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

Date: 17 November 2006
Our reference: PRAC06.30/IH
Subject: Recommendations Pelagic RAC

Dear Mr. Holmquist

The Pelagic RAC is very pleased to submit its recommendations concerning herring, mackerel, blue whiting, horse mackerel, sprat, and MSY. The recommendations as presented below include the ones that were sent to the Commission on October 11th, supplemented with those on stocks for which the ICES/ACFM advice has come out more recently.

The recommendations have the support of both the industry and the other interest groups. 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 that extends to the right.

Dr Ingvild Harkes

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

Pelagic RAC Recommendations, November 2006

Questions on scientific methods of the herring fishery in VIId 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

Recommendations:

- Roll over TAC.
- The Pelagic RAC will provide a proposal for a recovery plan.

Herring Div VIa north (west of Scotland)

Recommendations:

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

1. 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".

2. 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.

3. 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 (North Sea herring)

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 t. 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 1.1 mt, 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 t 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 VIIbc

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
- The finalisation of the management plan should await new scientific information to be available shortly from a three year completed international project named WESTHER established under the 5th Framework (Contract QLRT-2001-01056) as a multidisciplinary approach to the identification of herring (*Clupea harengus L.*) stock components west of the British Isles using biological tags and genetic markers.
- In the meantime the TAC for 2007 should be rolled-over at the same level as 2006.

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.

Norwegian spring-spawning (Atlanto-Scandian) herring

Recommendations:

- The Coastal States are encouraged to reach an agreement for 2007 with only one TAC applying. However, should this not prove possible the EU should seek a bilateral agreement with Norway.
- The TAC should be set at the level of 1,112,000 t representing a 15% increase on 967,000 t (the sum of autonomous allocations from the individual parties in 2006).
- The management plan should be adapted to include:
 - A TAC constraint of +/- 15%.
 - Year-to-year flexibility of +/-10% with a maximum of 2 years.

Northeast Atlantic Mackerel

TAC 2007: 500,000 t

Endorsement:

The Coastal State agreement setting the 2007 TAC at 500,000 t is endorsed and the RAC expresses satisfaction that the improved Community control regime has resulted in an increased TAC.

Recommendations:

- The timing of the Coastal State meeting should be changed in future to allow the RAC time to comment on the scientific advice and make recommendations.
- The management plan should be reviewed to include:
 - A specification on the actual implementation of rapid recovery.
 - Clarification and prioritisation of the different decision rules.
 - A +/- 15% TAC restraint.
 - Year-to-year flexibility of +/- 10% with a maximum of two years.
- The RAC is very concerned about the prospect of the diminution of the 2007 egg survey and urges the Commission to seek re-instatement of the survey to previous levels.
- A management plan should be developed for the North Sea component.

Blue whiting combined stock

TAC 2007: 1,7 mt

Recommendations:

- The timing of the Coastal State meeting should be changed in future to allow the RAC time to comment on the scientific advice and make recommendations.
- Measures should be adopted to protect juvenile blue whiting. ICES should be requested to provide input on appropriate measures to be adopted.
- The management plan should be amended to include:
 - A TAC constraint of +/- 15%.
 - Year-to-year flexibility of +/-10% with a maximum of 2 years.
- Coastal States should be able to undertake quota swaps.
- ICES should be requested to consider more closely the different stock components.

Western horse mackerel

Recommendations:

- The TAC (137,000 t) for zone Vb (EC waters), VI, VII, VIIIa,b,d,e, XII, XIV should be rolled-over in the understanding that a comprehensive management plan is developed for 2008, including area VIIIc. The TAC recommendation for VIIIc is covered under the southern component.
- The Commission should ensure that Member States should fulfil their obligations under the data directive regarding the provision of catch-at-age data.
- The informal scientific working group should be encouraged to develop a management framework and criteria to be inserted into the management framework.
- Alignment between scientific assessment areas and management areas.

North Sea horse mackerel

Recommendations:

- The 2006 TAC should be rolled over until the data issues are resolved.
- A working group should be established to consider how to improve the research.
- A working group should be established to address the bycatch issues in the horse mackerel fishery.
- Alignment between scientific assessment areas and management areas.

Southern horse mackerel

Recommendation:

- The 2006 TAC of 55,000 t for zone VIIIc and IX should be rolled-over for 2007.
- Alignment between scientific assessment areas and management areas.

Sprat

Recommendation:

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

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.