

**Mr Joao AGUIAR MACHADO**

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Date: 23 April 2019  
Our reference: 1819/PAC17  
Subject: Request ICES guidelines for rebuilding plans and follow-up 6a herring recovery plan

Dear Mr. Aguiar Machado,

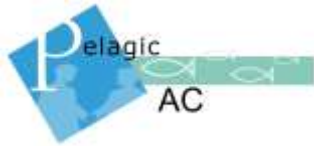
The Pelagic Advisory Council (AC) would like to raise an important issue with the Commission in light of the revised 6a herring rebuilding plan that has been submitted for evaluation by ICES in March 2018.

Over the past two years, the Pelagic AC has worked on the development of a rebuilding plan for 6a, 7b,c herring. The purpose of this recovery plan is to ensure the stock can be rebuilt whilst providing for sampling opportunities to improve the knowledge base for this stock. This development was initiated by the Pelagic AC following ICES advice from 2016.

The first rebuilding plan was submitted to the Commission in May 2017 (reference 1617/PAC 95) with a request to have it reviewed by ICES. ICES presented its advice on the rebuilding plan on 24 November 2017 with suggestions to have the rebuilding plan modified on certain issues. In March 2018, a revised rebuilding plan was submitted (reference 1718/PAC 108) which addressed the revision points that were pointed out by ICES in the first plan.

The Herring Assessment Working Group (HAWG) subsequently evaluated the plan and concluded that “the revised plan had successfully addressed the shortfalls identified in the ICES advice from November 2017 and found that the revised plan was consistent with the ICES MSY advice rule and even more conservative in parts (decreasing F as the stock rebuilds).” The final decision taken by ACOM, however, overruled the conclusions from the HAWG by concluding the plan could not be evaluated because of an apparent lack of resources.





It comes as no surprise that the Pelagic AC was very disappointed by this final decision as well as in the standstill in the rebuilding plan status that has resulted ever since.

In order for the Pelagic AC to remain productive in its work, it would be very useful if ICES could provide guidance in the form of specific criteria based on which ICES evaluates whether a rebuilding plan is precautionary or not. In addition, clarity as to the basis for such criteria would be appreciated. The Pelagic AC has brought this request forward to ICES during the annual MIACO meeting in January 2019, to which ICES admitted that such criteria have not yet been developed.

In light of this response, the Pelagic AC is concerned over the replication of the above described process in the future, bearing in mind ongoing developments with other management/rebuilding plans (such as Western horse mackerel and Celtic Sea herring) we are currently involved in. The development of multi-annual management plans and/or rebuilding plans remains a corner stone of the work of the Pelagic AC and such guidelines would be an important step forward to secure its continuation.

We would be grateful if the Commission, as the recipient of ICES advice, could raise this need formally with ICES as a matter of urgency. We would also be very grateful if the Commission could assist the Pelagic AC in resolving the lengthy standstill of the 6a herring rebuilding plan by following-up on this plan with ICES.

Thanking you in advance for your consideration of the above. Looking forward to your response,

Kind regards,

A handwritten signature in blue ink that reads 'Jesper Raakjær'.

Jesper Raakjær  
Chairman Pelagic AC

