



**European Association of Fish Producers Organisations (EAPO)  
(Northern Pelagic Working Group – NPWG)**

To:

- Euro Commissioner Mr. Vella
- Council of Fisheries Ministers

Subject: ICES advice on herring for 2019 / additional banking possibility

Date: 5<sup>th</sup> of June, 2018

Dear Mr. Vella , Dear Ministers,

On May 30<sup>th</sup> ICES presented the scientific advice for a number of the most important fish stocks for the European pelagic fleet. For two fisheries, Western Baltic Herring and Herring in the Skagerrak/Kattegat, ICES advises on a full closure of fishing activities. For the largest and most valuable fishery, herring in the North Sea, ICES advises on a +50% reduction in catches for 2019. The ICES scientific advice, and the risk of closing fisheries in 2019 poses a real and serious threat to the pelagic fleets, processors and jobs in coastal communities.

The members of the NPWG encourages the EU Commission and Member States to closely scrutinise the scientific advice on the herring stocks ahead of the upcoming political negotiations on fishing opportunities for 2019. In general, for both North Sea Herring and Western Baltic Herring ICES indicates that stock biomass is lower than expected, but that recent recruitment is strong and that the condition of both is on a positive path. All possible measures must be explored to secure sustainable management of the herring stocks without sacrificing the survivability of the fleets and those communities that depend on them.

One key measure in securing market stability and continuation of fishing activity and production, is the interannual flexibility fixed in the CFP. The inter annual flexibility allows fishermen to “bank” quota from one year to the next, or to “borrow” from next years quota to this year. The system works very well in securing full utilisation of quotas and in optimising production and marketing strategies.

The intervention we urgently ask for is a temporary emergency measure to allow fishermen to bank more than the usual 10% of their quota allocation under the normal rule of the flexibility regulation in order to stabilise markets for herring and secure continued production in 2019. We feel strongly that the current extraordinary situation urgently requires a special temporary measure which in our view is to allow the possibility to bank up to 25% of the 2018 quota allocations for North Sea Herring, 3A Herring in Skagerrak/Kattegat and Western Baltic Herring

It's imperative that a provision to permit increased banking must be decided very quickly as individual fishermen and fish processors must decide on what to do (if and in how far they want to make use of the given additional possibility) and to give them time to amend their fishing and production plans accordingly for the remainder of this year.

We feel that such a decision can be decided between EC and Council and that it therefore could be done straightforwardly and speedily. Similar provisions have in the recent past (2014 And 2015) been agreed for the various pelagic stocks in relation to market issues and in 2017 at Coastal States level due to the substantial reduction in the TAC for Atlanto Scandian Herring.

We urge the European Commission to prepare a proposal for the upcoming Council meeting of fisheries ministers.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gerard van Balsfoort', with a large, stylized initial 'G' and a long horizontal stroke extending to the right.

Gerard van Balsfoort  
(chair Northern Pelagic Working Group)