



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES
THE DIRECTOR-GENERAL

Brussels, 19 OCT. 2010
D(2010)717062

Mr Ian McSween
Pelagic RAC
Treubstraat 17
2280 AB Rijswijk
The Netherlands

Subject **New information on the North Sea herring stock.**

Dear Mr McSween,

Thank you for your letter of 20 August 2010 concerning the Pelagic RAC's request for an in-year revision of the TAC for North Sea herring in the light of the latest ICES advice on the state of the stock.

After long and careful consideration of this issue, I am sorry to have to inform you that the Commission will not be proposing a revision of the TAC for 2010.

The herring TAC is fixed in accordance with the long term management plan agreed between the EU and Norway. One of the objectives of the plan is to provide stability in the catches by applying TAC constraints, rather than tracking annual fluctuations in advice. This principle is undermined if we retrospectively apply the latest estimates of stock size in order to revise the TAC in the current year. Moreover such a practice would alter the nature of the long-term plan, and would not guarantee remaining coherent with the precautionary approach.

A further consideration is that there has been low recruitment in the North Sea herring stock for the last 8 years. Unless this changes we can expect the stock to decline over the next few years. The ICES advice explicitly raises this point, stating:

"The 2009 year class is estimated to be within the range of recent low recruitment. Therefore ICES assumes that the recruitment will remain at the lower level. The management plan has proved to be an effective tool for maintaining exploitation and conserving the North Sea herring stock. Thus the management plan should be followed and the TAC adhered to." Sticking to the management plan will provide a smoother transition to lower TACs if recruitment levels do not improve

Revising the 2010 TAC, and effectively increasing the TAC for 2011 by about 35% compared to the existing 2010 TAC, is likely to mean that we will very soon be in a situation where we have to decrease the catches again. Sticking to the management plan will provide a smoother transition to lower TACs if recruitment levels do not improve.

I understand that this decision will disappoint many in the industry, and may be interpreted as reluctance on the part of the Commission to increase the TAC when the scientific advice suggests it is possible. However, I would like to assure you that the Commission takes a consistent approach when it comes to applying management plans. We do not intend to propose a mid-year increase of the herring TAC on the basis of the increased estimate of stock size, but nor would we have advised a mid-year decrease had the revised estimate of the stock shown to be smaller than previously thought. The rules of the long-term management plan are designed to cater for both situations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lowri Evans', written in a cursive style.

Lowri Evans