

Ms Charlina Vitcheva

Director General

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BELGIUM

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PelAC reference: 2526PAC58

Subject: PelAC recommendations on Total Allowable Catches (TACs) for 2027 for herring stocks

Dear Ms Charlina Vitcheva,

The Pelagic Advisory Council (PelAC) appreciates the opportunity to provide recommendations on Total Allowable Catches (TACs) for 2027 for herring stocks.

We hope that you will take the content of these recommendations into consideration.

Kind regards,



Esben Sverdrup-Jensen

Chair of the Pelagic Advisory Council





PelAC recommendations on Total Allowable Catches (TACs) for 2027 for herring stocks

Consistent with previous advice, the PelAC supports ICES repeated recommendation included in the advice for herring stocks that activities on spawning habitats should only be permitted where their effects have been adequately assessed and shown non-detrimental. The PelAC recommends that additional resources be invested by ICES and scientific institutes in identifying, monitoring and safeguarding key herring spawning grounds.

The PelAC further notes that herring spawning habitats may be affected by a range of pressures, including climate-driven environmental change, physical disturbance of seabed habitats, and other human activities in the marine environment. While evidence exists for some pressures affecting spawning habitat and spawning success, important knowledge gaps remain regarding their relative contribution across the main North East Atlantic spawning areas, with a special emphasis on the North Sea.

The PelAC recommends the European Commission to request ICES, in collaboration with national scientific institutes, and the national fisheries and environment authorities, to undertake a comprehensive assessment that identifies the principal herring spawning grounds, maps the pressures affecting each area, evaluates the relative importance of those pressures, and helps establish priorities for protection, restoration and management. Such an assessment would provide an objective basis for future measures and help ensure that management efforts are directed towards the pressures most relevant to the recovery and long-term productivity of herring stocks.

The PelAC recommends that fisheries managers consider how effective protection of marine habitats suitable for herring spawning can be included in the future National Nature Restoration Plans.

North Sea Autumn Spawning Herring

The PelAC recommends following ICES advice based on the Long-Term Management Strategy, setting the 2027 TAC at 396,680 tonnes an increase of 38% compared to 2026.

The PelAC notes that the recruitment estimate for 2026 is below average relative to recruitment in the last 10-years. The 2025 survey, however, found very high numbers of juveniles in the hauls in the German Bight that were considered as outliers by the model. The PelAC underlines that the fishing pressure on juveniles in 2025 is estimated to be the highest in the past 10 years, possibly related to the sprat fishery. This requires close monitoring.

As highlighted in 2025, the PelAC emphasises that the reduction in productivity observed for North Sea herring would benefit from further research to establish the likely causes. In this context, projects such as C3P-EAUX, which aim to improve understanding of the future productivity trajectories of small pelagics in relation to global change, may help elucidate the processes driving these changes.

Additionally, the PelAC stresses the importance of improving knowledge on the mixing of herring populations within the North Sea herring stock. The continued use of genetic analysis would enable a better understanding of the composition of survey data in terms of autumn and winter spawners and, hence, productivity. The PelAC welcomes the work done by scientific institutes to create a comprehensive survey index of recruits that would include autumn and winter spawners.





The PelAC welcomes the joint special request by the EU, the UK, and Norway to develop an Exceptional Circumstance Protocol (ECP) for this stock. Furthermore, the Herring Assessment Working Group has requested that the NSAS stock undergo a benchmark in 2029, the PelAC supports this request. In the meantime, the PelAC will continue to work on the inclusion of ecosystem considerations in a future Management Strategy Evaluation.

Finally, special management measures have been established in ICES division 3a to minimize Western Baltic Spring Spawning (WBSS) herring bycatch. The PelAC recommends an ICES evaluation to be carried out to measure the effects of these measures. Moreover, an ICES overview of temporal/spatial measures for directed fishing in North Sea and division 3a with unavoidable WBSS herring bycatches allowing the exploitation of North Sea herring, sprat and Norway pout would also be welcomed.

6.a North Autumn Spawning Herring

The PelAC acknowledges that following the ICES MSY-approach for Category 3 stocks results in a TAC for 2027 of 24 tonnes, a reduction of 98% compared to 2026. The PelAC notes that the 98% decrease in advice is a result of an 87% decrease in the spawning-stock biomass (SSB) index, and this biomass index being below the index trigger value (I_{trigger}) prevents application of the stability clause. However, the PelAC has concerns regarding stock delineation, the survey used to define the biomass index, and unresolved issues on the mixing of 6aN herring with North Sea Autumn Spawning herring.

The PelAC notes for the fifth consecutive year, ICES advised that the autumn-spawning herring in 6.a North are genetically the same population as the North Sea autumn-spawning stock. ICES highlighted that both 6aN and NSAS herring stocks are assessed depending on their spatial distribution on either side of the 4-degree West line. ICES also underlined that considerable herring aggregations were found east of the 4-degree line in 2025.

The PelAC recommends an evaluation from ICES to clarify the scientific appropriateness on continuing to assess North Sea Autumn Spawning Herring and 6aN Autumn spawning herring separately. The PelAC suggests a commitment to making such a request to ICES be included in the EU-UK written record.

Furthermore, the PELAC highlights that the Malin Shelf Herring Acoustic Survey (MSHAS), which is the main data input for the assessment, does not cover the entire distribution area of 6aN Autumn spawning herring or account for the mixing between 6a and the North Sea. The PelAC questions the use of the MSHAS as the main fisheries independent input data for the assessment of this stock. Considering the sensitivity of the 6.a herring assessments to the containment of the stock during the MSHAS, the PelAC underlines the importance of testing the impact of the 4-degree West line of longitude.

The PelAC also notes that ICES has issued dual advice relating to the mixing of 6.aN Autumn spawning herring with 6.aS, 7.b-c herring. In addition to the headline advice, ICES states that, *“The fishery for herring in 6.a North includes fish from 6.a South and 7.b–c, which is below I trigger. To be consistent with ICES advice, catches of 6.a South and 7.b–c herring should be no more than 153 tonnes”*. The PelAC questions the value of this dual advice for managers in setting the TAC. Previous





recommendations from ICES that included dual advice may led to misinterpretation from policymakers that should be avoided¹.

The PelAC underlines that 6.aN autumn spawning herring is caught mainly as a bycatch during the Q1 mackerel fishing season. Currently, the UK holds 67% of the quota. If the advice for a 98% reduction in the TAC is followed the EU would have a total TAC of 8 tonnes. Based on historic catches this will make 6.aN autumn spawning herring a high-risk choke species in the Q1 mackerel fishery as well as in the blue whiting, horse mackerel and boarfish fisheries which extend into division 6.aN and where herring can be a potential bycatch. Avoiding herring bycatch, particularly where the volumes are small is technically extremely challenging.

6.a South, 7.b-c Herring

The PelAC acknowledges that following the ICES MSY-approach for Category 3 stocks results in a TAC for 2027 of 153 tonnes, a reduction of 95% compared to 2026. The PELAC notes that the 95% decrease in advice is a result of an 86% decrease in the spawning-stock biomass (SSB) index, and this biomass index being below the index trigger value (I_{trigger}) prevents application of the stability clause. However, similar to the 6a N herring stock, the PelAC highlights there are long-standing issues with the survey that is the main input into this assessment.

As noted by ICES, the Malin Shelf Herring Acoustic Survey (MSHAS), that is the main data input for the assessment, does not contain the stock. It has been observed that based on the results of genetic sampling 2023-2025, 6.aS, 7.b-c herring have been observed to migrate into the North Sea assessment area (east of the 4°W) at the time of the survey. These fish are not included in the biomass index for 6aS, 7b,c but rather in the North Sea stock. Therefore, there is high likelihood that the assessment underestimates the biomass of the 6.aS, 7.b-c herring.

The PelAC highlights that during the most recent benchmark of this stock (ICES WKNSCS 2022), the external reviewers noted that the application of the Category 3 assessment method (chr) relies on an abundance of stock biomass, with the acoustic survey being considered appropriate as it should cover the entire stock biomass. Due to migrations of 6.aS,7.b-c into the North Sea assessment area, the MSHAS no longer covers the entire stock biomass, and therefore this assumption is no longer valid, and the assessment method is no longer appropriate for this stock.

The PelAC supports ICES's call for "*More extensive genetic sampling of herring on the North Sea Herring Acoustic Survey (HERAS) east of the 4°W line from 2026 onwards*" to document the scale of this issue. Further, given that there is already existing data from 2023-2025, the PelAC recommends the Commission request ICES to urgently undertake an additional analysis to estimate the biomass of 6.aS, 7.b-c herring in the survey stratum east of the 4°W line of longitude in these years. Such a sensitivity analysis would enable a sense check of the current ICES advice.

The PelAC also notes problems with the chr (Constant Harvest Rate) rule for this stock and other Category 3 stocks. The 2025 biomass index showed an 86 % decrease leading to a 95 % decrease in advice and the stability clause was not applied as the biomass index was below the index trigger value. PelAC highlights that the rule governing the application of this stability clause may cause further issues

¹PelAC 2025 Irish Sea Herring advice - https://www.pelagic-ac.org/wp-content/uploads/2025/01/2425PAC15_Herring_2025_Fishing_opportunities.pdf





next year pending the results of the 2026 MSHAS. If the biomass on the 2026 survey increases significantly (i.e. if the timing of the survey aligns with a higher proportion of the 6.aS, 7.b-c herring being to the west of 4°W) and it is above the $I_{trigger}$, then the increase in advice will be capped at 20%. Conversely if the biomass increases significantly but it is below the $I_{trigger}$, then the full increase may be advised.

By way of example the $I_{trigger}$ is currently 51,390t and a 2026 survey biomass of 51,391t would result in a 2028 advice of 184t (+20%), whilst a 2026 survey biomass of 51,389t would result in a 2028 advice of 6,680t (+4266%). This highlights the unreliability of the assessment method and the sensitivity to the assumptions on which it is based. The PelAC had highlighted in its 2025 advice for 2026 fishing opportunities the issues related to the discrepancy between the harvest rate calculated by the constant harvest rate (CHR) (7,105 tons) and the advice provided by ICES (3,269 tonnes), which was due to the initial advice level set at the 2022 benchmark. This was set in line with the monitoring TAC, which was based on the assumption that the 6.aS, 7b,c stock was the minority stock in division 6.a. Given these issues with the current category 3 assessment, the PelAC recommends that a category one assessment be developed to provide more stable catch advice.

In line with its previous year's advice, the PelAC highlights issues relating to the exclusion of spring spawning herring biomass in 6.aS, 7.b-c. The fishery targets both winter and spring spawning herring. The PelAC supports the inclusion of spring spawning herring in the stock assessment. There is an urgent need to develop a full analytical assessment. The Irish Marine Institute is working towards this and the PelAC supports such efforts. Sufficient resources should be made available to enable this work to conclude and for a new benchmark conducted. Moreover, further development of genetic methods to discriminate spring spawning herring in division 6.a are needed to improve the assessment.

As with 6.aN autumn spawning herring, the PelAC also notes ICES has issued dual advice relating to the mixing of 6.aS, 7.b-c herring with 6.aN autumn spawning herring. The PelAC questions the value of this dual advice for managers in setting the TAC.

Celtic Sea Herring

The PelAC notes that ICES advises a 0 catch for 2027 and 2028 advice following the MSY approach. ICES noted that the stock was not expected to recover above Blim in the next three years, leading to the issuing of biennial advice. As in previous years, ICES has advised a monitoring TAC of 869 tonnes as a catch option to facilitate continued data collection. The PelAC supports the setting of a monitoring TAC at this level.

The PelAC acknowledges that the SSB of Celtic Sea herring has increased from approximately 10,000 tonnes in 2018 to about 20,000 tonnes currently. Fishing pressure on the stock, in the Celtic Sea, has been very low over the recent years. Despite this, recruitment has remained low, with limited signs of recovery.

The PelAC highlights that the advice from ICES underlines the issues of mixing between Irish Sea and Celtic Sea herring. ICES notes that the consequences of the mixing on the status of the Celtic Sea herring stock are being evaluated. The PelAC welcomes this but stresses this is a long-standing issue that needs to be resolved.





The PelAC supports the ongoing work towards the development of a synoptic survey covering the Irish Sea, Celtic Sea, Bristol Channel and potentially English Channel as being progressed through the ICES Workshops on the Feasibility of a Synoptic Survey in the Irish Sea, Celtic Sea, and English Channel (WKFICES).

Irish Sea Herring

The PelAC recommends following the ICES MSY-advice and setting the TAC for 2027 at 3,716 tonnes, an increase of 27% compared to 2026. ICES notes that in 2026, the EU and UK agreed a TAC 42% above the scientific advice.

The PelAC has consistently highlighted concerns over the quality of this assessment and requested that it be benchmarked to address the longstanding issues around the assessment. The PelAC welcomes the expected benchmark planned for 2028 and stresses that the remaining issues need to be resolved.

Moreover, the PelAC supports the need to address the mixing issues between the Celtic Sea and Irish Sea herring, which have been acknowledged for many years. In this context, the PelAC supports the work being carried out by the Irish Marine Institute and the Northern Ireland Agri-Food and Biosciences Institute (AFBI) to collect samples for genetic analysis from the Irish Sea herring stock. It is imperative that such initiatives are conducted in a coordinated manner and apply the most appropriate methods as recommended by ICES WKSIDAC3. Future assessments should take account of mixing and allocate biomass appropriately between the relevant stocks.

Similar to the Celtic Sea herring advice, the PelAC supports the development of a synoptic survey covering the Irish Sea, Celtic Sea, Bristol Channel and potentially English Channel as being progressed through ICES WKFICES.

