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Date: 14 November 2011  
Our reference: 1112PRAC20/AC  
Subject: Fishing opportunities 2012 North Sea herring  
CC: Sabela Perez-Maiz, John Spencer (by e-mail)

Dear Ms Evans,

At the latest Pelagic RAC Working Groups meeting on 6 October 2011, the Pelagic RAC discussed the ICES advice for fishing opportunities in 2012 for several herring stocks and widely distributed pelagic stocks and came to agreement on a number of recommendations which were supported by the industry as well as the environmental NGOs. No recommendation on North Sea herring was agreed upon yet, because EU and Norway were in the process of sending a request to ICES for advice on applying different options on stabilizing mechanisms in the LTMP.

ICES recently gave its advice and the PRAC would now like to take the opportunity to comment on the possible adaptations of the stabilising mechanism in the LTM plan. In addition, the Pelagic Freezer-trawler Association tasked a scientist at IMARES to conduct simulations for two additional options, which provide solutions for moving towards MSY within a time frame intermediate between the ICES options 2,3 and 5 on the one hand and option 4 on the other. All simulations were conducted under the assumption that the current (low) recruitment regime continues. Please find the report by IMARES annexed to this recommendation for your information and consideration. This recommendation letter was unanimously agreed upon by the Executive Committee through written procedure.

#### The HCR options evaluated by ICES/IMARES

The ICES workshop WKHIAMP produced simulation results for five different HCR options and consecutively focussed on four indicators to measure their performance. IMARES used the exact same methodology and indicators for the evaluation of the 6<sup>th</sup> and 7<sup>th</sup> option as ICES did during WKHIAMP. All options were evaluated in conformity with the Precautionary Approach, since the risk of SSB falling below  $B_{LIM}$  is less than 5 % in all options. In terms of the three performance indicators, a trade-off becomes apparent between yield and stability and the different options each perform in a different way (see the table on the next page).

ICES concludes that *"the current HCR rule, with the 15% constraint, stands out as it allows only a slow increase in TAC from the low in 2011. It gives a similar or better stability than the other options, but it does that at the expense of a lower average yield, even in the medium term. The remaining tested rules are similar in respect to average yields in the medium term, but differ with respect to stability"*. The Pelagic RAC agrees with this analysis.

HCR option	Risk (%)	SSB in 2020 (kt)	TAC in 2012	Mean catch A-fleet (kt)	Mean IAV (%)
1. Current HCR	0	1 500	230	346	11.8
2. Current HCR without constraint	0	1 415	474	365	22.8
3. 0.2 – 0.3 HCR	0	1 392	474	367	18.1
4. 50-50 HCR	0	1 384	337	364	12.5
5. Current HCR without constraint in 2012	1	1 414	474	365	16.8
6. 25-75 HCR (2012-2013) / 50-50 HCR from 2014 onwards	0	1 387	405	366	12.7
7. Current HCR without constraint in 2012 / 50-50 HCR from 2013 onwards	0	1 392	474	367	14.2

### Amendment of the LTM plan

Based on these results, the Pelagic RAC in the first place considers that these results clearly show that continuing to set TACs based on the currently agreed LTM plan significantly and unnecessarily disadvantages the pelagic industry in the next 10 years considering that there are other precautionary options providing substantially higher yield in the short as well as the medium term. Therefore the Pelagic RAC recommends that the EU with Norway will seek an amendment to the current LTM plan.

Of the remaining six HCR options, the Pelagic RAC considers that further exploration of approaches with – amongst others – a stabilising mechanism such as used in options 4, 6 and 7 would be worthwhile. They show that different stabilising mechanisms can be incorporated in the LTM plan, whereby the stock is expected to perform well (with the SSB stabilising just above  $B_{PA}$ ) and a better compromise can be reached in the trade-off between high and stable yield. The Pelagic RAC therefore recommends that ICES is requested to perform a full Management Strategy Evaluation of the LTM plan which incorporates such – as well as other – stabilising mechanisms, after the benchmark assessment in February 2012 (e.g. using a long term evaluation time frame and testing the HCR for robustness under different starting conditions) and doing it in a collaborative iterative process between scientists, managers and stakeholders.

### Short term TAC setting

In the mean time, since the evaluations by ICES and IMARES show that any TAC for 2012 up to 478.000 tons is precautionary in the medium term (10 years), the Pelagic RAC recommends to set a TAC that enables a quick transition to MSY.

If you have any questions, please do not hesitate to contact the secretariat. Looking forward to your response,

Yours sincerely,



Ms Aukje Coers  
Pelagic RAC secretariat