

Ms Lowri Evans European Commission Directorate General - Mare Office J-99; 0/07 B-1049 BRUSSELS Belgium Pelagic RAC Treubstraat 17 PO Box 72 2280 AB Rijswijk The Netherlands

Tel: +31 (0)70 336 9624 Fax: +31 (0)70 399 3004 E-mail: info@pelagic-rac.org http://www.pelagic-rac.org

Date: Our reference: Subject: CC: 12 May 2011 1011PRAC95/AC Request to ICES/STECF to further evaluate LTM plan NS herring Ms Isabelle Viallon (by e-mail)

Dear Ms Evans,

On 17 January 2011 the EU and Norway requested ICES to evaluate the performance of the Long Term Management plan for North Sea herring in meeting its objectives: "to provide for sustainable fisheries with high and stable yields in conformity with the precautionary approach". On 3 May ICES published the ACOM endorsed response to this request with the following elaboration on request 1:

"The management plan appears to perform well in relation to the objectives of providing sustainable fisheries with stable yield in conformity with the precautionary approach. The management plan is also considered consistent with the MSY approach. In relation to the objectives of achieving high and stable yield, the change in the perception of the stock for 2010 is a type of situation that was not part of the evaluations so far. Only by testing the HCR within a Management Strategy Evaluation will it be possible to judge the implications of this kind of uncertainty on the trade-off between high and stable yield."

The Pelagic RAC has been closely involved in this evaluation (e.g. by participation in the ICES workshop WKHERMP on 14-15 March 2011). In response to the second part of the above quoted elaboration (in italic), the Pelagic RAC expects that due to the change in perception of the stock in 2010 such simulations would show that maximum yield is not being achieved at present, nor will it be in the short and medium term and possibly not in the long term either. The Pelagic RAC therefore urges the Commission to task ICES and/or STECF to carry out the suggested evaluation to determine whether the current management plan, in comparison to alternative HCRs (e.g. without 15% IAV constraint), performs optimally in maximising yield and thus economic return from the fishery. In line with ICES' recommendation the Pelagic RAC would favour a collaborative iterative process between scientists, managers and stakeholders.

Yours sincerely,

Ms Aukje Coers Pelagic RAC secretariat