



**Ms. Charlina Vitcheva**

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Date : 1 March 2021  
Our reference : 2021PAC17  
Subject : Stakeholder Information in ICES Advice

Dear Ms. Charlina Vitcheva,

During the annual MIAC/O meetings between ICES and Advisory Councils held on 14 January 2021, ICES notified the ACs of its decision to remove the “Stakeholder Information” section in ICES advice sheets moving forward. This decision has taken the Pelagic Advisory Council (PelAC) by surprise, and we would like bring to your attention our concerns about this issue.

According to ICES, the decision was made in light of a more fundamental discussion within ACOM on how stakeholder information feeds into ICES advice. Currently, there is no effective mechanism for introducing either stakeholder information or stakeholder concerns into the ICES advice system. The “stakeholder information” section in ICES advice sheets has been in place for years, and offers stakeholders an opportunity to informally reflect perceptions of the situation at sea.

ICES has touched upon this discussion with stakeholders during the Workshop for a Research Roadmap for Mackerel (WKRRMAC) held in May 2019<sup>1</sup>. During the workshop it was “recognised that there was a trade-off when considering the independence of advice from managers and stakeholders, and the responsiveness to stakeholder concerns”. There was however, broad agreement on “the need of a mechanism to reflect divergent perceptions”, and “greater industry-science partnerships were seen as important approaches to improving the evidence base for mackerel research”. This resulted in the following key recommendation from the workshop:

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<sup>1</sup> Source: Report WKRRMAC workshop May 2019 Bremerhaven. Link [WKRRMAC Report 2019.pdf](#)

*“6. Build mechanisms to incorporate industry sampling of biological information into the formal stock assessment process and develop approaches for formalising the flow of information of industry perceptions of the state of the stock into the assessment process.”*

As well as the following priority for future research:

*“8. Develop pragmatic approaches for formalising the flow of information of industry perceptions of the state of the stock and the fishery into the assessment process. (Action: ICES and fishing industry scientists).”*

However, neither one of these outcomes is mentioned in the current MoU between ICES and DGMARE. In light of the above, and especially when considering the series of issues that arose in important assessments such as the NEA mackerel in 2018, the PelAC is surprised by ICES’s decision to move away from the existing stakeholder information section entirely, without introducing an appropriate substitute mechanism. In the case of mackerel, stakeholders’ views have proven to be especially important in flagging issues in the assessment. In the end, these views were more reflective of the realities at sea than the assessment results in question. In our view, it would therefore be a retrograde step to remove this signal from the advice sheets at this stage, when no other mechanism for incorporating this information is in place.

We recognise ICES’s reservations with regards to the trade-off between stakeholder input and credibility of science, and as PelAC we offer our full engagement and cooperation towards developing a robust formal procedure for incorporating information flow from stakeholders in a systematic fashion into the ICES advice system. To facilitate this process, we request the Commission to formally include this as an objective in its MoU with ICES, and also ask that the PelAC be actively consulted during this process by ICES. While this procedure is being developed, we move that stakeholder information should be maintained as a standing item within advice, and we would greatly appreciate it if the Commission could convey this pressing message to ICES.

Yours sincerely,



Jesper Raakjaer  
Pelagic AC Chairman