

Ms Charlina Vitcheva

Director General
Directorate General Maritime Affairs and Fisheries
Rue de la Loi 200
1049 Brussels
BELGIUM

Date: 31 March 2025

PelAC reference: 2425PAC25

Subject: Access to Norwegian waters to fish Atlanto-Scandian herring

Dear Ms. Charlina Vitcheva,

The outcome of the 2024 and 2025 Coastal States consultations on Atlanto-Scandian herring (ASH) are very disappointing and frustrating for PelAC members. The move by Norway and the Faroes, backed by Russia to not recognise the EU as a Coastal State in these negotiations is particularly concerning, and, in our opinion unjustified.

Norway consistently emphasized the importance of cooperation and joint management in fisheries with the EU. However, the PelAC would strongly contend this has not been the case in recent years. As far back as 2007, the European fishing industry agreed to reduce its share of ASH to gain access to Norwegian waters to fish its quota. However, this seems to be ignored by Norway, and PelAC considers the offer of access made by Norway to catch only 1% of the EU quota in Norwegian waters as insulting given the high price the EU has paid historically for access.

The EU has a consistent and predictable track record in terms of quota setting and catches for this stock, with a genuine and traditional interest underlined by the fact that it regularly increases its quota through international swaps. As far as the PelAC is concerned, EU vessels have a legitimate right to the share it currently claims based on previous arrangements.

As with other pelagic stocks, such as mackerel and blue whiting, the PelAC stresses the zonal attachment argument used by Norway in the case of ASH should not be the criterion on which to base a sharing arrangement. Instead track records should be respected, with a view to providing continuity, stability and predictability. Data on geographical distribution is incomplete and inconsistent and therefore does not allow for clear conclusions to be drawn. The use of zonal attachment for ASH by other Parties is flawed and one-dimensional.





With this in mind the PelAC recommend the following:

1. The EU push at Coastal States and bilaterally with Norway for the restoring of access to Norwegian waters in line with the previous EU quota share. If Norway does not agree to access, then the EU should request Norway returns the quota share the EU used to pay for access in 2007, noting that such a transfer should not result in overfishing of stock above scientifically advised levels.
2. Following from the planned benchmark, the Commission should encourage Coastal States to revisit the management plan currently in place for this stock and request ICES assess the measures and level of fishing effort necessary to avoid the scenario of the stock falling below Blim. When revising the LTMS of Atlanto-Scandian herring, the PelAC recommends the Commission request ICES to undertake a MSE process that would generate scenarios showing the impacts of the current TAC overshoots, and additionally evaluate and incorporate ecosystem and climate considerations.
3. The PelAC reiterates the importance for the Council and the European Parliament to agree expediently the recent legislative proposal from the Commission that expands the EU's toolbox in addressing unsustainable fishing practices by non-EU countries. This proposal, once adopted should help reinforce the process of cooperation, while ultimately countries identified as allowing said practices can ultimately be sanctioned, (e.g. through trade measures).

We thank you in advance for your prompt attention to this matter and would welcome the opportunity to discuss it further with the dedicated DGMARE unit in a meeting rather than through a written response. The PelAC will contact DGMARE services to arrange a suitable time for this discussion.

Kind regards,

Esben Sverdrup-Jensen
Chair of the Pelagic Advisory Council

