

Ms Charlina Vitcheva

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

Date: 13 January 2025
PelAC reference: 2425PAC15

Subject: 2025 fishing opportunities recommendation for herring in 6a North, herring in 6a South and 7bc and Irish Sea herring

Dear Ms. Charlina Vitcheva,

The Pelagic Advisory Council (PelAC) appreciates the opportunity to provide recommendations on Total Allowable Catches (TACs) in 2024 for herring in 6a North, herring in 6a South and 7bc, and Irish Sea herring. Due to delays in the publication of ICES advice on these stocks, the PelAC had to delay publication of these recommendations.

Herring in 6a North

The PelAC recommends following the ICES MSY-advice and setting the TAC in 2025 at 1,745 tonnes. Additionally, in line with its 2024 advice, that the Commission request ICES evaluate the current view that North Sea Autumn Spring Spawners (NSAS) and 6a North herring stocks should continue to be assessed separately given there is substantive evidence that autumn-spawning herring in 6a North are genetically the same population as the North Sea autumn-spawning stock (NSAS).

Herring in 6a South and 7bc

The PelAC recommends following the ICES MSY-advice and setting the TAC in 2025 at 2,724 tonnes. In line with its advice from last year, the Commission request ICES to undertake further work to progress the stock to a category 1 assessment. Finally, the PelAC recommends continuing and expanding the scientific sampling programme for this stock.





Irish Sea herring

In its previous advice, the PelAC recommended the continuation of work that addresses the mixing of Irish and Celtic Sea herring. This recommendation was made considering the new evidence that emerged from the AFBI herring stock identification project. It indicated a significant proportion of Celtic Sea herring seasonally migrating into the Irish Sea. Following the identification of an error in the configuration of the model (ICES, 2024a), ICES reissued the 2024 advice with significant changes to the perception of the stock and the reference points.

The reissued advice highlights in both the *Quality of the Assessment* and *Issues Relevant for the Advice* sections 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 over-estimating the Irish Sea Stock. In line of this viewpoint, the PelAC circulated a specific letter addressing the issues of Celtic Sea and Irish Sea mixing and suggesting that a combined benchmark of the Irish Sea and the Celtic Sea stocks be carried out¹.

In its advice, ICES presents both the precautionary approach to protect the Celtic Sea herring stock and a catch option based on the FMSY point estimate. The advice sheet shows the stock is fished above FMSY, Fpa and Flim, and spawning-stock size is just below MSY Btrigger and above Bpa, and Blim. The FMSY approach, which does not take account of the impacts of the mixing on either stock advises a catch equating to 49% of the 2025 SSB at a level of 5,223 tonnes. The precautionary advice for zero catch accounts for the mixing between Irish Sea, Celtic Sea, and other stocks in the commercial catches taken in the northern Irish Seas without being able to quantify the actual level of mixing. However, ICES has not tested and therefore cannot conclude on the impact of the precautionary approach on the rebuilding capacity of Celtic Sea herring

The PelAC is concerned with the ICES catch advice, which ambiguously presents recommendations based on both the precautionary approach and the MSY approach. Given this ambiguity of the advice the PelAC recommends that ICES should revoke the current advice and carry out the necessary analyses to develop robust catch advice. Furthermore, the PelAC urges the Commission to request ICES continue efforts to address the mixing issue between Irish and Celtic Sea herring and for ICES to develop a plan and a timeline for the benchmark of these two stocks. The PelAC is of the opinion that the issues in the model following the 2017 benchmark led ICES to publish 2 approach.

¹ <https://www.pelagic-ac.org/wp-content/uploads/2024/10/2425PAC03-PelAC-Benchmark-request-for-Irish-Sea-and-Celtic-Sea-herring.pdf>





ICES non fisheries conservation considerations

For all three herring stocks, ICES provides advice on non-fisheries conservation considerations. This advice is included by ICES where clear, demonstrable management action can be recommended for non-fisheries related pressures. For herring stocks, ICES underlines the need to preserve spawning habitats from the effects of all non-fishery anthropogenic impacts. The PelAC would like to underline that this is of utmost importance when considering the development of gravel extraction or ORE development. Furthermore, in light of the recent Commission guidelines on Renewable Acceleration Areas, the PelAC emphasizes that spawning areas should be excluded from these designations.

Yours sincerely,

Esben Sverdrup-Jensen
Chair Pelagic Advisory Council

