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European Commission
Directorate General Fisheries
Att. Mr. J. Holmquist
Rue de la Loi 200
B 1049 Brussels
Belgium

Date: 1st August 2006
Our reference: PRAC06.16/IH
Subject: Pelagic RAC position on management plan herring VIa North

Dear Mr. Holmquist,

The Pelagic RAC welcomes the draft long-term Management Plan for the stock of herring west of Scotland (VIa North) drafted 20/06/2006. We agree with the basis and scope for the plan. However, the Pelagic RAC wishes to make a few comments.

Harvest Rule

The Pelagic RAC agrees with the proposed values for trigger points. We do, however, recommend that it is defined for which year the trigger points apply, and propose that the projection year is chosen.

The Pelagic RAC expresses concern over the intention to include clause 2e. The assessment of this stock depends heavily on the annual acoustic survey. This type of survey can be technically difficult and it would not be right for the TAC to be automatically reduced by 10% in the event that a scientific forecast is unavailable due to technical problems with the survey.

In point 3, the Pelagic RAC proposes to put ICES and STECF on equal terms, i.e. to change the wording from: "STECF" to "ICES and STECF".

Quota Flexibility

The Pelagic RAC supports the introduction of an inter-annual flexibility of up to 10% on national quotas.

West of Scotland Closure

The Pelagic RAC strongly supports the removal of the closure of this area.

Control and inspection measures

The Pelagic RAC agrees with the intention of minimizing misreporting. Also, bearing in mind the present situation regarding North Sea Herring, the Pelagic RAC agrees that special measures should apply. Hence, under the condition that the West of Scotland Closure is removed, the Pelagic RAC agrees with the proposed specific control and inspection measures.

Yours sincerely,

i/o

Iain MacSween
Chairman Pelagic RAC

c.c.: Mr Ken Patterson, Mr John Farnell, Ms Chiara Gariazzo, Mr Poul Degnbol, Ms Miriam Garcia-Ferrer