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Date: 13 November 2014  
Our reference: 1415PAC22  
Subject: Herring benchmark 2015 (WKWEST)  
CC: Richard Nash (by email)

Dear Mr Degnbol,

The Pelagic AC would like to thank you for the invitation to contribute and be involved in the upcoming ICES benchmarks in 2015 including the preparatory work. As you are well aware the Pelagic AC has an interest in the following three herring stocks which will all be benchmarked in a few months from now:

- Herring in Divisions VIIa (South of 52°30'N) and VIIg, h, j, k (Celtic Sea and South of Ireland)
- Herring in Divisions VIa (South) and VIIb,c
- Herring in Division VIa (North)

With this letter the Pelagic AC would like to raise a number of issues that it considers should be addressed with priority at the benchmark.

**General issues of all three herring stocks**

There are a number of general issues relating to all three herring stocks that the Pelagic AC considers are very relevant to be discussed during the benchmark process. These are:

1. The appropriateness and timing of the hearing acoustic surveys.
2. Stock components identities.
3. Development of robust recruitment indices.
4. The appropriateness of the limit reference points.
5. Incorporation of industry information into the assessments.
6. The contribution of seal predation to total herring mortality. ICES has identified that this may be significant, but data are limited and, the impact on the stock cannot be estimated accurately.



## Herring VIa North

The undefined reference points for herring in Division VIa (North) should receive the highest attention in order to derive values for all currently missing reference points. Clearly defining all reference points is a prerequisite for obtaining MSC certification. The transboundary issue as highlighted below in relation to herring VIaS and VIIbc could have an effect on defining these reference points.

## Herring VIa (south), VIIbc

A major issues for the Pelagic AC over the last number of years is the herring stock in Divisions VIa (South) and VIIb,c. The Pelagic AC and the Irish fishing industry have invested both financial and other resources to develop a rebuilding plan for this stock. After several revisions STECF and ICES have concluded that this plan can rebuild the stock only if transboundary catches are eliminated. ICES States under its "Management Considerations" in this year's advice that:

*"Transboundary catches are likely to continue because the stock is not restricted to the TAC area, especially during the summer and autumn. This stock is expected to be caught in fisheries across the Malin Shelf. ICES welcomes the efforts of the Pelagic RAC and the Irish industry in the development of the proposed rebuilding plan. The plan implies a very low catch, only slightly above 0 t. Rebuilding will not be possible if transboundary catches are not eliminated (STECF, 2013). Given that the stock is not confined to the TAC area, outtake from the stock is not regulated by the TAC. Therefore, measures to reduce transboundary catch are required."*

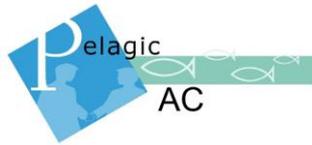
This is a key issue that should be fully addressed during the benchmark process.

Another important issue in relation to this herring stock is the setting of a TAC. ICES has concluded that outtake from the stock is not regulated by the TAC. In order to try to address this the Pelagic AC has proposed a closed area in neighbouring Division VIaN, north to 57°30 N, and outside the UK 6 mile limits. However ICES has concluded that:

*"Further work is required to evaluate if this closed area will be effective. Preliminary analyses suggest that Divisions VIaS and VIIb,c herring are present in Division VIaN beyond the limits of the proposed exclusion zone. These results also show that Division VIaN herring are present to a somewhat lesser extent in Division VIaS. Therefore the proposed exclusion zone would not be expected to eliminate the exploitation of Divisions VIaS and VIIbc fish in Division VIaN."*

The appropriateness or otherwise setting of a TAC for this management area in isolation or combined with another area and the extent and effectiveness of a closed area are important issues to be considered during the benchmark process.

Finally the Pelagic AC noticed that the ICES advice for this stock published in June 2014 reads that *"this stock is heavily influenced by environmental factors, and its current low productivity is partly associated with unfavourable oceanographic conditions. The warm winter temperatures and stormy conditions that have been predominant in recent years are not favourable for herring in this area."* Unfortunately ICES does not present any form of scientific evidence in the advice, e.g. references to studies published in peer-reviewed scientific journals, which underline these claims. Therefore the Pelagic AC would like to



encourage a literature review as part of the benchmark providing a summary of relevant scientific findings and possibly guidelines on how such environmental factors can be taken into account when formulating successful management strategies.

The Pelagic AC would like to confirm the active participation of several of its stakeholders in the benchmark process and its willingness to closely work together with ICES on the issues mentioned above and to provide qualitative industry information similar to the information provided in the ICES advice.

Yours sincerely,

A handwritten signature in black ink that reads 'Sean O'Donoghue'.

Sean O'Donoghue  
Chairman Working Group II

