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European Commission
Directorate General Fisheries
Att. Mr. Jörgen Holmquist
Rue de la Loi 200
B 1049 Brussels
Belgium

Date: 11 October 2006
Our reference: PRAC06.26/IH
Subject: Recommendations herring advice

Dear Mr. Holmquist

As a result of a number of meetings that the Pelagic RAC has held over the past months, we would like to present recommendations that concern various herring stocks, including North Sea herring, various other pelagic species and MSY. We would like to ask you to take our viewpoints into consideration at the upcoming negotiations with third countries and in the establishment of the TACs for 2007.

In accordance with article 18 of the articles of association of the Pelagic RAC, a copy of this letter has been sent to the Member States concerned and to the Advisory Committee on Fisheries and Aquaculture.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ingvild Harkes', with a long, sweeping underline.

Dr Ingvild Harkes

Secretariat Pelagic RAC

c.c. Mr Kenneth Patterson, Mr Emmanouil Papaioannou, Mr Poul Degnbol, Ms Miriam Garcia-Ferrer.

Pelagic RAC Recommendations, September 2006

Questions on scientific methods of the herring fishery in VIIId and IVc

Recommendation:

- The RAC is willing to discuss with the Commission if and how scientific surveys can be improved.

Herring Celtic Sea and Div VIIj

Recommendation:

- The Commission is asked to request STECF to review the stock and draft a rebuilding plan. The timing should be so that the plan can be assessed by ICES, and be commented on by the Pelagic RAC before implementation on 1 Jan 1007.

Herring Div VIa north (west of Scotland)

Recommendations:

- The TAC should be set at 34 000 tonnes.
- The Management Plan should be adopted and implemented, with the following comments:

Harvest Rule

The trigger points are accepted. The RAC, however, recommends that it is defined for which year the trigger points apply, and propose that the projection year is chosen.

The RAC is concerned over the intention to include clause 2e. The assessment of this stock depends heavily on the annual acoustic survey. This type of survey can be technically difficult and it would not be right for the TAC to be automatically reduced by 10% in the event that a scientific forecast is unavailable due to technical problems with the survey.

In point 3, the RAC proposes to put ICES and STECF on equal terms, i.e. to change the wording from: "STECF" to "ICES and STECF".

Quota Flexibility

The introduction of an inter-annual flexibility of up to 10% on national quotas is supported.

West of Scotland Closure

The removal of the closure of this area is strongly supported.

Control and inspection measures

The RAC agrees with the intention of minimizing misreporting. Also, bearing in mind the present situation regarding North Sea Herring, the RAC agrees that special measures should apply. Hence, under the condition that the west of Scotland Closure is removed, the RAC agrees with the proposed specific control and inspection measures.

Herring subarea IV Div VIIId and IIIa autumn spawners

Recommendations:

- Sufficient effort and resources need to be invested immediately to clarify the causes of the poor survival rate for larvae.
- The RAC recommends to the Commission and member states that every effort is made to protect the juvenile herring.
- In the light of the uncertainties in the scientific advice the majority¹ of RAC members support the setting of the 2007 NS herring TAC at a level 20-25% below the 2006 TAC of 455,000 tonnes. This is on the basis that:
 1. The ICES paper on additional stock projections dated 7 September 2006 gives several new catch options. The final option on page 3 shows the projected effect that a 15% reduction in TAC in each of the next 4 years would have on SSB. Under this scenario the estimated SSB never falls below 1mt, while a larger reduction in the range 20-25% keeps SSB above 1.1mt, which is well above B_{lim} and maintains a healthy stock size when recruitment is plotted over a 40-year time line.
 2. The present recruitment difficulties may well be caused by the so-called "Large Stock Syndrome". A number of scientists have suggested that this hypothesis is worth further consideration. Following this thinking, a massive cut in the 2007 TAC might well exacerbate the recruitment problem rather than solve it.
 3. The Community has introduced enhanced control and enforcement measures which will significantly reduce the possibility of over quota landings from 2006 onwards. In addition, the introduction of the industry supported VIaN herring management plan in 2007 will address misreporting concerns.
 4. There is significant scientific uncertainty surrounding the reasons behind recruitment difficulties and also what represents realistic stock reference points. A cut of 47% will have a detrimental effect on those dependent on the fishing industry, while a cut of 20-25% is manageable. A responsible management decision must be taken and a reduction of 20-25% would strike a balance between protecting the condition of the stock and limiting the socio-economic impact.
- The minority² of RAC members support the setting of the 2007 NS herring TAC at 300,000 tonnes corresponding to a 35% reduction on 2006 according to scenario 3 in the table of options in the 2006 ICES advice. This is on the basis that:
 1. The precautionary principle requires maintaining stock levels above B_{pa} and F at the agreed level.
 2. By choosing a 35% reduction, F will be kept at the level as agreed in the management plan. The stocks are foreseen to drop slightly below B_{pa} in the first year, but will recover to above B_{pa} in 2008.
 3. Before the "Large Stock Syndrome" hypothesis is used as a basis for management decisions, it needs to be validated by ICES.
 4. It is assumed that the pelagic industry is able to manage the socio-economic impacts that result from a TAC reduction of 35%.

¹ All members with the exception of those listed at 2 below.

² Members from Seas at Risk/ North Sea Foundation and WWF.

Irish Sea Herring

Recommendation:

- The advice is adopted without comment.

Herring Div VIa south and VIbc

Recommendations:

- The RAC urges the Commission to request STECF to draft a management plan that meets the advice from ACFM.
- The plan should be assessed by ICES and be commented on by the RAC before implementation on 1 Jan 2007.

Herring subdiv 22-24 and Div IIIa spring spawners

Recommendations:

- The RAC requests that the presentation of the advice from ACFM be two-dimensional: the stock being one, and the management areas the other.
- The RAC recommends that the model used when forecasting catches in area IIIa be reviewed.

Mackerel

Recommendation:

- Adequate funding should be made available to ensure that the 2007 egg survey geographical coverage is at the same level as previous surveys.

Sprat

Recommendations:

- The RAC recommends that the Commission revise the TAC downwards compared to 2005 because of the bycatch of herring.

Blue Whiting

Recommendation:

- The RAC requests the Commission to instruct STECF to draft a research proposal for juvenile blue whiting.

Horse Mackerel

Recommendation:

- The RAC requests the reinstatement of funding for surveys.

MSY

- Before the Pelagic RAC can adopt MSY, it needs a socio-economic impact assessment for individual stocks and requests the Commission to provide this information.