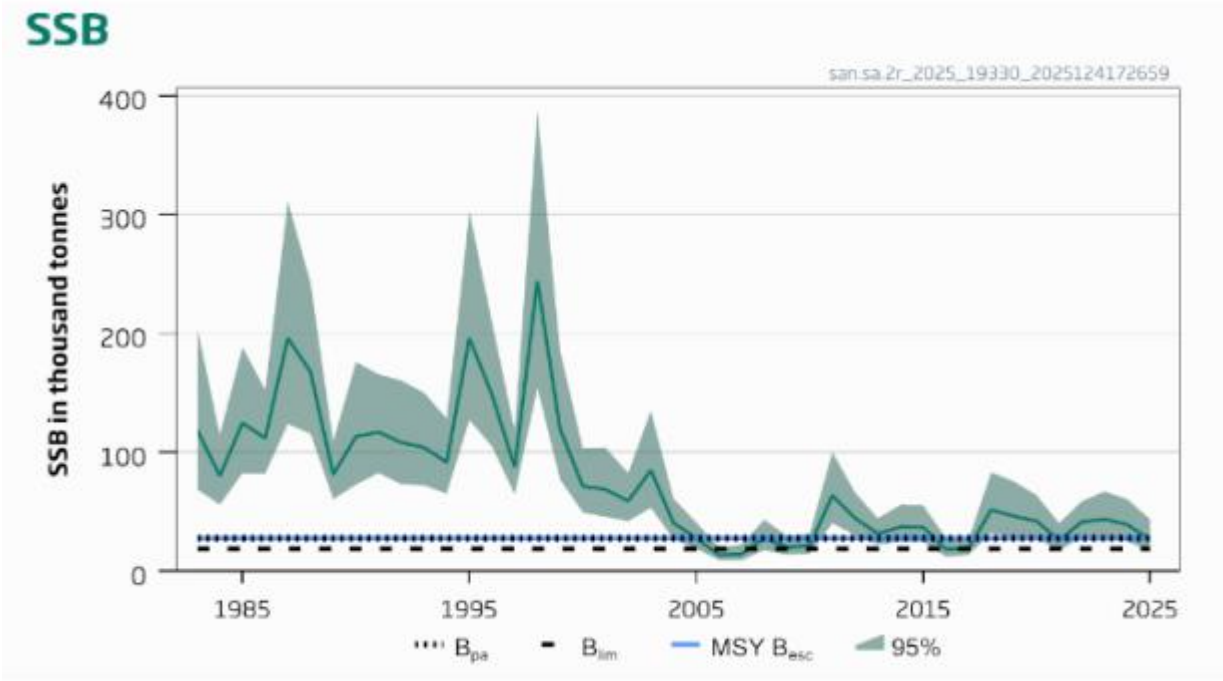
A2.1 A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.

As previously, a stock assessment is conducted by the ICES Herring Assessment Working Group (HAWG) annually. The most recent assessment was conducted in 2025, with the resulting results and catch advice published in February 2025 (ICES 2025). As at the time of the initial assessment, all international catches are included, discards and bycatch are considered negligible, and there is no significant recreational fishery. The assessment takes into account the biological characteristics of the species, as demonstrated by the stock annex which describes the life history and ecological role of sandeel in detail (ICES 2020).

An appropriate annual stock assessment continues to be conducted, and A2.1 is met.

A2.2 The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.

As noted in the 2024 surveillance, the target and limit reference points identified by the 2023 initial MT assessment for this fishery were updated to reflect the outcomes of the 2023 benchmark carried out on all four sandeel stocks. The updated target reference points MSY $B_{escapement}$ and B_{pa} remain set at 27,757t. The updated limit reference point B_{lim} remains set at 18,949t. The 2025 catch advice indicates a projected SSB value in 2026 of 35,437t, and stated "Spawning-stock size is above MSY $B_{escapement}$, B_{pa}, and B_{lim}" (ICES 2025). The stock assessment produces an estimate of the status of the stock relative to established reference points, and A2.2 is met.



Sandeel in Divisions 4.b-c and Subdivision 20, SA 2r. Estimated SSB relative to current reference points (ICES 2025).

A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.

As previously, the annual ICES catch advice clearly sets out a specific recommendation for the maximum appropriate catch in the following year. The 2025 advice states that "when the maximum sustainable yield (MSY) approach is applied, catches in 2025 should be no more than 39,159 tonnes" (ICES 2025). The catch advice also provides alternative catch scenarios to project the likely impacts of other levels of total catch in the coming year, as shown in the table below.

The assessment provides a clear indication of the volume of fishery removals which is appropriate for the current stock status, and A2.3 is met.

Sandeel in Divisions 4.b-c and Subdivision 20, SA 2r. Annual ICES catch scenarios, all weights in tonnes (ICES 2025)

Basis	Total catch (2025)	F_{total} (2025)	Spawing-stock biomass (SSB) (2026)	% SSB change*	% total allowable catch (TAC) change**	% advice change***
ICES advice basis						
SSB(2026) ≥ MSY $B_{escapement}$ with F_{cap}	39 159	0.52	35 437	33	9	9
Other scenarios						
F = 0	0	0	56 498	112	−100	-100
SSB(2026) ≥ MSY $B_{escapement}$ without F_{cap}	54 118	0.80	27 757	4	51	51
B_{lim}	72 061	1.25	18 949	−29	101	101
F = F_{2024}	34 443	0.44	37 908	42	−4	−4

* SSB_{2026} relative to SSB_{2025}.
** Catch scenario for 2025 relative to TAC in 2024 (35 925 t).
*** Advice value 2025 relative to advice value 2024 (35 925 t).

A2.4 The assessment is subject to internal or external peer review.

There have been no substantial changes in the ICES peer review process since the initial MT assessment. ICES advice continues to be provided based on the ten Advice Principles, which include the peer review of all analyses and methods by at least two peer reviewers. Regular benchmarking of recurring advice continues to occur, and the stock assessments for all four Sandeel Areas have been benchmarked since the initial MT assessment in 2023 (ICES 2024). Note that where the outcomes of the benchmark have resulted in changes to the stock assessment process or outcomes (such as revised reference points), this is noted in the relevant section. The ICES stock assessment is subject to peer review, and A2.4 is met.

A2.5 The assessment is made publicly available.

As previously, details of the stock assessment process, the data used to carry it out, and the results of the stock assessment are all made publicly available on the ICES website. All documentation used to complete this MT assessment report was sourced online without needing to be requested. A2.5 is met.

References

ICES (2020). Stock Annex: Sandeel (*Ammodytes spp*.) in Divisions 4.b and 4.c, and Subdivision 20, Sandeel Area 2r (Skagerrak, central and southern North Sea). ICES Stock Annexes. 40 pp. https://doi.org/10.17895/ices.pub.18623168.v1

ICES (2024). Benchmark Workshop on Sandeel (*Ammodytes spp*.) (Outputs from 2022 and 2023 meetings) (WKSANDEEL). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.21581151.v2

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.b-c and Subdivision 20, Sandeel Area 2r (central and southern North sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202848.v1

Links

MarinTrust Standard clause	1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	12.3
GSSI	D.5.01, D.6.02, D.3.14

A3	**Harvest Strategy - Minimum Requirements**		
	A3.1	There is a mechanism in place by which total fishing mortality of this species is restricted.	PASS
	A3.2	Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.	PASS
	A3.3	Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).	PASS
		Clause outcome:	PASS

[SA2r]

A3.1 There is a mechanism in place by which total fishing mortality of this species is restricted.

Sandeel in the North Sea are subject to Sandeel-Area-specific Total Annual Catch (TAC) limits. Total international TACs and are set via negotiation between delegations from the fishery management administrations managing the fishery. The EU share of the 2024 sandeel TAC in SA2r has been agreed with the UK to be 96.8% of the total SA2r TAC of 37,906t (UK Gov 2024). The EU share is further subdivided between member states via Council Regulation. At the time of writing this does not appear to have been agreed for the 2025 season.

In the EU, TACs are monitored and enforced by the fishery management administrations of member states, supported by the reporting requirements and landings obligation set out in A1.1.

As previously identified in the initial MT assessment, an important aspect of the sandeel TAC is that up to 10% of the annual quota for a given Sandeel Area can be 'banked' and used the following year, within the same Area. On occasions where one year has a substantially lower quota than the previous (as occurred in 2017/18) this can lead to substantially higher landings than have been deemed by ICES to be appropriate. As part of the 2023 benchmarking for this stock, ICES evaluated the potential impacts on this interannual quota transfer, concluding that the practice "marginally increased risk of SSB falling below B_{lim} (0.2% higher risk at F_{cap})" (ICES 2025).

Overall, although the TAC transfer allowance can cause issues in specific years, as in the initial MT assessment this is considered this to be covered by clause A3.2 and A3.3, and therefore that the existence and enforcement of the TAC means A3.1 is met.

A3.2 Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.

The initial MT assessment for this stock identified an issue where total fishery removals do sometimes exceed the ICES advice, noting that "Since 2018, TACs have been set in line with or below the advice; however in 2018, 2019 and 2020, landings exceeded the TAC. In 2018, landings were roughly four times the level advised by ICES. This has also been an issue historically, with landings exceeding ICES advice and/or TAC by more than 10% in 2012, 2013, 2014 and 2016. These excess landings reflect the "quota flex", with quota holders able to transfer up to 10% of their quota between years. Thus the excess landings do not represent a breach of regulations; however, they have led to catches sometimes being considerably in excess of the ICES recommendation".

The initial assessment noted that the 2022 sandeel benchmarking workshop was intended to reach a conclusion as to whether the practice of transferring quota between years was precautionary; however, as noted in A3.1, ICES do not appear to have reached a conclusion on whether or not it is precautionary. Instead, the conclusion reached is that the practice results in only a small increase to long-term risk that B_{lim} will be breached.

Since the 2023 initial MT assessment, the catch data for 2023 and 2024 has become available. Total catches in SA 2r in both years were within the maximum catch recommended by ICES (see table below). Although limited progress appears to have been made towards resolving the impacts of the use of "quota flex" on catches relative to advice, catches are currently below the level recommended by ICES and A3.2 is met.

Sandeel in Divisions 4.b-c and Subdivision 20, SA 2r. ICES catch advice, TAC, catches in SA 2/2r, and total sandeel catches, 2020-2025 (ICES 2025)

Year	ICES advice	Catch corresponding to advice	TAC	ICES catch SA 2	ICES catch SA 2r	Total ICES catch (SAs 1r–7r)
2020^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 62 658	62658		70 198	446 765
2021^	MSY approach: zero catch. Monitoring TAC should not exceed 5000 t.	≤ 5000	5000		4146	232 610
2022^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 71 859	71859		71 614	166 628
2023^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 40 997	40997		39 094	163 686
2024	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 35 925	35 925		22 539***	95 488***
2025	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 39 159				

* Advice for Subarea 4, excluding the Shetland area.
** Set for EU waters of divisions 2.a and 3.a and Subarea 4.
*** Preliminary.
^ ICES statistical rectangles included in this sandeel area changed with the 2017 assessment and advice.

A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).

There has been no substantial change in the status of this clause since the initial MT assessment. That assessment concluded as follows:

"In 2018 and 2019, ICES recommended that the sandeel fishery in Sandeel Area 2r should be closed except for a 5,000t sampling quota. Although this advice was implemented by fishery managers, in practice the fishery was not limited to only the sampling quota (due, presumably, to the ability to transfer quota between years), and in 2018 four times this amount was landed. However…the reduction industry is taking steps to prevent this excess catch from occurring in the future and it will not be an issue in the 2023 season. Due to the pro-active measures taken by the industry, the assessor considers the fishery to meet the requirements of this clause; however, future assessments should review progress in tackling the issue, particularly in years where the recommended catch is low."

At this time, the assessor considers questions around the sustainability of the "quota flex" system to remain open, and there is still potential for transfer of TAC between years to lead to catches in excess of the ICES advice in future. However, on the basis of some progress being made (in the form of the ICES benchmarking analysis), of continuing industry commitment to tackling the issue, and of the appropriate level of catch relative to the TAC in 2023, A3.3 continues to be met.

References

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.b-c and Subdivision 20, Sandeel Area 2r (central and southern North sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202848.v1

UK Government (2025). Written record of fisheries consultations on 6 March 2025 between the United Kingdom and the European Union about sandeels in 2025. https://assets.publishing.service.gov.uk/media/67d2ec82886e7770c211e097/eu-uk-written-record-fisheries-consultation-sprat-2025.pdf
Standard clause 1.3.2.1.3

Links	
MarinTrust Standard clause	1.3.2.1.3, 1.3.2.1.4
FAO CCRF	7.2.1, 7.22 (e), 7.5.3
GSSI	D3.04, D6.01

A4	**Stock Status – Minimum Requirements**		
	A4.1	The stock is at or above the target reference point, OR IF NOT: The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT: The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.	PASS
		Clause outcome:	PASS

[SA2r]

A4.1 The stock is at or above the target reference point, OR IF NOT:

The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT:

The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.

As detailed in A2.2, the 2025 stock assessment estimated that SSB is currently above the target and limit reference points. SSB in 2026 was projected to be 35,437t, relative to a target reference point (B_{pa} / MSY $B_{escapement}$) of 27,757t (ICES 2025). Therefore, the stock meets the requirements of the first statement, and A4.1 is met.

References

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.b-c and Subdivision 20, Sandeel Area 2r (central and southern North sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202848.v1

Links	
MarinTrust Standard clause	**1.3.2.1.4**
FAO CCRF	**7.2.1, 7.2.2 (e)**
GSSI	**D6 01**

Species Name	Sandeel in Sandeel Area 3r	
A1	Data Collection - Minimum Requirements	
A1.1	Landings data are collected such that the fishery-wide removals of this species are known.	PASS
A1.2	Sufficient additional information is collected to enable an indication of stock status to be estimated.	PASS
	Clause outcome:	PASS

A1.1 Landings data are collected such that the fishery-wide removals of this species are known.

As in the initial assessment, catch and landings data are collected across the entire sandeel fishery and analysed by Sandeel Area (SA). The table below is an updated version of the one from the initial MT assessment, showing continuing data collection. Discards and bycatch of sandeel continue to be thought negligible, and there is no substantial recreational sandeel fishery. Denmark was found by the initial assessment to be responsible for around 73% of sandeel landings across all SAs (ICES 2018); in 2024 this continued, with Denmark responsible for around 73% of all North Sea sandeel landings (ICES 2025a).

Landings data continue to be collected such that fishery-wide removals of this species are known, and A1.1 is met.

	Area-1r	Area-2r	Area-3r	Area-4	Area-5r	Area-6	Area-7r	All
2011	320241	24310	92450	270	0	489	0	437761
2012	45954	12672	40141	2618	0	214	0	101599
2013	214787	48172	9838	5119	0	72	0	277989
2014	96430	64707	98055	4505	0	65	0	263762
2015	160764	39492	106703	4736	0	198	0	311894
2016	15407	9569	44074	6232	0	123	0	75405
2017	242069	141314	115642	18474	0	0	0	517499
2018	132213	20226	76656	42515	0	0	0	271610
2019	86539	5132	138674	6648	0	96	0	237089
2020	108944	70198	247411	20116	0	97	0	446765
2021	17082	4146	157524	53765	0	93	0	232610
2022	5195	71614	84240	5541	0	38	0	166628
2023	88708	39094	18764	17043	0	77	0	163686
2024	69773	22539	3175	0	0	1	0	95488
arith.mean	268379	95474	143799	28984	5140	1041	873	543689

Sandeel landings by Sandeel Area, 2011 – 2024, plus average for the period 1983-2024. All weights in tonnes (ICES 2025a)

A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.

As previously, a range of additional data are collected to support the stock assessment and fishery management processes. Information sources utilised by the 2025 stock assessment include an annual December dredge survey index; commercial catch rates in April, total international catch and fishing effort; annual natural mortality estimated from the ICES multispecies assessment; maturity-at-age time-variable survey data; and age frequencies from catch sampling (ICES 2025).

Sufficient additional information is collected to enable a reliable estimate of the status of the stock to be generated, and A1.2 is met.

References

ICES (2020). Stock Annex: Sandeel (*Ammodytes spp*.) in Divisions 4.a and 4.b, and Subdivision 20, Sandeel Area 3r (Skagerrak, northern and central North Sea). ICES Stock Annexes. 45 pp. https://doi.org/10.17895/ices.pub.18623180.v1

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b and Subdivision 20, Sandeel Area 3r (northern and central North Sea, Skagerrak). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202851.v1

ICES (2025a). ICES (2025). Herring Assessment Working Group for the Area South of 62°N (HAWG). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.28389008.v1

Links

MarinTrust Standard clause	1.3.2.1.1, 1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	7.3.1, 12.3
GSSI	D.4.01, D.5.01, D.6.02, D.3.14

A2	**Stock Assessment - Minimum Requirements**		
	A2.1	A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.	PASS
	A2.2	The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.	PASS
	A2.3	The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.	PASS
	A2.4	The assessment is subject to internal or external peer review.	PASS
	A2.5	The assessment is made publicly available.	PASS
		Clause outcome:	PASS

[SA3r]

A2.1 A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.

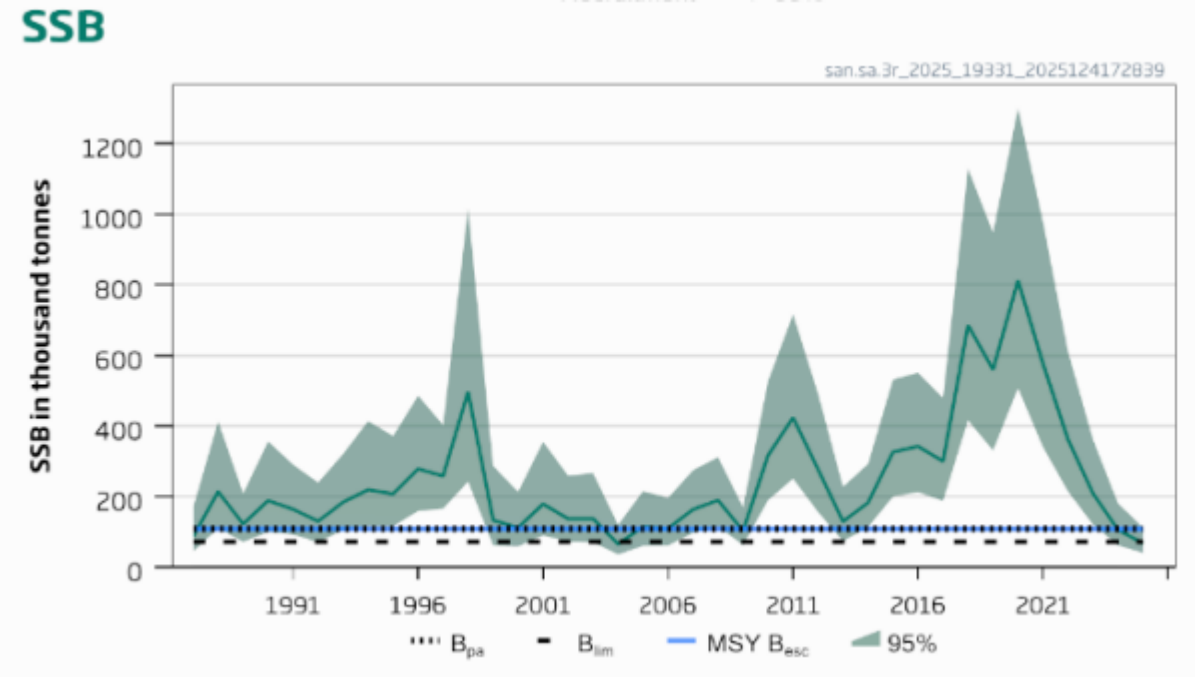
As previously, a stock assessment is conducted by the ICES Herring Assessment Working Group (HAWG) annually. The most recent assessment was conducted in 2025, with the resulting results and catch advice published in February 2025 (ICES 2025). As at the time of the initial assessment, all international catches are included, discards and bycatch are considered negligible, and there is no significant recreational fishery. The assessment takes into account the biological characteristics of the species, as demonstrated by the stock annex which describes the life history and ecological role of sandeel in detail (ICES 2020).

Sandeel in the part of SA3r which falls within the Norwegian EEZ is also subjected to annual stock assessment by the Institute of Marine Research (IMR). This assessment utilises five management areas and produces catch recommendations based largely on the outputs of acoustic cruises and catch statistics (IMR 2025).

An appropriate annual stock assessment continues to be conducted, and A2.1 is met.

A2.2 The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.

The target and limit reference points identified by the 2023 initial MT assessment for this fishery were updated to reflect the outcomes of the 2023 benchmark carried out on all four sandeel stocks. The updated target reference points MSY $B_{escapement}$ and B_{pa} remain set at 108,978t. The updated limit reference point B_{lim} remains set at 72,713t. The 2025 catch advice indicated a projected SSB value in 2026 of 68,924t, and stated "Spawning-stock size in 2025 is below B_{PA}, B_{lim} and MSY $B_{escapement}$" (ICES 2025). The stock assessment produces an estimate of the status of the stock relative to established reference points, and A2.2 is met.



Sandeel in Divisions 4.a-b and Subdivision 20, SA 3r. Estimated SSB relative to current reference points (ICES 2025)

A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.

As previously, the annual ICES catch advice clearly sets out a specific recommendation for the maximum appropriate catch in the following year. The 2024 advice states that "when the maximum sustainable yield (MSY) approach is applied, there should be zero catch in 2025" (ICES 2025). The catch advice also provides alternative catch scenarios to project the likely impacts of other levels of total catch in the coming year, as shown on the table below.

The IMR advice for the overlapping Norwegian management area also recommends zero catch in 2025 (IMR 2025, 2025a)

The assessment provides a clear indication of the volume of fishery removals which is appropriate for the current stock status, and A2.3 is met.

Sandeel in Divisions 4.a-b and Subdivision 20, SA 3r. Annual ICES catch scenarios, all weights in tonnes (ICES 2025)

Basis	Total catch (2025)	F_{total} (2025)	Spawning-stock biomass (SSB; 2026)	% SSB change*	% total allowable catch (TAC) change**	% advice change***
ICES advice basis						
$SSB_{2026} \geq MSY\ B_{escapement}$	0	0	68 924	1	−100	-
Other scenarios						
F = 0	0	0	68 924	1	−100	-
SSB(2026) = B_{lim}^						
F = F_{2024}	2533	0.031	67 595	−1	−89	-

* SSB_{2026} relative to SSB_{2025}.
** Catch scenario for 2025 relative to the TAC in 2024 (24 000 t = the sum of the Norwegian [19 000 t], EU–UK TAC [5000 t]).
*** Advice value 2025 relative to advice value 2024 (0 t).
^ B_{lim} cannot be achieved in 2026, even with zero catch.

A2.4 The assessment is subject to internal or external peer review.

There have been no substantial changes in the ICES peer review process since the initial MT assessment. ICES advice continues to be provided based on the ten Advice Principles, which include the peer review of all analyses and methods by at least two peer reviewers. Regular benchmarking of recurring advice continues to occur, and the stock assessments for all four Sandeel Areas have been benchmarked since the initial MT assessment in 2023 (ICES 2024). Note that where the outcomes of the benchmark have resulted in changes to the stock assessment process or outcomes (such as revised reference points), this is noted in the relevant section. The ICES stock assessment is subject to peer review, and A2.4 is met.

A2.5 The assessment is made publicly available.

As previously, details of the stock assessment process, the data used to carry it out, and the results of the stock assessment are all made publicly available on the ICES website. All documentation used to complete this MT assessment report was sourced online without needing to be requested. A2.5 is met.

References

ICES (2020). Stock Annex: Sandeel (*Ammodytes spp*.) in Divisions 4.a and 4.b, and Subdivision 20, Sandeel Area 3r (Skagerrak, northern and central North Sea). ICES Stock Annexes. 45 pp. https://doi.org/10.17895/ices.pub.18623180.v1

ICES (2024). Benchmark Workshop on Sandeel (*Ammodytes spp*.) (Outputs from 2022 and 2023 meetings) (WKSANDEEL). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.21581151.v2

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b and Subdivision 20, Sandeel Area 3r (northern and central North Sea, Skagerrak). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202851.v1

IMR (2025). Preliminary advice for sandeel fishing in the Norwegian economic zone in 2025. https://www.hi.no/hi/nettrapporter/rapport-fra-havforskningen-2025-9

IMR (2025a). Advice for sandeel fishing in the Norwegian economic zone in 2025. https://www.hi.no/hi/nettrapporter/rapport-fra-havforskningen-2025-31

Links

MarinTrust Standard clause	1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	12.3
GSSI	D.5.01, D.6.02, D.3.14

A3	Harvest Strategy - Minimum Requirements		
	A3.1	There is a mechanism in place by which total fishing mortality of this species is restricted.	PASS
	A3.2	Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.	PASS
	A3.3	Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).	PASS
		Clause outcome:	PASS

[SA3r]

A3.1 There is a mechanism in place by which total fishing mortality of this species is restricted.

Sandeel in the North Sea are subject to Sandeel-Area-specific Total Annual Catch (TAC) limits. Total international TACs and are set via negotiation between delegations from the fishery management administrations managing the fishery. The EU and UK have agreed that, in line with the ICES advice that there be no monitoring TAC in 2025, the quota for SA3r in 2025 will be 0t (UK Government 2025). The IMR has also recommended zero quota in the Norwegian fishery (The Fishing Daily, 2025)

In the EU, TACs are monitored and enforced by the fishery management administrations of member states, supported by the reporting requirements and landings obligation set out in A1.1.

As previously identified in the initial MT assessment, an important aspect of the sandeel TAC is that up to 10% of the annual quota for a given Sandeel Area can be 'banked' and used the following year, within the same Area. On occasions where one year has a substantially lower quota than the previous this can lead to substantially higher landings than have been deemed by ICES to be appropriate. However, this is less of an issue in SA3r than the other SAs because the EU component of the fishery is relatively small compared to the Norwegian catch, which is not transferable between years.

Overall, although the TAC transfer allowance can cause issues in specific years, as in the initial MT assessment this is considered this to be covered by clause A3.2 and A3.3, and therefore that the existence and enforcement of the EU, UK and Norwegian TACs means A3.1 is met.

A3.2 Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.

As noted in the initial MT assessment of this stock, total fishery removals of this species do sometimes exceed the ICES advice. However, as there are two organisations (ICES and IMR) providing catch advice on separate bases the situation is more complex than in the other SAs. As of the 2023 initial assessment, total international landings exceeded the ICES advice in 2017, 2019, and 2020; in 2017 and 2020 the advice was exceeded by more than 10%. However, the Norwegian component of the quota is set in line with advice provided by the IMR, based on a preliminary, conservative quota updated mid-season as a result of the annual in-year sandeel research cruise. The initial assessment also noted that it can therefore be argued that a more appropriate recommendation against which to compare the total catch is the Norwegian advice. By this standard the catch exceeded the recommendation in 2018, 2019 and 2021. In none of these years was the advice exceeded by more than 10%, and at all times up to and including 2024 the sandeel biomass in SA3r was estimated to be above the target reference point (ICES 2025).

Since the 2023 initial MT assessment, the catch data for 2023 and 2024 have become available. Total catches in SA 3r in 2023 were 18,955t, well within the maximum catch recommended by ICES (30,570t). For the 2024 fishing season, ICES recommended a monitoring TAC of 5,000t only, which was implemented. Norway applied a TAC of 19,000t, based on IMR advice. Total catches in 2024 were 3,175t, within the ICES monitoring TAC recommendation. Therefore the ICES advice was not exceeded in either year.

Sandeel in Divisions 4.a-b and Subdivision 20, SA 3r. ICES advice, TACs, total catches in SA 3/3r, and total sandeel catches, 2020 – 2025 (ICES 2025)

Year	ICES advice	Catch corresponding to advice	EU & UK zone TAC	Norwegian zone TAC	ICES catch SA 3	ICES catch SA 3r	Total ICES catch (SAs 1r–7r)
2020^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 155072	12406	250000		247411	446765
2021^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 161335	12907	145000		157524	232610
2022^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 85559	6845	95000		84240	166628
2023^	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 30570	2446	60000		18764	163686
2024^	MSY approach: zero catch	0	5000	19 000		3175^^	95488^^
2025	MSY approach: zero catch	0					

* Advice for Subarea 4, excluding the Shetland area.
** Set for EU waters of divisions 2.a and 3.a, and Subarea 4.
*** TAC for EU fisheries set at 10 000 t; seasonal effort limitations set for Norwegian fisheries.
^ ICES statistical rectangles included in this sandeel area have changed with the 2017 assessment and advice.
^^ Preliminary.

A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).

As of 2024, neither ICES nor the IMR had recommended the fishery be entirely closed in recent years, with the exception of the 2024 ICES advice to limit the fishery to a 5,000t monitoring quota. For the 2025 season, both ICES (ICES 2025) and the IMR (The Fishing Daily 2025) have recommended zero quota due to low biomass. The UK and EU have implemented this recommendation (UK Government 2025). Conclusive evidence could not be found, but reporting implies that the Norwegian fishery will also remain closed at least until an updated IMR recommendation in mid-May, based on an April-May trawl and acoustic survey (The Fishing Daily 2025).

The quota transfer rule – allowing 10% of EU quota to be carried over from one season to next – has the potential to cause the same issues as have been identified in the other sandeel management areas. Quota flex does not appear to have caused issues in this area in 2024, with total catches smaller than the 5,000t monitoring TAC. It remains to be seen whether it will result in catches in this area in 2025.

At the time of writing, managers have implemented the ICES and IMR recommendations to close the fishery in 2025. The stock is considered to Pass clause A3.3, on the assumption that no catch will be taken in this area in 2025.

References

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b and Subdivision 20, Sandeel Area 3r (northern and central North Sea, Skagerrak). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202851.v1

The Fishing Daily (2025). Norway recommends zero sandeel quota for 2025 amid stock crisis. https://thefishingdaily.com/latest-news/norway-recommends-zero-sandeel-quota-for-2025-amid-stock-crisis/

UK Government (2025). Written record of fisheries consultations on 6 March 2025 between the United Kingdom and the European Union about sandeels in 2025. https://assets.publishing.service.gov.uk/media/67d2ec82886e7770c211e097/eu-uk-written-record-fisheries-consultation-sprat-2025.pdf
Standard clause 1.3.2.1.3

Links	
MarinTrust Standard clause	1.3.2.1.3, 1.3.2.1.4
FAO CCRF	7.2.1, 7.22 (e), 7.5.3
GSSI	D3.04, D6.01

A4	**Stock Status – Minimum Requirements**		
	A4.1	The stock is at or above the target reference point, OR IF NOT: The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT: The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.	PASS
		Clause outcome:	PASS

[SA3r]

A4.1 The stock is at or above the target reference point, OR IF NOT:

The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT:

The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.

As detailed in A2.2, the 2025 stock assessment estimated that SSB is currently below the target and limit reference points. SSB in 2026 was projected to be 68,924t even with no fishing, relative to a limit reference point (B_{lim}) of 72,713t (ICES 2025). Therefore, the stock does not meet the requirements of the first two statements.

At the time of writing, fishery removals are prohibited, therefore the stock meets the requirements of the final statement. A4.1 is met, on the assumption that no sandeel will be caught in this SA in 2025.

References

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b and Subdivision 20, Sandeel Area 3r (northern and central North Sea, Skagerrak). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202851.v1

Links	
MarinTrust Standard clause	**1.3.2.1.4**
FAO CCRF	**7.2.1, 7.2.2 (e)**
GSSI	**D6 01**

Species Name	Sandeel in Sandeel Area 4	
A1	Data Collection - Minimum Requirements	
A1.1	Landings data are collected such that the fishery-wide removals of this species are known.	PASS
A1.2	Sufficient additional information is collected to enable an indication of stock status to be estimated.	PASS
	Clause outcome:	PASS

A1.1 Landings data are collected such that the fishery-wide removals of this species are known.

As in the initial assessment, catch and landings data are collected across the entire sandeel fishery and analysed by Sandeel Area (SA). The table below is an updated version of the one from the initial MT assessment, showing continuing data collection. Discards and bycatch of sandeel continue to be thought negligible, and there is no substantial recreational sandeel fishery. Denmark was found by the initial assessment to be responsible for around 73% of sandeel landings across all SAs (ICES 2018); in 2024 this continued, with Denmark responsible for around 73% of all North Sea sandeel landings (ICES 2025a).

Landings data continue to be collected such that fishery-wide removals of this species are known, and A1.1 is met.

	Area-1r	Area-2r	Area-3r	Area-4	Area-5r	Area-6	Area-7r	All
2011	320241	24310	92450	270	0	489	0	437761
2012	45954	12672	40141	2618	0	214	0	101599
2013	214787	48172	9838	5119	0	72	0	277989
2014	96430	64707	98055	4505	0	65	0	263762
2015	160764	39492	106703	4736	0	198	0	311894
2016	15407	9569	44074	6232	0	123	0	75405
2017	242069	141314	115642	18474	0	0	0	517499
2018	132213	20226	76656	42515	0	0	0	271610
2019	86539	5132	138674	6648	0	96	0	237089
2020	108944	70198	247411	20116	0	97	0	446765
2021	17082	4146	157524	53765	0	93	0	232610
2022	5195	71614	84240	5541	0	38	0	166628
2023	88708	39094	18764	17043	0	77	0	163686
2024	69773	22539	3175	0	0	1	0	95488
arith.mean	268379	95474	143799	28984	5140	1041	873	543689

Sandeel landings by Sandeel Area, 2011 – 2024, plus average for the period 1983-2024. All weights in tonnes (ICES 2025a)

A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.

As previously, a range of additional data are collected to support the stock assessment and fishery management processes. Information sources utilised by the 2025 stock assessment include an annual December dredge survey index; commercial catch rates in April, total international catch and fishing effort; annual natural mortality estimated from the ICES multispecies assessment; maturity-at-age time-variable survey data; and age frequencies from catch sampling (ICES 2025).

Sufficient additional information is collected to enable a reliable estimate of the status of the stock to be generated, and A1.2 is met.

References

ICES (2016). Stock Annex: Sandeel (*Ammodytes spp*.) in divisions 4.a and 4.b, Sandeel Area 4 (northern and central North Sea). ICES Stock Annexes. 36 pp. https://doi.org/10.17895/ices.pub.18623186.v1

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b, Sandeel Area 4 (northern and central North Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202854.v1

ICES (2025a). ICES (2025). Herring Assessment Working Group for the Area South of 62°N (HAWG). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.28389008.v1

Links

MarinTrust Standard clause	1.3.2.1.1, 1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	7.3.1, 12.3
GSSI	D.4.01, D.5.01, D.6.02, D.3.14

A2	**Stock Assessment - Minimum Requirements**		
	A2.1	A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.	PASS
	A2.2	The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.	PASS
	A2.3	The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.	PASS
	A2.4	The assessment is subject to internal or external peer review.	PASS
	A2.5	The assessment is made publicly available.	PASS
		Clause outcome:	PASS

[SA4]

A2.1 A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock), and considers all fishery removals and the biological characteristics of the species.

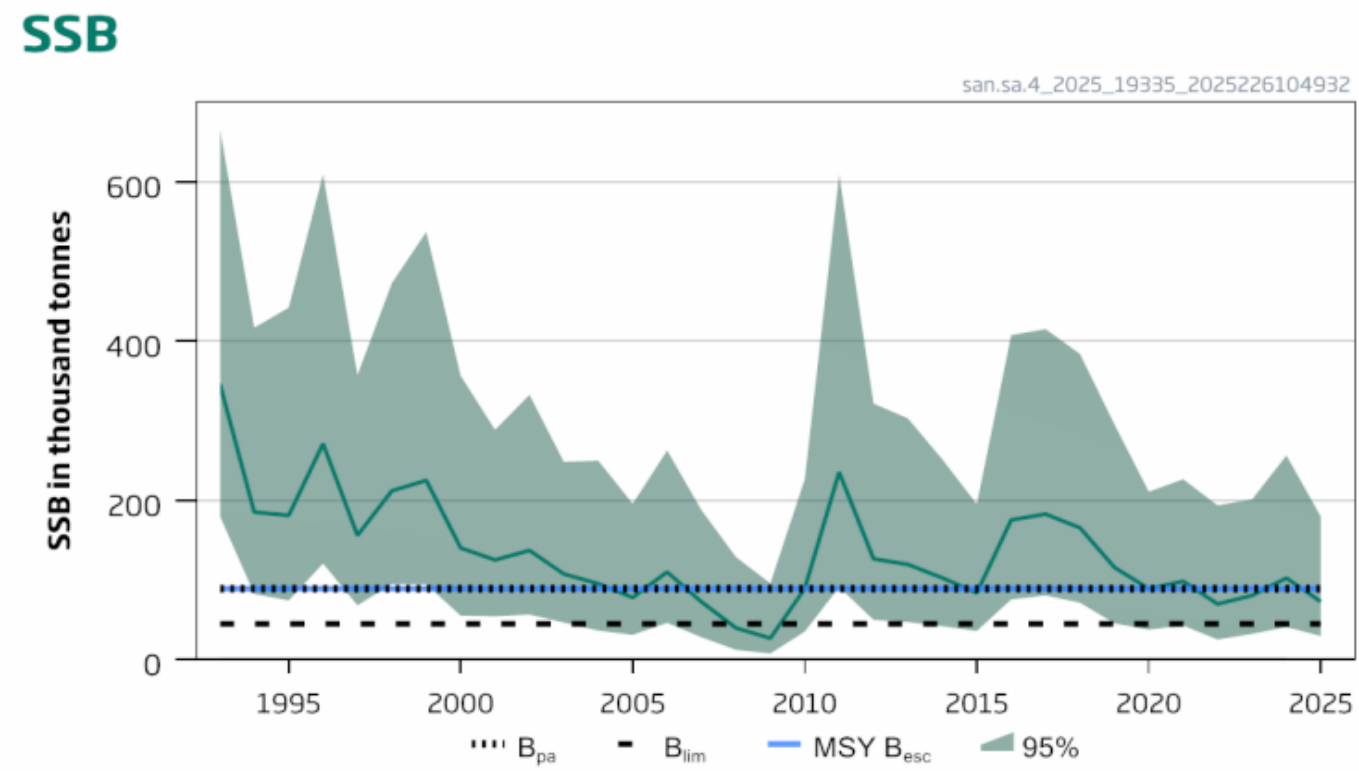
As previously, a stock assessment is conducted by the ICES Herring Assessment Working Group (HAWG) annually. The most recent assessment was conducted in 2025, with the resulting results and catch advice published in February 2025 (ICES 2025). As at the time of the initial assessment, all international catches are included, discards and bycatch are considered negligible, and there is no significant recreational fishery. The assessment takes into account the biological characteristics of the species, as demonstrated by the stock annex which describes the life history and ecological role of sandeel in detail (ICES 2016).

An appropriate annual stock assessment continues to be conducted, and A2.1 is met.

A2.2 The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.

The target and limit reference points identified by the 2023 initial MT assessment for this fishery were updated to reflect the outcomes of the 2023 benchmark carried out on all four sandeel stocks. The updated target reference points MSY $B_{escapement}$ and B_{pa} remain set at 88,995t. The updated limit reference point B_{lim} remains set at 44,716t. The 2025 catch advice indicates a

projected SSB value in 2026 of 57,507, and stated "Spawning-stock size is below MSY $B_{escapement}$ and B_{pa}, and above B_{lim}" (ICES 2025). The stock assessment produces an estimate of the status of the stock relative to established reference points, and A2.2 is met.



Sandeel in Divisions 4.a-b, SA 4. Estimated SSB relative to current reference points (ICES 2025)

A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.

As previously, the annual ICES catch advice clearly sets out a specific recommendation for the maximum appropriate catch in the following year. The 2025 advice states that "when the maximum sustainable yield (MSY) approach is applied, there should be zero catch in 2025" (ICES 2025). The catch advice also provides alternative catch scenarios to project the likely impacts of other levels of total catch in the coming year, as shown on the table below.

The assessment provides a clear indication of the volume of fishery removals which is appropriate for the current stock status, and A2.3 is met.

Sandeel in Divisions 4.a-b, SA 4. Annual ICES catch scenarios, all weights in tonnes (ICES 2025)

Basis	Total catch (2025)	F_{total} (2025)	Spawning-stock biomass (SSB; 2026)	% SSB change*	% total allowable catch (TAC) change**	% advice change***
ICES advice basis						
SSB(2026) ≥ MSY $B_{escapement}$	0	0	57 507	−21	0	0
Other scenarios						
F = 0	0	0	57 507	−21	0	0
SSB(2026) = B_{lim}	20 380	0.23	44 716	−39	-	-
F = F_{2024}	0	0	57 507	−21	0	0
Monitoring TAC	5000	0.051	54 333	−25	-	-

* SSB_{2026} relative to SSB_{2025}.
** Catch scenario for 2025 relative to the TAC in 2024 (0 t).
*** Advice value 2025 relative to advice value 2024 (0 t).

A2.4 The assessment is subject to internal or external peer review.

There have been no substantial changes in the ICES peer review process since the initial MT assessment. ICES advice continues to be provided based on the ten Advice Principles, which include the peer review of all analyses and methods by at least two peer reviewers. Regular benchmarking of recurring advice continues to occur, and the stock assessments for all four Sandeel Areas have been benchmarked since the initial MT assessment in 2023 (ICES 2024). Note that where the outcomes of the benchmark have resulted in changes to the stock assessment process or outcomes (such as revised reference points), this is noted in the relevant section. The ICES stock assessment is subject to peer review, and A2.4 is met.

A2.5 The assessment is made publicly available.

As previously, details of the stock assessment process, the data used to carry it out, and the results of the stock assessment are all made publicly available on the ICES website. All documentation used to complete this MT assessment report was sourced online without needing to be requested. A2.5 is met.

References

ICES (2016). Stock Annex: Sandeel (*Ammodytes spp*.) in divisions 4.a and 4.b, Sandeel Area 4 (northern and central North Sea). ICES Stock Annexes. 36 pp. https://doi.org/10.17895/ices.pub.18623186.v1

ICES (2024). Benchmark Workshop on Sandeel (*Ammodytes spp*.) (Outputs from 2022 and 2023 meetings) (WKSANDEEL). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.21581151.v2

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b, Sandeel Area 4 (northern and central North Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202854.v1

Links

MarinTrust Standard clause	1.3.2.1.2, 1.3.2.1.4, 1.3.1.2
FAO CCRF	12.3
GSSI	D.5.01, D.6.02, D.3.14

A3	**Harvest Strategy - Minimum Requirements**	
A3.1	There is a mechanism in place by which total fishing mortality of this species is restricted.	PASS
A3.2	Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.	PASS

	A3.3	Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).	PASS
		Clause outcome:	PASS

[SA4]

A3.1 There is a mechanism in place by which total fishing mortality of this species is restricted.

Sandeel in the North Sea are subject to Sandeel-Area-specific Total Annual Catch (TAC) limits. Total international TACs and are set via negotiation between delegations from the fishery management administrations managing the fishery. The EU and UK have implemented the ICES recommendation that catches of sandeel in SA4 should be zero in 2025 (UK Gov 2025).

In the EU, TACs are monitored and enforced by the fishery management administrations of member states, supported by the reporting requirements and landings obligation set out in A1.1.

As previously identified in the initial MT assessment, an important aspect of the sandeel TAC is that up to 10% of the annual quota for a given Sandeel Area can be 'banked' and used the following year, within the same Area. On occasions where one year has a substantially lower quota than the previous this can lead to substantially higher landings than have been deemed by ICES to be appropriate; however, catch records appear to indicate this has been less of an issue in SA4 than the other SAs.

Overall, although the TAC transfer allowance has the potential to cause issues in specific years, as in the initial MT assessment this is considered this to be covered by clause A3.2 and A3.3, and therefore that the existence and enforcement of the TAC means A3.1 is met.

A3.2 Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.

The initial assessment for this stock identified an issue where total fishery removals do sometimes exceed the ICES advice, noting that "Total fishery removals of this species do sometimes exceed the ICES advice. Since 2018, TACs have been set in line with or below the advice; however in 2019, landings exceeded the TAC by substantially more than 10% (6,666t against a TAC of 5,000t) and in 2022 landings are preliminarily estimated to have exceeded the TAC by almost exactly 10% [this has since been confirmed]. Excess catch has been less of an issue historically in SA4 than in other SAs; prior to 2018, the advice was only exceeded in 2016, and then by less than 10%".

The initial assessment noted that the 2022 sandeel benchmarking workshop was intended to reach a conclusion as to whether the practice of transferring quota between years was precautionary; however, as noted in A3.1, ICES do not appear to have reached a conclusion on whether or not it is precautionary. Instead, the conclusion reached is that the practice results in only a small increase to long-term risk that B_{lim} will be breached.

Since the 2023 initial MT assessment, the catch data for 2023 and 2024 have become available. Total catches in SA 4 were within the maximum catch recommended by ICES in both years (see table below). Although limited progress appears to have been made towards resolving the impacts of the use of "quota flex" on catches relative to advice, catches are currently in line with the level recommended by ICES and A3.2 is met.

Sandeel in Divisions 4.a-b, SA 4. ICES recommendation, TAC, catch in SA 4, and total sandeel catch, 2020 – 2025 (ICES 2025)

Year	ICES advice	Catch corresponding to advice	TAC	ICES catch SA 4	Total ICES catch (SAs 1r–7r)
2020	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 39611	39611	20116	446765
2021	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 77512	68989	53765	232610
2022	MSY approach: zero catch	0	5000	5541	166628
2023	MSY approach: allow for sufficient stock (MSY $B_{escapement}$) to remain for successful recruitment	≤ 35020	33969	17 043	163 686
2024	MSY approach: zero catch	0	0	0***	95 488***
2025	MSY approach: zero catch	0			

* Advice for Subarea 4, excluding the Shetland area.
** Set for EU waters of divisions 2.a and 3.a, and Subarea 4.
*** Preliminary.

A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).

There has been no substantial change in the status of this clause since the initial MT assessment. The 2023 MT assessment concluded "ICES has recommended that a quota of 5,000t specifically for research purposes should be set in 2019 and 2022. In both years the TAC was set in line with this advice, but excess catch was taken. Despite the issues with quota transfer potentially preventing the ability of managers to prohibit catch, this does not appear to occur in practice in SA4 to the same extent as other SAs".

The quota transfer rule – allowing 10% of EU quota to be carried over from one season to next – continues to have the potential to cause the same issues as have been identified in the other sandeel management areas. As the TAC has been set to zero for the 2024 and 2025 seasons, and the quota flex did not appear to cause any issues in 2024 with catch remaining at 0t.

As at the time of the initial assessment, there is currently no evidence that the fishery in this Sandeel Area would not be closed if recommended, and managers have implemented the ICES recommendation to close the fishery in 2024 and 2025. The stock is considered to Pass clause A3.3.

References

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b, Sandeel Area 4 (northern and central North Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202854.v1

UK Government (2025). Written record of fisheries consultations on 6 March 2025 between the United Kingdom and the European Union about sandeels in 2025. https://assets.publishing.service.gov.uk/media/67d2ec82886e7770c211e097/eu-uk-written-record-fisheries-consultation-sprat-2025.pdf

Standard clause 1.3.2.1.3

Links	
MarinTrust Standard clause	1.3.2.1.3, 1.3.2.1.4
FAO CCRF	7.2.1, 7.22 (e), 7.5.3
GSSI	D3.04, D6.01

A4	Stock Status – Minimum Requirements		
	A4.1	The stock is at or above the target reference point, OR IF NOT: The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT: The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.	PASS
		Clause outcome:	PASS

[SA4]

A4.1 The stock is at or above the target reference point, OR IF NOT:

The stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure OR IF NOT:

The stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.

As detailed in A2.2, the 2025 stock assessment estimated that SSB is currently below the target reference point level, but above the limit reference point. SSB in 2026 is projected to be 57,507t, relative to a target reference point (B_{pa} / MSY $B_{escapement}$) of 88,995t and a limit reference point (B_{lim}) of 44,716t (ICES 2024). The first statement of this clause is not met, but the stock is above the limit reference point. Additionally, ICES has advised the closure of the fishery, and this closure has been adopted by the EU and UK with a 2025 sandeel TAC of 0t (UK Gov 2024). This means that the stock meets the requirements of the second statement, and A4.1 is met.

References

ICES (2025). Sandeel (*Ammodytes spp*.) in divisions 4.a–b, Sandeel Area 4 (northern and central North Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202854.v1

UK Government (2025). Written record of fisheries consultations on 6 March 2025 between the United Kingdom and the European Union about sandeels in 2025. https://assets.publishing.service.gov.uk/media/67d2ec82886e7770c211e097/eu-uk-written-record-fisheries-consultation-sprat-2025.pdf

Links	
MarinTrust Standard clause	**1.3.2.1.4**
FAO CCRF	**7.2.1, 7.2.2 (e)**
GSSI	**D6 01**

CATEGORY C SPECIES

In a whole fish assessment, Category C species are those which make up less than 5% of landings, but which are subject to a species-specific management regime. In most cases this will be because they are a commercial target in a fishery other than the one under assessment.

Clause C1 should be completed for **each** Category C species. If there are no Category C species in the fishery under assessment, this section can be deleted. Where a species fails this Clause, it may be assessed as a Category D species instead, EXCEPT if there is evidence that it is currently below the limit reference point.

Species Name		**Herring, *Clupea harengus*, in ICES Subarea 4 & Divisions 3a and 7d (North Sea, Skagerrak and Kattegat, eastern English Channel)**	
C1	**Category C Stock Status - Minimum Requirements**		
	C1.1	Fishery removals of the species in the fishery under assessment are included in the stock assessment process, OR are considered by scientific authorities to be negligible.	PASS
	C1.2	The species is considered, in its most recent stock assessment, to have a biomass above the limit reference point (or proxy), OR removals by the fishery under assessment are considered by scientific authorities to be negligible.	PASS
		Clause outcome:	PASS

C1.1 Fishery removals of the species in the fishery under assessment are included in the stock assessment process, OR are considered by scientific authorities to be negligible.

As previously, an annual stock assessment continues to be conducted by the ICES Herring Assessment Working Group (HAWG). The results of the assessment are used to produce catch recommendations for the stock. All fishery removals for the stock are incorporated into the stock assessment, an effort assisted by mandatory catch reporting and landings obligation rules in place in the EU. Total landings of herring in Subarea 4 and Divisions 3a and 7d in 2023 were estimated to be 419,774t (ICES 2024). This total includes herring bycatch from the sandeel fisheries in the North Sea.

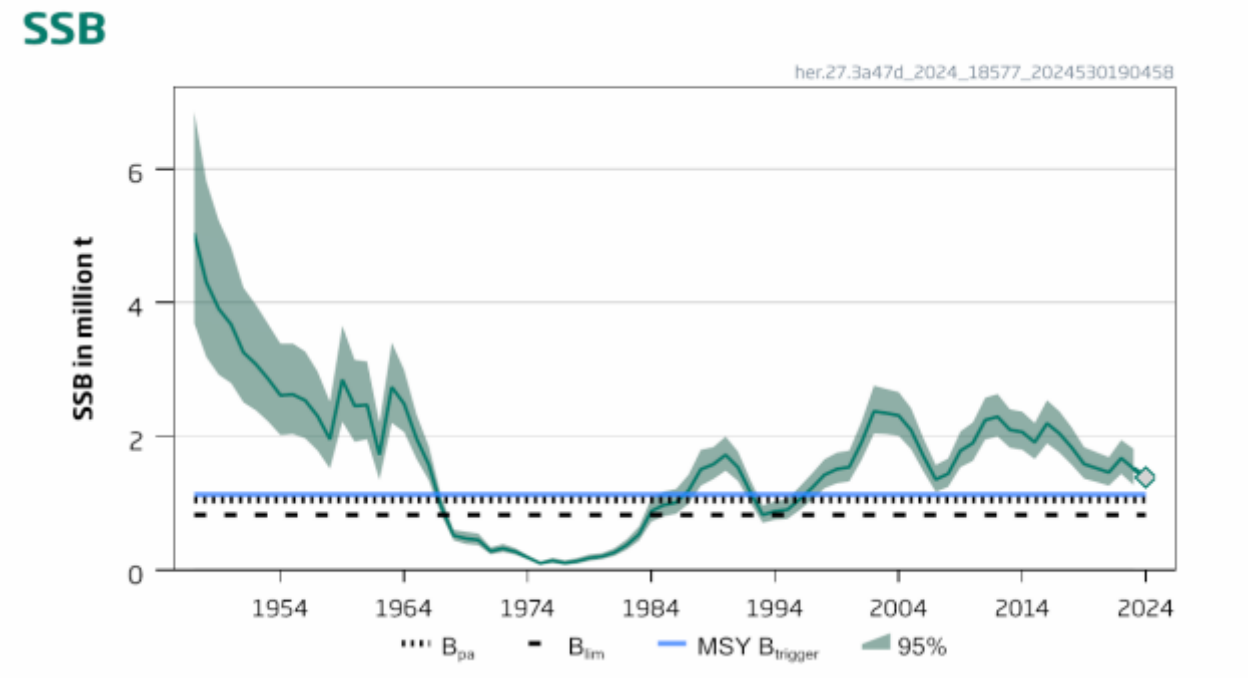
All fishery removals are included and C1.1 is met.

C1.2 The species is considered, in its most recent stock assessment, to have a biomass above the limit reference point (or proxy), OR removals by the fishery under assessment are considered by scientific authorities to be negligible.

The annual ICES advice includes an estimate of the status of the stock relative to established target and limit reference points. The November 2024 advice states that "Fishing pressure on the stock is below $F_{MSY,}$ and the spawning-stock size is above MSY $B_{trigger}$, B_{pa}, and B_{lim}" (ICES, 2024). SSB in 2024 was estimated to be 1,386,370t, against a limit reference point (B_{lim}) of 828,874t.

The diagram below shows the time series of SSB estimates and demonstrates that the stock size has been above the current target and limit reference points since the late 1990s. Total annual catch is restricted via a TAC which varies according to the state of the stock, and largely in line with ICES advice.

The results of the most recent herring stock assessment indicate that stock biomass is above the target and limit reference points, and C1.2 is met.



Herring in ICES Subarea 4 and Divisions 3.a and 7.d, autumn spawners. Estimated SSB relative to current reference points (ICES 2024)

References

ICES (2024). Herring (*Clupea harengus*) in Subarea 4 and divisions 3.a and 7.d, autumn spawners (North Sea, Skagerrak and Kattegat, eastern English Channel). Replacing advice provided in May 2024. ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27677718.v3

Links	
MarinTrust Standard clause	1.3.2.2
FAO CCRF	7.5.3
GSSI	D.3.04, D5.01

Species Name	Whiting, *Merlangius merlangus*, in ICES Subarea 4 (North Sea) & Division 7d (eastern English Channel)	
C1	**Category C Stock Status - Minimum Requirements**	
	C1.1 Fishery removals of the species in the fishery under assessment are included in the stock assessment process, OR are considered by scientific authorities to be negligible.	PASS
	C1.2 The species is considered, in its most recent stock assessment, to have a biomass above the limit reference point (or proxy), OR removals by the fishery under assessment are considered by scientific authorities to be negligible.	PASS
	Clause outcome:	PASS

C1.1 Fishery removals of the species in the fishery under assessment are included in the stock assessment process, OR are considered by scientific authorities to be negligible.

An annual stock assessment is conducted by the ICES Working Group on the Assessment of Demersal Stocks in the North Sea and Skagerrak (WGNSSK), and used to produce catch recommendations for the stock. All fishery removals for the stock are incorporated into the stock assessment, an effort assisted by mandatory catch reporting and landings obligation rules in place in the EU. Total landings of whiting in 2023 were estimated to be 24,957t in Subarea 4, and 2,602t in Division 7d (ICES 2024). Both totals include catch from the sandeel fisheries covered by this assessment.

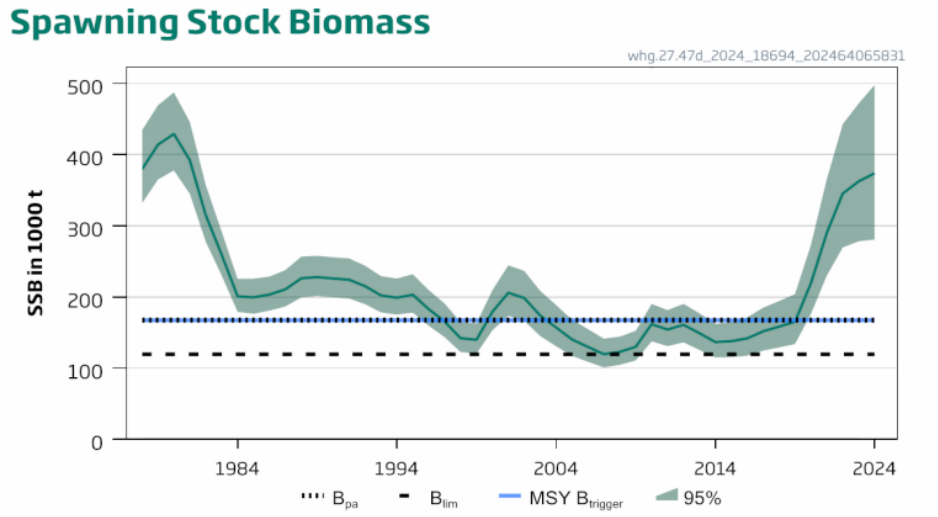
Fishery removals are accounted for in the stock assessment process and C1.1 is met.

C1.2 The species is considered, in its most recent stock assessment, to have a biomass above the limit reference point (or proxy), OR removals by the fishery under assessment are considered by scientific authorities to be negligible.

The annual ICES advice includes an estimate of the status of the stock relative to established target and limit reference points. The October 2024 advice states that "Fishing pressure on the stock is below F_{MSY}, and the spawning-stock size is above MSY $B_{trigger}$, B_{pa}, and B_{lim}" (ICES, 2024). SSB in 2025 was projected to be 364,887t, against a limit reference point (B_{lim}) of 119,585t.

The graph below shows the time series of SSB estimates and demonstrates that the stock size has been above the current target and limit reference points in recent years. Total annual catch is restricted via separate TACs for Subarea 4 and Division 7d, both of which vary according to the state of the stock, and are largely in line with ICES advice.

The 2024 whiting stock assessment concluded that stock biomass is currently above both the target and limit reference points, and C1.2 is met.



Whiting in ICES Subarea 4 and Division 7.d. Estimated SSB relative to current reference points (ICES 2024)

References

ICES (2024). Whiting (*Merlangius merlangus*) in Subarea 4 and Division 7.d (North Sea and eastern English Channel). Replacing advice provided in June 2024. ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27211443.v2

Links	
MarinTrust Standard clause	1.3.2.2
FAO CCRF	7.5.3
GSSI	D.3.04, D5.01

Species Name	**Mackerel, *Scomber scombrus*, in ICES Subareas 1-8 & 14 & Division 9a (Northeast Atlantic and adjacent waters)**	
C1	**Category C Stock Status - Minimum Requirements**	
	C1.1 Fishery removals of the species in the fishery under assessment are included in the stock assessment process, OR are considered by scientific authorities to be negligible.	PASS
	C1.2 The species is considered, in its most recent stock assessment, to have a biomass above the limit reference point (or proxy), OR removals by the fishery under assessment are considered by scientific authorities to be negligible.	PASS
	Clause outcome:	PASS

C1.1 Fishery removals of the species in the fishery under assessment are included in the stock assessment process, OR are considered by scientific authorities to be negligible.

An annual stock assessment is conducted by the ICES Working Group on Widely Distributed Stocks (WGWIDE), and is used to produce catch recommendations for the stock. All fishery removals for the stock are incorporated into the stock assessment, an effort assisted by mandatory catch reporting and landings obligation rules in place in the EU. Total catches of mackerel in 2023 across all areas were estimated to be 1,056,241t. This total includes catch from the sandeel fisheries covered by this assessment (ICES 2024).

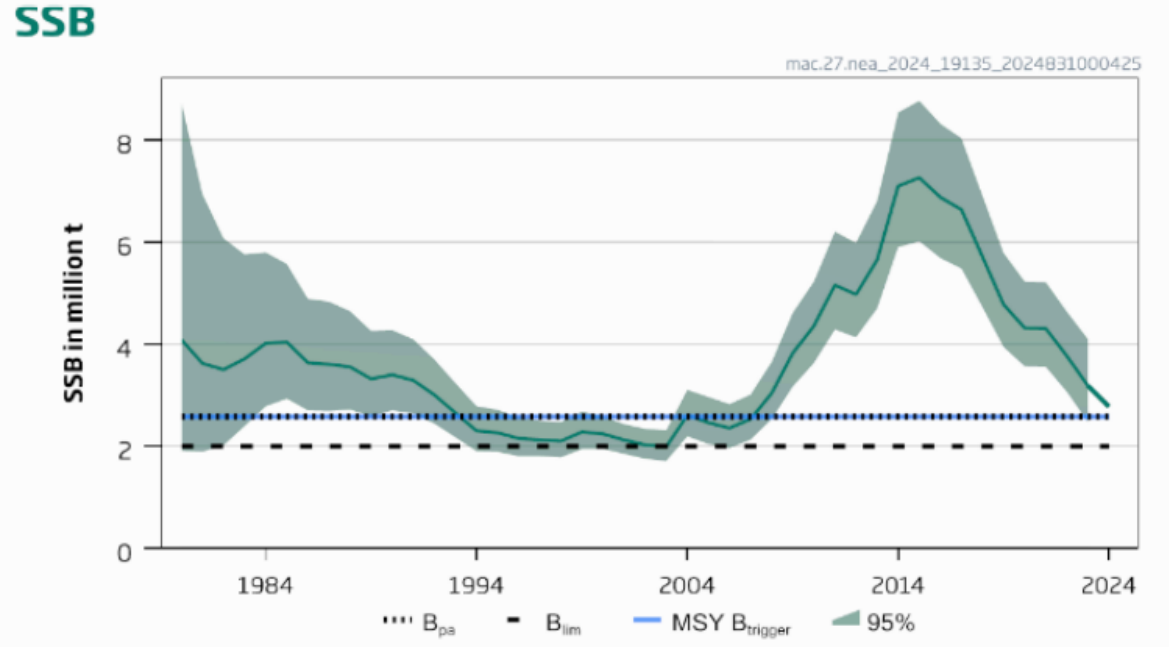
Fishery removals are accounted for in the stock assessment process and C1.1 is met.

C1.2 The species is considered, in its most recent stock assessment, to have a biomass above the limit reference point (or proxy), OR removals by the fishery under assessment are considered by scientific authorities to be negligible.

The annual ICES advice includes an estimate of the status of the stock relative to established target and limit reference points. The September 2024 advice states that "Fishing pressure on the stock is above F_{MSY} and between F_{pa} and F_{lim}; spawning-stock size is above MSY $B_{trigger}$, B_{pa}, and B_{lim}" (ICES, 2024). SSB in 2024 was estimated to be 2,774,753t, against a limit reference point (B_{lim}) of 2,000,000t.

The graph below shows the time series of SSB estimates and demonstrates that the stock size has been above both the target and limit reference points since the mid-2000s. Total annual catch is restricted via TACs.

As noted in the initial and first surveillance assessments, there has been no agreement on total international catch since 2009, and total landings are frequently above the ICES recommended level. The failure to agree an international TAC is reflected in the long-term decline in estimated SSB since around 2015. If the decline continues in coming years, it is possible that the stock will fall below B_{lim}, in which circumstance it would no longer meet MT requirement C1.2. However, at the present time, biomass remains above the target and limit reference points, and C1.2 is met.



Mackerel in ICES Subareas 1-8 and 14, and Division 9.a. Estimated SSB relative to current reference points (ICES 2024)

References

ICES (2024). Mackerel (*Scomber scombrus*) in subareas 1–8 and 14 and Division 9.a (the Northeast Atlantic and adjacent waters). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019339.v1

Links	
MarinTrust Standard clause	1.3.2.2
FAO CCRF	7.5.3
GSSI	D.3.04, D5.01

FURTHER IMPACTS

The three clauses in this section relate to impacts the fishery may have in other areas. A fishery must meet the minimum requirements of all three clauses before it can be recommended for approval.

F1	Impacts on ETP Species - Minimum Requirements		
	F1.1	Interactions with ETP species are recorded.	PASS
	F1.2	There is no substantial evidence that the fishery has a significant negative effect on ETP species.	PASS
	F1.3	If the fishery is known to interact with ETP species, measures are in place to minimise mortality.	PASS
		Clause outcome:	PASS

There have been no substantial changes in the understanding of the potential impacts of the fishery on ETP species since the time of the initial MT assessment. A summary of the outcomes of that assessment is provided here for convenience; for more details, please refer to the 2023 assessment report.

F1.1 Interactions with ETP species are recorded.

Interactions with ETP species are recorded as required by EU and UK legislation (for example EC Regulation 812/2004 and EU Regulation 2017/10042) and are submitted to the ICES Working Group on Bycatch of Protected Species (WGBYC) for analysis. As noted previously, a report is published by the WGBYC annually, with the most recent produced in 2023 (ICES 2023). The report contains detailed information on the data sources used to inform the activities of the group. Bycatch data, including those submitted by the Danish, Norwegian and UK fleets, are used by the WGBYC to estimate bycatch rates and overall impacts of fisheries on ETP species in the waters covered by ICES.

F1.2 There is no substantial evidence that the fishery has a significant negative effect on ETP species.

As described in the initial MT assessment, the 2016 ICES sandeel benchmarking report noted that bycatch of sea mammals and birds is very low, stating that it is "undetectable using observer programmes" (ICES 2017, page 23). The 2023 benchmark does not appear to have revised this conclusion, with the benchmark report not mentioning ETP species or marine mammals, nor the direct impacts of the fishery on seabirds (ICES 2024).

F1.3 If the fishery is known to interact with ETP species, measures are in place to minimise mortality.

There is no evidence to indicate the fishery regularly interacts with ETP species, and therefore no such measures are required to be in place. However, some general measures are in place across EU fisheries, such as the reporting requirements listed in F1.1 above, and a recently proposed Action Plan for further protecting ecosystems and vulnerable species (EC 2023).

References

EC (2023). Fisheries, aquaculture and marine ecosystems: transition to clean energy and ecosystem protection for more sustainability and resilience. https://ec.europa.eu/commission/presscorner/detail/en/ip_23_828

ICES (2017). Report of the Benchmark Workshop on Sandeel (WKSand). ICES Expert Group reports (until 2018). Report. https://doi.org/10.17895/ices.pub.7718

ICES (2023). Working Group on Bycatch of Protected Species (WGBYC). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.24659484.v2

ICES (2024). Benchmark Workshop on Sandeel (*Ammodytes spp*.) (Outputs from 2022 and 2023 meetings) (WKSANDEEL). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.21581151.v2

Links	
MarinTrust Standard clause	1.3.3.1
FAO CCRF	7.2.2 (d)
GSSI	D4.04, D.3.08

F2	Impacts on Habitats - Minimum Requirements		
	F2.1	Potential habitat interactions are considered in the management decision-making process.	PASS
	F2.2	There is no substantial evidence that the fishery has a significant negative impact on physical habitats.	PASS
	F2.3	If the fishery is known to interact with physical habitats, there are measures in place to minimise and mitigate negative impacts.	PASS
		Clause outcome:	PASS

There have been no substantial changes in the understanding of the potential impacts of the fishery on habitats since the time of the 2024 surveillance assessment. One minor change since the initial assessment, incorporated into the surveillance, was an improvement in the understanding of the gears used in the fishery; however, this did not affect the outcome of the assessment. The gears used in the sandeel fishery were previously thought to be "pelagic trawls". Updated information indicates they are "midwater trawls" which may make some contact with the sea bed, primarily via trawl doors and ground rope, but which are still "not intended to have contact with the bottom while fishing" (FAO 2024).

F2.1 Potential habitat interactions are considered in the management decision-making process.

As noted in the initial assessment, the MarinTrust fishery assessment guidance states that "good practice requires there to be a strategy in place that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to habitat types". Such a strategy is not required for the specific fishery under assessment here, as due to the gear type used it fundamentally does not pose such a risk. However, in general terms the potential impacts of fisheries on habitats are considered throughout the management process in both the EU and Norway.

F2.2 There is no substantial evidence that the fishery has a significant negative impact on physical habitats.

The midwater gears used in the sandeel fishery under assessment are not intended to interact with the seabed and are therefore considered unlikely to have a significant negative impact on seabed habitats. No evidence was encountered during the completion of this assessment report to indicate that the fishery has a significant impact on physical habitats.

F2.3 If the fishery is known to interact with physical habitats, there are measures in place to minimise and mitigate negative impacts.

The pelagic gears used in the Danish component of the sandeel fishery are considered unlikely to interact with seabed habitats. However, the protection of sensitive habitats throughout the area covered by this MT assessment is regulated through the international convention on biodiversity (OSPAR 03/17/1, Annex 9), and the corresponding national legislation (Natura2000 in Denmark, National Order No. 1048/2013). There are a series of Marine Protected Areas in the North Sea.

References

FAO (2024). Fishing Techniques. Sandeel midwater trawling. Technology Fact Sheets. In: Fisheries and Aquaculture. Rome. https://www.fao.org/fishery/en/fishtech/1086/en

Links	
MarinTrust Standard clause	1.3.3.2
FAO CCRF	6.8
GSSI	D.2.07, D.6.07, D3.09

F3	Ecosystem Impacts - Minimum Requirements		
	F3.1	The broader ecosystem within which the fishery occurs is considered during the management decision-making process.	PASS
	F3.2	There is no substantial evidence that the fishery has a significant negative impact on the marine ecosystem.	PASS

	F3.3	If one or more of the species identified during species categorisation plays a key role in the marine ecosystem, additional precaution is included in recommendations relating to the total permissible fishery removals.	PASS
		Clause outcome:	PASS

There have been no substantial changes in the understanding of the potential impacts of the fishery on ecosystems since the time of the initial MT assessment. A summary of the outcomes of that assessment is provided here for convenience; for more details, please refer to the 2023 assessment report.

F3.1 The broader ecosystem within which the fishery occurs is considered during the management decision-making process.

The potential ecosystem impacts of fisheries are primarily taken into account in the management process by ICES. A key component of this is the development of ecosystem overviews, the outcomes of which are incorporated into Working Group discussions and recommendations. The relevant ICES ecoregion to this fishery is the Greater North Sea (ICES 2022). In addition to this high-level ecosystems consideration, the potential impacts of the fishery on the North Sea ecosystem are also considered by the HAWG during stock assessment and catch advice development. Finally, ecosystem considerations form part of the stock annex and benchmarking processes for all four sandeel stocks.

F3.2 There is no substantial evidence that the fishery has a significant negative impact on the marine ecosystem.

The sandeel stock annexes include an exploration of the potential impacts of low forage fish abundance on dependant predators, compared to the proportion of each predator's diet which is known to be made up of sandeel (ICES 2019). While marine mammals and fish are generally found to be at low risk of localised sandeel depletion, a number of seabird species are considered vulnerable in the North Sea. These include sandwich tern (*Sterna sandvicensis*); Arctic tern; great skua (*Catharacta skua*); Arctic skua; guillemot (*Uria aalge*); and Kittiwake (*Rissea tridactyla*) (ICES 2019).

Industrial sandeel fishing has been banned in English and Scottish waters since March 2024. A key motivation for the ban was to mitigate ecosystem impacts of the fishery, with one Cefas report concluding that "a full prohibition of sandeel fishing in the UK waters of the North Sea would lead to an increase in seabird biomass of 7% in around 10 years" (Cefas 2023). This reflects the understanding of potential impacts on seabird populations identified in the initial assessment.

F3.3 If one or more of the species identified during species categorisation plays a key role in the marine ecosystem, additional precaution is included in recommendations relating to the total permissible fishery removals.

ICES recognises the importance of sandeel in North Sea food webs, and has previously advised that management of the sandeel fisheries should ensure that sandeel abundance be maintained high enough to provide food for a variety of predator species (ICES 2017). By including natural mortality estimates when making catch recommendations, ICES introduces additional precaution to reflect the important role of sandeel in the North Sea ecosystem.

References

Cefas (2023). What are the ecosystem risks and benefits of full prohibition of industrial Sandeel fishing in the UK waters of the North Sea (ICES Area IV)? https://www.gov.uk/government/publications/evidence-report-on-the-ecosystem-impacts-from-industrial-sandeel-fishing

ICES (2017). Report of the Benchmark Workshop on Sandeel (WKSand). ICES Expert Group reports (until 2018). Report. https://doi.org/10.17895/ices.pub.7718

ICES (2019). Stock Annex: Sandeel (*Ammodytes marinus*) in the North Sea area 1 (SA1). ICES Stock Annexes. Report. https://doi.org/10.17895/ices.pub.18623159.v1

ICES (2022). Greater North Sea ecoregion – Ecosystem Overview. ICES Advice: Ecosystem Overviews. Report. https://doi.org/10.17895/ices.advice.21731912.v1

Links

MarinTrust Standard clause	1.3.3.3
FAO CCRF	7.2.2 (d)
GSSI	D.2.09, D3.10, D.6.09

SOCIAL CRITERION

In addition to the scored criteria listed above, applicants must commit to ensuring that vessels operating in the fishery adhere to internationally recognised guidance on human rights. They must also commit to ensuring there is no use of enforced or unpaid labour in the fleet(s) operating upon the resource.

Appendix A - Determining Resilience Ratings

The assessment of Category B species described in this assessment report template utilises a resilience rating system suggested by the American Fisheries Society. This approach was chosen because it is also used by FishBase, and so the resilience ratings for many thousands of species are freely available online. As described by FishBase, the following is the process used to arrive at the resilience ratings:

"*The American Fisheries Society (AFS) has suggested values for several biological parameters that allow classification of a fish population or species into categories of high, medium, low and very low resilience or productivity (Musick 1999). If no reliable estimate of r_m (see below) is available, the assignment is to the lowest category for which any of the available parameters fits. For each of these categories, AFS has suggested thresholds for decline over the longer of 10 years or three generations. If an observed decline measured in biomass or numbers of mature individuals exceeds the indicated threshold value, the population or species is considered vulnerable to extinction unless explicitly shown otherwise. If one sex strongly limits the reproductive capacity of the species or population, then only the decline in the limiting sex should be considered. We decided to restrict the automatic assignment of resilience categories in the Key Facts page to values of K, t_m and t_{max} and those records of fecundity estimates that referred to minimum number of eggs or pups per female per year, assuming that these were equivalent to average fecundity at first maturity (Musick 1999). Note that many small fishes may spawn several times per year (we exclude these for the time being) and large live bearers such as the coelacanth may have gestation periods of more than one year (we corrected fecundity estimates for those cases reported in the literature). Also, we excluded resilience estimates based on r_m (see below) as we are not yet confident with the reliability of the current method for estimating rm. If users have independent r_m or fecundity estimates, they can refer to Table 1 for using this information*."

Parameter	High	Medium	Low	Very low
Threshold	0.99	0.95	0.85	0.70
r_{max} (1/year)	> 0.5	0.16 - 0.50	0.05 - 0.15	< 0.05
K (1/year)	> 0.3	0.16 - 0.30	0.05 - 0.15	< 0.05
Fecundity (1/year)	> 10,000	100 - 1000	10 - 100	< 10
t_m (years)	< 1	2 - 4	5 - 10	> 10
t_{max} (years)	1 - 3	4 - 10	11 - 30	> 30

[Taken from the FishBase manual, "Estimation of Life-History Key Facts", http://www.fishbase.us/manual/English/key%20facts.htm#resilience]

Appendix B – Peer Review Comments

MarinTrust Fishery Assessment Peer Review Template

This section comprises a summary of the fishery being assessed against version 2 of the MarinTrust Standard.

Fishery under assessment	*WF04 Sandeel in ICES Divisions 4a-c (FAO Fishing Area 27)*
Management authority (Country/State)	EU (Denmark); UK, Norway
Main species	Sandeel (*Ammodytes marinus*)
Fishery location	FAO Area 27, ICES Divisions 4a-c
Gear type(s)	Midwater trawl
Overall recommendation. (PASS)	There is currently no evidence of non-compliance with stock closures around 3ar and 4a; the fishery may therefore currently meet the MT requirements. However, if catches are recorded in 2025, this should result in the certificate being suspended under A3.3. Furthermore, due to gear changes since the first complete assessment, more evidence is required under F. It's also considered that ecosystem considerations haven't been evaluated. Additional evidence should be provided before the Peer review can make an overall recommendation on Approve/Fail. Follow-up comments: PR considers the fishery passes scoring sections on Management, stock assessments, and ETP interactions. However, without evidence confirming that only mid-water otter trawls are used throughout the 'whole fishery' from which a factory could source, there is insufficient evidence presented by the auditor to support findings against F2 (Habitat impacts). Furthermore, there is no consideration of the new ecosystem interactions reports or discussion around the UK EEZ closures, for which ecosystem function was a primary driver. In addition to the habitat interaction concerns, I therefore conclude that the evidence presented to justify F3.2 (ecosystem impacts) is insufficient. Follow-up comments: PR agrees with the additional justifications added regarding the UK EEZ closure and ecosystem impacts under F3.2 and further agrees, without further evidence, that the Danish fleet is using other gear types in addition to mid-water trawls, F2 is also met. This fishery meets the MT Whole Fish Requirements. However, the issues

	documented here should be followed up on in more detail at the next reassessment.

Summary: in this section, provide any additional information about the fishery that the reviewers feel is significant to their decision.
The report is well-written, although in some parts, it requires further justification or evidence to support the scoring. Overall, the report follows the MT guidance.
General Comments on the Draft Report provided to the peer reviewer
Some of the scoring justifications across different Sandeel management areas are the same (e.g., A1) and copied across. Although this is reasonable, the scoring text should be edited to provide area-specific context, supported by evidence where relevant. Main concerns are around 3ar, habitat interactions and ecosystem function.

Summary of Peer Review Outcomes

Peer reviewers should review the fishery assessment report with the primary objective of answering the key questions listed in the table below. Where the situation is more complicated, reviewers may instead answer "See Notes".

	YES	NO	See Notes
A – Fishery Assessment			
1. Has the fishery assessment been fully completed, using the recognised MarinTrust fishery assessment methodology and associated guidance?	X		
2. Does the Species Categorisation section of the report reflect the best current understanding of the catch composition of the fishery?	X		X
3. Are the scores in the following sections accurate (i.e. do the scores reflect the evidence provided)?	X		
Section M - Management	X		
Category A Species	X		X
Category B Species	N.A.		
Category C Species	X		
Category D Species	N.A.		
Section F – Further Impacts	X		X

Detailed Peer Review Justification

Peer reviewers should provide support for their answers in the boxes provided, by referring to specific scoring issues and any relevant documentation as appropriate.

Detailed justifications are only required where answers given are one of the 'No' options. In other (Yes) cases, either confirm 'scoring agreed' or identify any places where weak rationales could be strengthened (without any implications for the scores).

Boxes may be extended if more space is required.

1. Is the scoring of the fishery consistent with the MarinTrust standard, and clearly based on the evidence presented in the assessment report?
The peer reviewer has concerns with the scoring, primarily from the 'assumption' that the fishery will be closed and may meet the requirements soon. Additionally, some of the contradictory scoring rationales are detailed below. Some of the evidence provided is not from the relevant management authority, and therefore, it is unclear how some of the requirements are met. Historically, catches are consistently above advised and set TACs which don't lend itself to a well-managed fishery. This is primarily put down to the quota-flex problem. Some allowances were made during the initial assessment (2023), in good faith, as the industry and regulators were in consultation. However, two years later, little progress has been made to address this issue in the long term. MT guidance states, "*If a single criterion fails, the whole fish fishery shall not be approved.*" It's unclear, based on the justifications and evidence referenced so far, how the fishery meets some of the MT requirements. Furthermore, the auditor recommended that "Overall, the assessor recommends the approval of this fishery be maintained, but reiterates that any sandeel which originates from Sa3r and SA4 in 2025 should not be used for the production of MT-certified products." This poses a serious labelling risk to MT, as the certificate indicates that catches from these areas are certified. In addition to the current wording, it should be advised to ask the on-site auditor to verify that no catches come from SA3r or SA4 Sandeel areas, as this would indicate that A4.1

is not met; if catches have been landed, the CAB should suspend the *WF04 Sandeel in ICES Divisions 4a-c (FAO Fishing Area 27)* certificate.

Follow-up after initial PR - Thank-you for adding the comments to onsite factory audit *or confirming it was already there! No further comments here.

Certification body response

The situation in the fishery, at the time of the assessment, was that it meets the requirements (notwithstanding other specific comments in the relevant section). The complication is that – at the time of the report – the TACs had not all been set. I fully appreciate this may cause an issue if these SAs are opened for fishing; however, it is always a possibility that a fishery which has been approved breaches the requirements during the year between assessments. My position is that the conclusions of the assessment report are correct at the date they were written, and that monitoring the fishery (and potentially suspending approval) over the coming year is the job of other components of the MT process. Whether or not the procedures already in place are sufficient to monitor the situation is an important question.

I don't think it's fair to say they're consistently above. There has certainly been a problem with catches sporadically exceeding the advice, and this has been more of a problem in some SAs than others.

I think it's too early to say that little progress has been made in tackling the quota flex problem. Since the initial assessment, landings in all four areas have been below the limit recommended by ICES, even when that limit was 0t or a small monitoring TAC. Quota flex may well become a problem again in the future – in which case the fishery will again be penalised – but for the time being it does not appear to be causing TACs to be exceeded.

I agree that there is a risk to listing these SAs as "approved"; MT needs to make sure that the mechanisms in place to monitor fisheries between assessments are sufficiently robust to mitigate this risk.

The request to verify the catches from SA4 and SA3 are in the report.

2. Has the fishery assessment been fully completed, using the recognised MARINTRUST fishery assessment methodology and associated guidance?

It is apparent that the Marin Trust fishery assessment methodology and associated guidance have been followed, but some evidence gaps remain – see below.

Certification body response

3. Does the Species Categorisation section of the report reflect the best current understanding of the catch composition of the fishery?

The species categorisation looks accurate but is based on outdated information – the Swedish fleet is up to 2022. Nevertheless, Sweden is not mentioned in the management table or as a country with vessels targeting sandeel stocks, so it's unclear how it's incorporated into the scoring beyond species categorisation. Finally, there are no catch compositions for Norway fleets, although the MSC report is referenced, so maybe this is a mistake in the text, and Norwary catches up to 2021 are considered. The Danish fleet, which is the largest fleet, uses catch data up to 2021, but this is > 3 years old, and it's not clear how the auditor has confirmed catch compositions remain similar, based on more up-to-date evidence.
Understandably, the UK fleet has not been operating in the UK in the past few years; however, it is worth noting that there is some quota for UK vessels, and these catches are not considered in the species categorisation tables.

Given the changes in climate drivers and species distribution, it could be considered even more critical that species compositions are based on up-to-date information. MSC surveillance reports would report a change in

catch. Still, the Danish fleet, which is the most significant contributor to catches, is no longer certified and therefore can no longer be used as a reliable source of evidence. MT Guidance states "*Given possible fluctuations in catch composition, it is recommended to use data from at least the previous 3 years (or a more extended period if data is accessible) when determining the suitable species category. Depending on data availability, a different length of time series can be used. The assessor should provide a rationale for the duration chosen.*"
Follow-up after initial PR – is it not the factory's responsibility to ensure the auditor has everything they need, i.e., up-to-date catch data, if that's really what's required by the MT guidance? Or maybe it's just guidance, and that is the workaround. But if we're happy to pass a fishery on out-of-date catch data and they keep passing, what's to incentivise them to get better data… or improve data collection? I had a similar comment on the initial assessment, and it's worrying that it hasn't been addressed, especially with one surveillance down. It wasn't mentioned at the last surveillance either, so maybe other PRS didn't pick up on it. Which raises the question: Does MT have a system for tracking auditor/PR recommendations/concerns? The factory &/OR auditor can review information here - Landinger - SAS® Visual Analytics, or maybe try here - Index of /stat- but both are in Danish (Sandeel is Tobis in Danish). Furthermore, grouped and anonymised data can be requested from the government ahead of any planned audit; timescales are sufficient for this to be done in advance, so it does not hinder surveillance timelines.
Certification body response
Species categorisation is often a challenging part of an assessment, which is frustrating because it is also one of the most important parts. It is often difficult to get up-to-date and accurate information about the specific fleets under assessment, and assessors frequently have to be pragmatic about categories. However, there is a range of evidence indicating that sandeel-targeting vessels catch >98% sandeel, and I am comfortable with the species categorisation as it currently stands. This said, if the PR is aware of specific sources of catch composition data which have not been included – which I very much accept might exist! – then I'd be happy to incorporate them. I would also re-iterate that this is a surveillance assessment, therefore the usual approach is to retain the species categorisation of the initial assessment unless there is evidence that it has changed. "Given the changes in climate drivers and species distribution, it could be considered even more critical that species compositions are based on up-to-date information" I completely agree with this, and if a reliable source can be found, then I will absolutely use it.

3M. Are the scores in "Section M – Management" clearly justified?	YES

M1.1 There is an organisation responsible for managing the fishery.	YES
M1.2 There is an organisation responsible for collecting data and assessing the fishery.	YES
M1.3 Fishery management organisations are publicly committed to sustainability.	YES
M1.4 Fishery management organisations are legally empowered to take management actions.	YES
M1.5 There is a consultation process through which fishery stakeholders are engaged in decision-making.	YES
M1.6 The decision-making process is transparent, with processes and results publicly available.	YES
M2.1 There is an organisation responsible for monitoring compliance with fishery laws and regulations.	See comments
M2.2 There is a framework of sanctions which are applied when laws and regulations are discovered to have been broken.	YES
M2.3 There is no substantial evidence of widespread non-compliance in the fishery, and no substantial evidence of IUU fishing.	YES
M2.4 Compliance with laws and regulations is actively monitored, through a regime which may include at-sea and portside inspections, observer programmes, and VMS.	YES

Opening paragraph M1 "*The assessor was unable to find any evidence to suggest that the ban has been breached by EU or UK vessels.*" – What evidence was checked? Was MMO or Marine Scotland contacted for breaches in UK closures by EU or UK vessels?

M2 – The UK or Norwegian management structures are not mentioned throughout M2 scoring.

Follow-up after initial PR – These have not been addressed. I can live with the first one, but shouldn't Norway and the UK be included - Or are they left out because the factory only sources from the Danish fleet? If so, I don't see this as a reason not to score those components as the MT certificate and 'whole fishery assessment' imply. They could source from the whole fishery, irrespective of which flag the vessel sails under, and I doubt any factory audit checks what flag the vessels landing at the factory sail under.

Certification body response

3A. Are the "Category A Species" scores clearly justified? No.

Sandeel 3r –

A1—As this is the Norwegian area of the sandeel fishery, it would be appropriate to tailor the justification to include Norwegian data—this also applies to A1.2 and the IMR stock assessment.

A2 – Why is the IMR stock assessment not mentioned here? Do the results of this align with the ICES advice? The IMR Stock assessment and advice is mentioned in justifications for A3.2 so it stands to reasons it is applicable here also.

A3.2 – The reviewer does not confirm if the 2024 catches for sandeel were from a sampling survey, see ICES advice "*Catches should not exceed 5 000 tonnes and should have an associated sampling protocol in the fishery (ICES, 2024b)*". In any case, one year above the recommended catch of 0 wouldn't breach the requirement of '*regularly exceed*', but it could be considered as evidence that the advice is not followed, or the fishery is being closed.

A3.3 – No evidence was provided that the Norwegian fishery will be closed in 2025. The News article echoes the advice to have a 0 TAC but does not indicate that fishing is prohibited OR how much quota has been banked from 2024. The sandeel fishery does operate in the earlier parts of the year, before the release of updated IMR advice in May, so it is possible boats are out fishing already. On the whole, the scoring here is also contradictory: "*Conclusive evidence could not be found*", and "*At the time of writing, managers have implemented the ICES*

and IMR recommendations to close the fishery in 2025. The stock is considered to Pass clause A3.3, assuming that no catch will be taken in this area in 2025."

In the absence of evidence, ongoing problems with quota banking and the declining stock status, now below reference points, should all be considered in the scoring justification for this stock area.

A4.1—Similar problems as stated above. Audits are based on evidence. In the absence of current evidence, we can use historical records, which, with the current quota banking problem, don't seem to go hand in hand with the 'assumption' that there will be 0 catches in 2025. A stronger justification is needed to meet A4.1.

Sandeel 4

A1.1 – This justification should be specific to the catch area.

A4.1 – Unlike 3r, and although in 2019 and 2022 the monitoring TAC was exceeded, there is evidence of 0 catches following the closure in 2024 and a written record of a 0 TAC for 2025. This requirement is well evidenced and therefore met.

Follow-up after initial PR – Thank you for your responses and pulling out some further information from the initial assessment report that was not repeated for efficiency but is important in the scoring rationales.

Regarding the IMR stock assessment, "*international landings exceeded the ICES advice in 2017, 2019, and 2020; in 2017 and 2020 the advice was exceeded by more than 10%...*" and for "*Norwegian advice... the catch exceeded the recommendation in 2018, 2019 and 2021. In none of these years was the advice exceeded by more than 10%.*" – So, in the past 5 years, every year has exceeded either the IMR or ICES catch recommendations. This amounts to "regularly exceeding" the catch recommendations, but with the declining stock status, A3.2 may look more favourable under A3.2 against IMR advice, as it hasn't exceeded the 10% limit previously, whereas ICES has. This presents a situation where the evidence could be cherry-picked to support a pass/fail. Now it's only in recent years that the stock is below the limit reference points, so the limit in excess of 10% now applies. But having the evidence aligned across all Scoring points means it is clear to the peer reviewer and any stakeholder that the same evidence has been considered for each point.

Adding IMR stock assessment process details is an easy addition to scoring rationales in A2, as it focuses on how the stock assessment is completed, which should be the same as the initial assessment. This sets up the scoring in A3, which utilises the IMR stock assessment in A3.2, where it's used to justify catches within <10% of the scientific advice, just not the ICES scientific advice, which is the subject of A2.

I agree that it's reasonable to focus on one stock assessment when scoring or noting the differences. Still, the MT assessment/surveillance should present changes to both and prioritise the stock assessment with the most 'negative' outlook. Both approaches are based on good data and the best available models; therefore, it's not a question of which is more accurate, but which is more cautious.

It's also noted that no differences, whether agreed upon or disagreed with, are discussed within any of the scoring rationales.

I recommend including one or two sentences at the top of each stock assessment box where there are two competing stock assessments to explain how you approached this scoring, as it's not clear to the reader of the report.

Certification body response

A1 : The simplified answer is that incorporating the IMR assessment in detail would be enormously complicated. The IMR does not provide advice for sandeel based on the same management units as ICES, but rather for sandeel in the Norwegian EEZ (which covers most, but not all, of SA3r), and for five sub-stocks within this area. There may be a discussion to be had on formalising the MT approach to assessing a fish stock managed under multiple different stock assessment, but the pragmatic approach taken in this and previous MT sandeel assessments has been to consider it sufficient to only describe the ICES assessment – which covers the whole

of SA3r – in detail, and make reference to the IMR assessment only to the extent that it agrees or disagrees with the ICES conclusions.

A3.2 : This is a good point and I will look into it

A3.3 : My understanding is that the Norwegian fishery applies the IMR advice by default, and so a recommendation to close is essentially the same as a closure. However I very much appreciate I didn't say this in the surveillance report, nor did I provide any evidence to prove it, so I think the PR comments here are entirely valid.

"how much quota has been banked from 2024" - I believe there is no quota flex in the Norwegian fishery – although I appreciate this has not been spelled out in the surveillance (it was noted in the initial assessment).

"*Conclusive evidence could not be found*", and "*At the time of writing, managers have implemented the ICES and IMR recommendations to close the fishery in 2025. The stock is considered to Pass clause A3.3, assuming that no catch will be taken in this area in 2025* : I agree, this is contradictory, and should have been less definite about managers implementing the advice. I suggest that alongside discussions about how to best monitor the situation of the fishery over the coming year, I also dig out some additional evidence that the fishery has remained closed up to now.

A4.1 : Agree, any changes to A3.3 also apply here. However I would note that quota flex has not really been a big problem in SA3r, as it does not apply to Norwegian vessels.

3B. Are the "Category B Species" scores clearly justified? N.A
Certification body response

3C. Are the "Category C Species" scores clearly justified? YES
No comments. The report section is well written and has up-to-date and relevant references.
Certification body response

3D. Are the "Category D Species" scores clearly justified? N.A
Certification body response

3F. Are the scores in "Section F – Further Impacts" clearly justified? Partially
F1 – F1.1 – What about other countries targeting sandeel? Are they one of the eighteen countries reporting evidence to the ICES report? F1.2 The Sandeel stock assessment benchmark report is not a good source of evidence, as it doesn't specifically review interactions with Birds or ETP species. The WGBYC report details interactions with bycatch species, not explicitly tied to the sandeel fishery. Still, Tor D, details priority areas of poor data quality – the report provides evidence that mid-water trawl in the North Sea is considered well-evidenced. F2 - As the gear type has changed since the complete assessment, more comprehensive scoring and evidence should be provided. It's also worth noting the MSC Norwegian Sandeel fishery was certified for Midwater and

Bottom trawls, so it's unlikely this is just a Mid-water trawl fishery and interactions with the seabed are happening regularly in this fishery…
Opening comments state "*midwater trawls" which may make some contact with the sea bed, primarily via trawl doors and ground rope, but which are still "not intended to have contact with the bottom while fishing*". There are also examples from MSC-certified fisheries where mid-water trawls regularly interact with the seabed, depending on species ecology. Sandeels burrow into the seabed at night; therefore, when the fishery is operating, the catch profile will indicate whether the fishery is regularly interacting with the seabed.
F2.1 – There is no evidence to support the statement "*Such a strategy is not required for the specific fishery under assessment here, as due to the gear type used it fundamentally does not pose such a risk*". The question is whether the generic rules applied by overarching frameworks is considered a 'strategy', given the scale of the fishery and interaction with seabed.
F2.2 – what evidence was reviewed? Species distribution, fishing effort or habitat maps could be reviewed to support scoring here.
F2.3 – "*The pelagic gears used in the Danish component of the sandeel fishery are considered unlikely to interact with seabed habitats*", considered unlikely by who? Management measures are likely to support a pass, but statements should be accurate and backed by evidence.

F3.2 – There is substantial evidence that the sandeel fishery does impact marine ecosystems. The UK fishery was closed over concerns about the impact that poor stock status was having on the ecosystem. A stronger justification is needed to support a finding that it doesn't have a 'significant negative impact.
F3.3 – Natural mortality would be considered in any stock assessment. What additional precautions do ICES take in the benchmarking report? And why is it needed? Of note is the updated multispecies modelling, which contributes to the Sandeel stock assessment - Working Group on Multispecies Assessment Methods (WGSAM)

Follow-up comments –
F1.1 - I don't see this as a reason not to score those national components as the MT certificate and 'whole fishery assessment' imply the factory could source from the whole fishery, irrespective of which flag the vessel sails under, and I doubt any factory audit checks what flag the vessels landing at the factory sail under. A sentence confirming UK/Norwegian, etc., data that contributes to the WGBYC would suffice.

F2 – The scoring rationale compared to the initial report and first surveillance is nearly identical, substituting 'pelagic' for 'midwater' and 'does not interact' with 'is not intended to interact'. Other than the technology fact sheet, no evidence is provided to support the updated scoring rationale. Furthermore, it's concerning to read "*The nature of the MT process means that fishery assessors do not confirm that the gear listed on the application is the one used to catch the processed fish*" – surely to answer F2.2, at least, there has to be some confirmation by the fishery auditor on the types of gear used to target the species under assessment?
I have looked for records of interactions between the midwater otter trawl fleet and the seabed, either by concerned NGO groups or scientific papers. However, I could not find any evidence of such interactions. The F2 scoring would likely be met, but the current evidence and scoring rationales seem very generic, and I agree with the auditor that the potential for seabed interactions should be examined more closely. If the fishery is using bottom trawl, F2 wouldn't be met under the current justifications…

F3.2 – I have reviewed the initial report and the first surveillance, but there is no mention of the UK EEZ closure and the driver of this closure – ecosystem services. This constitutes a change in the evidence base from the initial assessment and growing concern over the fisheries' impacts on ecosystem function. This probably should have been addressed in the 2024 surveillance.
https://files.pca-cpa.org/pcadocs/2024-45/2.%20The%20European%20Union's%20Written%20Submission%20-%20Exhibits/Exhibit%20C-0050.pdf
https://www.gov.uk/government/publications/evidence-report-on-the-ecosystem-impacts-from-industrial-sandeel-fishing

The scoring rationales should have been updated with the new information, in addition, the initial assessment concludes that the fishery only impacts birds, and predator needs are considered in the stock assessment, that

the it doesn't raise to the level of 'wide spread disruption' – yet, if the fishery is interacting with the seabed, this may impact the socring outcome for F3.2.

https://www.researchgate.net/profile/Silvia-Opitz/publication/337029657_How_does_sandeel_fishery_impact_the_marine_ecosystem_in_the_southern_North_Sea_and_the_achievement_of_the_conservation_objectives_of_the_marine_protected_areas_in_the_German_EEZ_of_the_North_Sea/links/5dc1856ea6fdcc2128081d0c/How-does-sandeel-fishery-impact-the-marine-ecosystem-in-the-southern-North-Sea-and-the-achievement-of-the-conservation-objectives-of-the-marine-protected-areas-in-the-German-EEZ-of-the-North-Sea.pdf
^^ coincidentally this says "< 0,1 % of Danish sandeel catches are taken with PTM" Pelagic pair trawl (PTM) which was available at the initial assessment.

Certification body response

F1 – F1.1 : Here and elsewhere the surveillance is written under the assumption that the Danish facilities are sourcing only from Danish vessels. This has been true in the past but I appreciate that it has not necessarily been confirmed for this assessment cycle.

F2 : The gear type changed between the initial and first surveillance, so these comments apply to the previous surveillance report (although I do think they are still valid). In the previous surveillance (which I also carried out) the gear type was treated as a relatively minor change, based on the information in the reference for this section; i.e. that it is still a gear type which is essentially pelagic and not intended to make contact with the seabed. In retrospect I tend to agree that this was perhaps too light a touch, and that the potential for seabed interactions should be examined a bit closer.

"it's unlikely this is just a Mid-water trawl fishery "-The nature of the MT process means that fishery assessors do not confirm that the gear listed on the application is the one used to catch the processed fish, as there is no site visit. To some extent it is the responsibility of the factory auditor, but I'm not sure how effective this is in practice.

F3.2 - There is some additional evidence provided in the initial assessment; as noted, this surveillance is really looking for any changes. However, more information from the initial report could easily be added.
The V2 MT fishery assessment has always been relatively light-touch on Further Impacts, and I think this sandeel assessment is fairly representative of the level of analysis and also follows the scoring precedents set in other reports. However I don't disagree with the PR that there isn't a huge amount of detail, and perhaps these comments will be useful in establishing the precedents for V3 assessments, which I believe intend the assessor to consider these areas in more detail.

Optional: General comments on the Peer Review Draft Report

No further comments.

Certification body response

A comment which relates to several points in the PR feedback: the reviewed report was a surveillance assessment. There is still some uncertainty for assessors regarding exactly how to present surveillance reports, and I appreciate that this uncertainty also applies to peer reviewers. My personal approach to surveillance assessments is to fully re-write sections which have changed (primarily the Cat A-D sections), but where there have been no significant changes I provide a summary of the initial assessment and do not attempt to fully re-justify the scoring (i.e. I assume that "It passed previously and nothing has changed" is sufficient). I believe this is also the approach used in other standards – e.g. MSC surveillance assessments. Other MT assessors approach surveillances in different ways, from transposing all of the information from the initial assessment, to re-writing the entire report.

In short, I agree with the PR that some of the sections of the WF04 surveillance do not, by themselves, provide sufficient justification for the Pass rating, for the reasons described above. My understanding is that my approach is ok, but I would be happy to provide more detail in surveillance assessments if that becomes formal policy.

Glossary

Non-target: Species for which the gear is not specifically set, although they may have immediate commercial value and be a desirable component of the catch. OECD (1996), Synthesis report for the study on the economic aspects of the management of marine living resources. AGR/FI(96)12

Target: In the context of fishery certification, the target catch is the catch of stock under consideration by the unit of certification – i.e. the fish that are being assessed for certification and ecolabelling. (GSSI)