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Date: 22 October 2010  
Our reference: 1011PRAC26/AC  
Subject: In-year revision of North Sea herring TAC for 2010  
CC: Commissioner Damanaki, Ms Carmen Fraga, Ms Isabelle Viallon  
(by e-mail)

Dear Ms Evans,

The Pelagic RAC would like to respond to your letter of 19 October, in which you elaborate on the Commission's views on the North Sea herring stock and on the application of the LTM plan. The Pelagic RAC is very disappointed about this negative response and the way that the Commission is approaching the Pelagic RAC's proposed in-year revision request. The Pelagic RAC believes that the Commission makes grave mistakes in its reasoning and is not focussing on the most important principles in the LTM plan that it claims to defend, namely setting a suitable fishing mortality.

The Pelagic RAC emphasises that, *it is not arguing to abandon the LTM plan*, but rather *use the management plan this year to decrease the discrepancy* between the desired and current situation of the fishery. It is clear from the STECF report that also scientists deem the Pelagic RAC's proposal to be within the limits of the LTM plan:

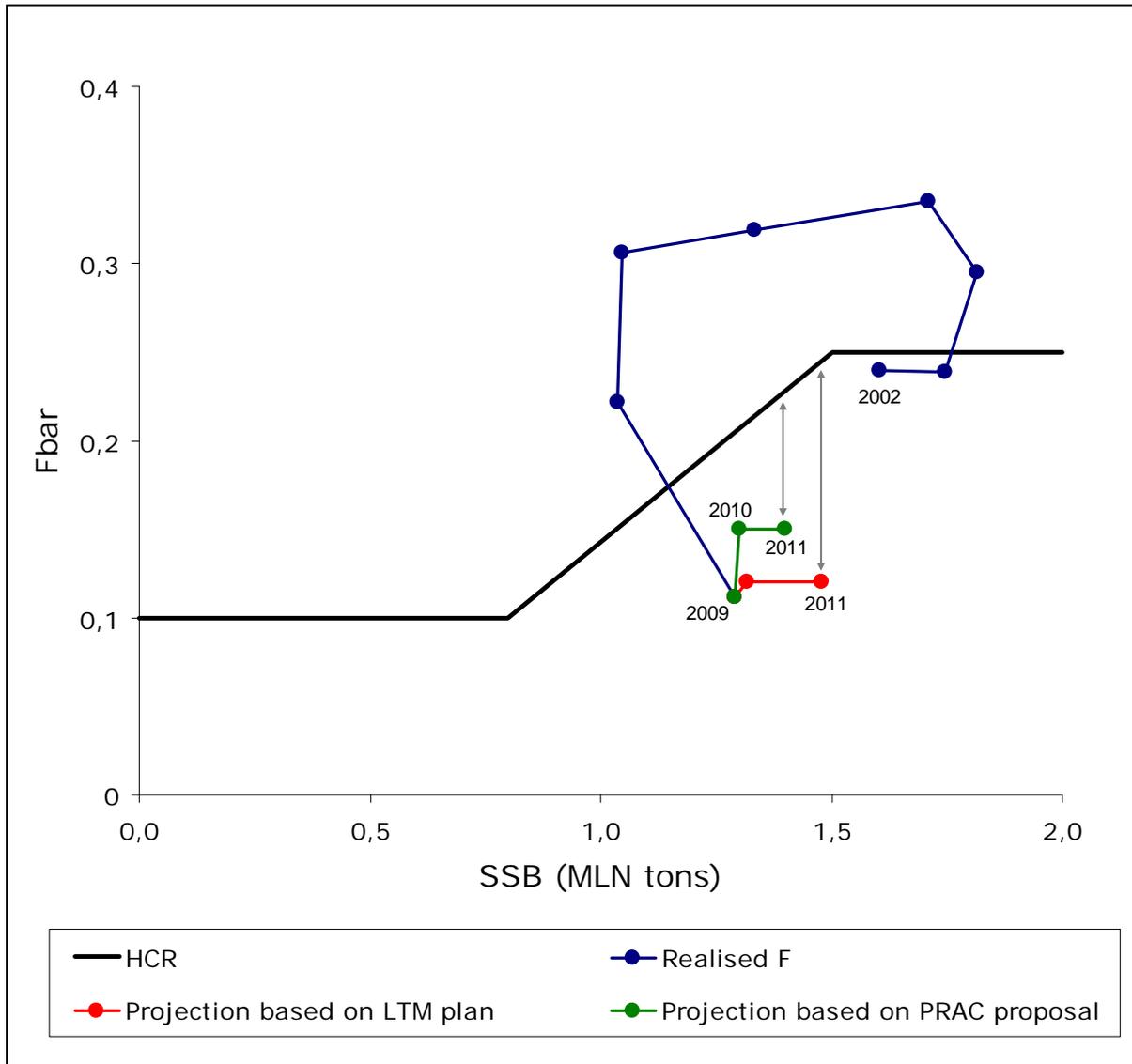
*"Using the 2010 assessment of the spawning stock size in the HCR would imply that the TAC for fleet A should reflect a fishing mortality of 0.20 (age 2 to 6), resulting in catches by fleet A of 262,000 t in 2010. This represents an increase in the TAC from 2009 to 2010 by more than 15% and the 2010 TAC for fleet A should be limited to 196,650 t. [...] STECF advises that if the TAC for 2010 is revised as outlined above **and following the agreed management plan between EU and Norway**, the 2011 TAC for the A fleet should be 226,148 t (15 % increase)."*

In contrast to the picture that was painted by the Commission in its letter, regarding likely negative developments for this stock in the upcoming few years, the Pelagic RAC does not understand what the Commission is basing this on? The ICES advice catch options table very clearly points out that unless extreme increases in the TAC<sup>1</sup> for 2011 are realised, substantial *increases rather than decreases in SSB* can be expected, at least in the next two years. The Pelagic RAC wants to remind the Commission that the LTM plan was amended in 2008, in order to adjust to the new 'regime' of low recruitment levels. Current assessments *and* projections by ICES are thus already taking the recent low recruitment levels into account, which is why the Pelagic RAC cannot think of any good reason for the Commission to expect a fall in the level of SSB in the short term.

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<sup>1</sup> E.g. 126% increase based on the MSY principle, which the Pelagic RAC is not even arguing for

In order to make absolutely clear what it is that the Pelagic RAC is proposing and what the implications are for the stock *and* the application of the LTM plan of this proposal, we have visualised it in the figure below, in the familiar graph from the ICES advice.



The blue line describes the fishing mortality (F) as it has been realised over the past 8 years. As you can see, F has been reduced each year since 2005. In 2009, as this year's assessment showed, F reached an all-time low of 0,11 since the beginning of the time series of the assessment of this stock which started in 1960 (the only exception being in 1978 and 1979 when the fishery was closed).

The black line depicts the LTM plan's HCR. The red line shows a projection of the currently set 2010 TAC and the 2011 TAC based on the LTM plan, which clearly allows the gap between the realised F and the target F as described by the HCR to grow larger (right grey arrow). A projection of the proposal by the Pelagic RAC (green line) shows that the gap would become somewhat smaller (left grey arrow).

In short, it is the view of the Pelagic RAC that its proposal is sustainable and sensible, because it avoids the discrepancy between the current situation and the preferred situation to grow bigger, and instead makes a correction to the undesirable situation that the fishery is currently in.

The Pelagic RAC is disheartened by the fact that it made a considerable effort to prepare a sensible, science based, unanimous recommendation, which is being rejected all too easily by the Commission without, in our opinion, having good reasons for doing so. The Pelagic RAC is still hopeful though, that with this additional argumentation, you are willing to reconsider your position.

Looking forward to your response,

Yours sincerely,



Ms Aukje Coers  
Pelagic RAC secretariat