

Ms Charlina Vitcheva

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

Date: 7 October 2024

PelAC reference: 2425PAC03

Subject: Benchmark request for Irish Sea and Celtic Sea herring

Dear Ms. Charlina Vitcheva,

The PelAC over the last number years has called for a benchmark for the Irish Sea and the Celtic Sea herring to no avail. There is now an urgent need to carry out this benchmark in light of the ICES reissued Irish Sea herring advice for 2024.

In June 2024 ICES reissued the 2024 advice for Irish Sea herring (her.27.nirs), due to a substantial revision to the assessment, at HAWG 2024, following the discovery of an error in the configuration of the model (ICES, 2024a). The issue affected the absolute perception of the stock and warranted an update of the reference points and a reissue of the advice for 2024. The new configuration and reference points led to a downward revision of the stock size to below $MSY B_{trigger}$, an upward revision of F to above F_{MSY} and a 34% reduction in the advised catch for 2024. ICES also delayed, without explanation, the release of the 2025 catch advice until October 31st.

The reissued advice noted in both the *Quality of the Assessment* and *Issues Relevant for the Advice* that the Irish Sea herring assessment is confounded by the presence of herring from adjacent stocks, including the Celtic Sea, in the catch and survey data, which may result in the assessment overestimating the Irish Sea Stock. Whilst this has been noted in previous Irish Sea advice it was assumed and stated that the issue only affected the younger age classes. As noted in the reissued advice, recent genetic analyses have demonstrated that the “*proportion of herring from neighbouring populations was particularly significant in the area to the west of the Isle of Man, where the highest abundance of herring is observed and the main Irish Sea fishery occurs. The non-Irish-Sea herring included herring from all length classes and comprised immature and mature individuals.*” This is a significant issue for both the Irish Sea assessment, which is overestimating the Irish Sea stock and also for the Celtic Sea assessment, which is currently advised as a zero TAC. The Celtic Sea stock is incurring an unquantified mortality in the Irish Sea herring fishery.





The current ICES advice for both the Irish Sea and Celtic Sea herring stocks do not enable well founded management decisions concerning sustainable catch levels to be determined. Continued overestimating of the Irish Sea stock and inflation of the catch advice is contributing to the lack of recovery of the Celtic Sea stock.

In the short term there is an urgent need for ICES to implement its own recommendations in relation to the Irish Sea and Celtic Sea herring stocks. The impact of the Irish Sea fishery on the Celtic Sea stock should be assessed by ICES and transparently communicated in both advice sheets so that informed management decisions can be made for both stocks. This should include developing and presenting catch options that account for varying proportions of mixing of Celtic Sea herring into the Irish Sea herring area.

The PelAC is requesting that the Commission ask ICES to carry out as a matter of urgency a combined benchmark of the Irish Sea and Celtic Sea stock assessments to address the aforementioned issues. ICES should also be asked to conduct a retrospective analysis on the impact of the inappropriate assessment of Irish Sea herring and the provision of inflated advice for the past seven years.

Yours sincerely,

Esben Sverdrup Jensen
Chairman Pelagic Advisory Council

