



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

DIRECTOR GENERAL

Brussels,
DG MARE – C2/JL

M. Ian McSween
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Subject: PELRAC advice on herring stock fishing opportunities for 2011

Dear Mr MacSween,

Thank you for the Pelagic RAC's contribution analysing the scientific advice on herring stocks. I would like to give you feedback on how the Commission has prepared its proposal on fishing opportunities for 2011 (Atlantic).

North Sea herring

With regard to North Sea herring, I would like to refer you to our specific exchange of communication, in particular my letter of 19 October 2010 and your response of 22 October 2010.

The Commission remains of the view that retrospective changes to the TACs that had been set by management plans in the light of the latest scientific advice undermine the functioning of those plans. The plans are designed to provide inter-annual stability in catch limits, and to absorb annual fluctuations in the advice whether caused by real variations in stock dynamics or assessment variability. I would also repeat our concerns that the biomass of North Sea herring is estimated to be below, albeit close to, the precautionary level and that recruitment to the stock has generally been poor in recent years. Nevertheless, the Commission recognises that the plan is jointly agreed with Norway, which has a different interpretation of this aspect of its implementation. As you will no doubt be aware, we therefore agreed to a modest adjustment of the 2011 TAC level to take into account the exceptionally large change in the estimate of stock size in 2010, resulting in a proposed 22% increase rather than a 15% increase without such an adjustment.

Western Baltic herring

Thank you for your precise advice. At its October meeting the Council fixed a TAC of roughly 15.900 tonnes for the Western Baltic spring-spawning herring (WBSS) in subdivisions 22-24, representing a reduction by 30%. A 50-50 split of the stock between the Skagerrak and the 22-24 fishery was applied in recent years in the proposal. However, the Council did not maintain the 50-50 split in its 2009 decision, a fact that has made its political importance unclear. In addition, Norway used the lower reduction in the Western Baltic in the past as an argument not to accept a higher reduction in IIIa, a fact that resulted again and again in a lower total reduction than needed for the stock and is partly responsible for the dreadful situation the stock is in today.

This year the Commission decided to follow the STECF advice for a 30% reduction for all areas, as reflected by the approach taken for the Baltic Sea. This is intended to ensure that the overall management intention for this stock is achieved in 2011, and also to reflect an equal treatment of both areas.

As a result of this approach, Norway agreed to a TAC in IIIa of 30.000 tonnes for fleet C. This closely corresponds to the TAC that would result from adding the expected catch of the North Sea autumn spawning herring to the amount of the WBSS catches that would be available for fleet C, given what has already been fixed as a TAC in the Baltic. This is slightly lower than your calculation of 31.278 tonnes.

Celtic Sea herring

The Commission's proposal coincides with your advice.

Herring in VIa North

The Commission's proposal coincides with your advice.

Herring in VIa South

Although I accept that the Irish interest in this stock is more than predominant, the new rule for local stock management does not apply to it, as there is more than one Member State concerned. We will have to evaluate the overall reaction to this new approach of local management at the Council meeting of 13 and 14 December 2010.

The Commission's proposal, based on the stock falling into category 10, is a reduction of -50%. Current fishing mortality is unknown, but likely to be above F_{msy}. Stock status is unknown. Given the low recruitment it is not possible to identify any "non-zero" catch which would be compatible with the MSY transition scheme. The precautionary approach would not allow fishing unless there is a management plan in place. The Commission's proposal is based on this consideration while avoiding too drastic interannual TAC variations.

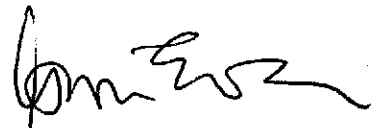
I acknowledge the pelagic RAC's tireless efforts to shed more light to the status of this stock, and I encourage you to go on this way. In this regard, we would also be interested in your opinion on the conclusions of the SGHERWAY project.

Irish Sea herring

On the Irish Sea herring, I do not share your conclusion. Although the stock is increasing in recent time, the Commission decided to propose an unchanged TAC, rather than an increase (4800t). Category 8 of our policy rules does not automatically lead to an increase. A rollover is compatible with the MSY transition projection from ICES. An increase in the TAC would be a move away from MSY advice and would therefore not be compatible with the EU commitments regarding MSY.

We are currently preparing for the December Council and hope to be able to find a solution that is both honouring the commitment of long-term sustainable management of the stock to ensure the long-term viability of the fishing industry.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lowri Evans', written in a cursive style.

Lowri Evans