



Surveillance Report
PFA North Sea Herring Fishery

Certificate No.: **MML-FC-011**

Moody Marine Ltd.
July 2007

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1.0 GENERAL INFORMATION

Scope against which the surveillance is undertaken: MSC Principles and Criteria for Sustainable Fishing as applied to the PFA North Sea Herring Fishery

Species: Herring (*Clupea harengus*)

Area: North Sea and Eastern English Channel (ICES Divisions IV and VIIId), within EEZ's of the EU and Norway

Method of capture: Pelagic trawl fishery

Date of Surveillance Visit:	10-11 July 2007 and 18 July 2007			
Initial Certification	Date: 8 May 2006		Certificate Ref: MM-FC-011	
Surveillance stage	1st	2nd	3rd	4th
Surveillance team:	Lead Assessor: Andrew Hough Assessor(s): J Nichols			
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2.0 RESULTS, CONCLUSIONS AND RECOMMENDATIONS

The first surveillance audit of this fishery (carried out in November 2006) reported the following conclusions:

“It is noted that when last assessed in March 2006 the spawning stock remained well above the biomass precautionary limit of 1.3 million tonnes and was predicted to be at Bpa in autumn 2006, the time of the present audit. Future stock status is dependent upon actual levels of recruitment in Autumn 2006. However, the status of the stock is predicted (on the basis of a relatively high degree of knowledge of the stock dynamics, recruitment and a well-tested assessment) to decline in the short to medium term if recent poor levels of recruitment continue. This potentially significant change in the status of the fishery, under MSC assessment methodologies, will require an expedited audit to evaluate the effects of such change on the certified status of the fishery. this additional audit shall be used to evaluate:

- *the latest assessment results (including 2006 recruitment indices)*
- *ACFM advice*
- *PFA’s position in relation to the assessment results and ACFM advice*

To allow the above management factors to be evaluated (these representing a potentially major change in the fishery), this expedited audit is planned to take place early in June 2007.

If the 2007 stock assessment (to be evaluated in the expedited audit in June 2007) predicts the stock falling below Bpa (i.e. 2006 recruitment is again poor), then Moody Marine would need to carry out a limited assessment of Performance Indicators relating to stock status. This could lead to the requirement to raise further conditions of certification. Clearly, continuing poor recruitment will require further significant and precautionary reductions in the TAC, such as to allow the stock to be rebuilt to a specified level, consistent with the precautionary approach, and within a specified time frame, as required under MSC Principle 1, Criterion 2.

In addition, PFA have taken measures to address (at least in part) most, but not all, of the Conditions of Certification raised during the MSC certification assessment. Where the meeting of Conditions is behind schedule, these items will also be evaluated at the expedited audit.”

This present report therefore contains the findings of the expedited audit (the timing of which was delayed slightly to allow for the presence of key personnel).

Information has been collected principally from various ICES reports, consultations with PFA and consultations with IMARES and the North Sea Foundation.

The PFA response to Conditions of Certification is set out in the PFA Action Plan and this has been reproduced below as appropriate. For each condition, the report sets out progress to date. This progress has now been evaluated by the Moody Marine assessment team (‘Observations’ and ‘Conclusion’) against the commitments made in the Action Plan. This evaluation includes a re-evaluation of the scoring allocated to the relevant Performance Indicators in the original MSC assessment. Where the requirements of a condition are met, the Performance Indicators are re-scored and if the score is 80 or more, then the condition is closed.

The effects of any overall legislative and management changes in the fishery are also taken into consideration.

Item	Comments
1	Condition of Certification 1: Communication with Management and Research Organisations
Activity assessed	<p>The evaluation concluded that the majority of fishery-related mortality on the target stock is recorded or well estimated. However, PFA are in a position to further assist the stock assessment process by providing specific and accurate data to fishery managers and scientists.</p> <p>Accordingly, PFA shall make available, to <i>bona fide</i> National management and scientific bodies within each country that the PFA Group operate from, all VMS, logbook, or other information relating to the fishery, that would reasonably be requested for management or research purposes. As part of the ongoing surveillance programme for certified fisheries (required for maintenance of certification), any organisation denied access to such information is invited to report this matter to Moody Marine.</p> <p>Timescale: This requirement would apply to all information gathered from the date of certification. Liaison with relevant organisations to establish procedures for transfer of information should be implemented immediately upon certification.</p> <p>Relevant Scoring Indicators: 1.1.2.1, 3B.6.1</p>
PFA Action Plan	The PFA will fulfil this requirement. Requests of bona fide national management and scientific bodies have to be sent (in written form) to the secretariat of the PFA. The PFA will keep a file of all requests and responses.
Observations	<p>This condition requires PFA to respond appropriately to bona fide requests for information.</p> <p>Current information is that, to date, very few requests have been received. These appear limited to:</p> <ul style="list-style-type: none"> a) a request from IMARES (Netherlands) for VMS position data for the PFA fleet, to be used in a study of fleet versus stock dynamics. It is understood that this data is to be provided and that negotiations are taking place with national control agencies to ascertain means of retrieval. However, there does seem to be some delay in providing this information. b) It is understood that a voluntary agreement has been reached between the relevant Government department (DEFRA and SEERAD) and the UK industry, including UK PFA companies, to supply position and catch data on a daily basis. <p>The conclusion of the previous audit was: <i>“The delay in the supply of VMS data to IMARES is of potential concern and PFA should expedite the provision of the information requested.</i></p> <p><i>Conversely, the voluntary supply of data within the UK is seen as a very positive development.</i></p> <p><i>There does not, however, appear to have been clear liaison with relevant organisations making clear PFA’s willingness to provide such information.</i></p> <p><i>This condition has been only partially met to date. Accordingly, this condition is partly behind target and full compliance should be actioned forthwith. The change in the General Secretary of the PFA, with Gerard van Balsfoort starting in April 2006 and not formally taking up the position until August 2006 is seen as a valid contributing factor in this delay.</i></p> <p><i>Nevertheless, communication with relevant agencies and provision of data within reasonable timeframes must now be undertaken immediately and will re-evaluated in an expedited audit. As detailed below, this is currently planned for June 2007.”</i></p> <p>PFA have agreed to the provision of VMS data to IMARES as participation in the CAFÉ project and to allow provision of PFA VMS data by relevant authorities from the year 2006. Provision of data to UK authorities continues.</p>
Conclusion	It is now noted that PFA have agreed to the provision of VMS data (although this is not the

	<p>case for other participants in the North Sea herring fishery). The intent to participate has been demonstrated (Letter of June 7 2007) and no requests for information have been refused.</p> <p>The requirements of this Condition have now been met.</p> <p>Two Performance Indicators (PI) related to this Condition. These, and related 80 and 100 Scoring Guideposts (SG) are presented below.</p> <p>PI 1.1.2.1</p> <p>SG 80: Landings are accurately recorded. Discards and incidental mortality are well estimated. Mortality on juveniles is monitored and recorded separately.</p> <p>SG100: Landings, discards and incidental mortality are accurately recorded and monitored. Mortality on juveniles is monitored and recorded separately.</p> <p>This PI is considered under Condition 6 below.</p> <p>PI 3B.6.1.</p> <p>SG 80: Fishery operatives are regularly involved in the collection and recording of catch, discard and other information.</p> <p>SG 100: Fishery operatives assist significantly in the collection and recording of catch, discard and other information.</p> <p>This PI is considered under Condition 6 below.</p> <p>Ongoing compliance with the intent of this condition will now be monitored in future as part of annual surveillance audits.</p>
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Item	Comments
2	Condition of Certification 2: Use of Observers on PFA Vessels
Activity assessed	<p>It is noted that PFA have in the past variously provided access to their vessels to independent scientific observers and for on-board catch-sampling opportunities, which is to be commended. Such use of observers is a valuable source of information for management and scientific purposes.</p> <p>PFA shall therefore liaise with <i>bona fide</i> scientific bodies, within each country that the PFA Group operates from, to maximise the access to PFA vessels participating in this fishery for observers and/or to maximise the availability of catch sample information. As a part of the ongoing surveillance programme for certified fisheries (required for maintenance of certification), any organisation denied a reasonable request to place a scientific observer on board or for onboard sampling, is invited to report this matter to Moody Marine.</p> <p>Timescale: This requirement would apply to all PFA Group sailings from the date of certification. Liaison with interested organisations to establish their requirements for observers/samples and to make appropriate provision of access to vessels should begin immediately upon certification.</p> <p>Relevant Scoring Indicators: 1.1.2.1, 2.1.2.2, 3B.6.1</p>
PFA Action Plan	<p>A scientific observer scheme is part of different EU-regulations (regulation on deep sea fishing, protection of cetaceans regulation and data collection regulation). PFA requests that the activities of the observer in order to meet this condition are as much as possible combined with observer-activities in the framework of these and (possible new) EU-regulations that involve observer schemes. Requests to place a scientific observer on board has to be sent (in written form) to the secretariat of the PFA.</p>
Observations	<p>Observers have been present on PFA Dutch and German vessels throughout 2006 and further trips are planned/underway for the 2007 season. These have recorded, among other items, catches and any discarding and have sampled catches for weight at age recording etc.</p> <p>The conclusion of the previous audit was “<i>This condition appears to be on target, but shall be subject to further monitoring in combination with Condition 1 before final review.</i>”</p>
Conclusion	<p>The requirements of Condition 1 have been met, and observers are to be accommodated in 2007. There is no evidence of any requests for observers on PFA vessels being refused.</p> <p>The requirements of this Condition have now also been met.</p> <p>Three Performance Indicators (PI) related to this Condition. These, and related 80 and 100 Scoring Guideposts (SG) are presented below.</p> <p>PI 1.1.2.1 SG 80: Landings are accurately recorded. Discards and incidental mortality are well estimated. Mortality on juveniles is monitored and recorded separately. SG100: Landings, discards and incidental mortality are accurately recorded and monitored. Mortality on juveniles is monitored and recorded separately</p> <p>This PI is considered under Condition 6 below.</p> <p>PI 2.1.2.2. SG 80: Information is available to allow estimates of discard and slippage to be calculated and interpreted. SG 100: Accurate and verifiable information (quantity and proportions in terms of species, length/weight and sex) is available on the extent of all discards and slippage, and consequences of these. Or the entire catch is landed.</p> <p>This PI is considered under Condition 4 below.</p>

	<p>PI 3B.6.1.</p> <p>SG 80: Fishery operatives are regularly involved in the collection and recording of catch, discard and other information.</p> <p>SG 100: Fishery operatives assist significantly in the collection and recording of catch, discard and other information.</p> <p>This PI is considered under Condition 6 below.</p> <p>Ongoing compliance with the intent of this condition will now be monitored in future as part of annual surveillance audits.</p>
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Table 1. PFA summary information

Current PFA Vessels are listed below:

SCH 6 Alida
SCH 303 Ariadne
SCH 333 Oceaan VII
FC 630 Scombrus
FC-900 Prins Bernhard
H-90 Atl. Princess
H-171 Cornelis Vrolijk
SCH-72 Frank Bonefaas
ROS 785 Helen-Mary
ROS 784 Dirk-Dirk
ROS 170 Annie-Hillina
BX 783 Jan-Maria
KW 171 Maartje Theadora
KW 172 Dirk-Diederik
KL 749 Margiris
FC 716999 Sandettie
SCH 24 Afrika
SCH 118 Johanna Maria
SCH 123 Zeeland
PH 110 Wiron 1
PH 220 Wiron 2
SCH 22 Wiron 5
SCH 23 Wiron 6

Additional vessels included within the PFA Unit of Certification for the 2007 season. These are fishing in accordance with PFA procedures in line with the requirements of this MSC certification.

HG 264 Ruth (Hirtshals)
FR 228 Chris Andra
FR 226 Challenge
FR 227 Taits

Swedish vessels may also be included.

Documents relating to inclusion of the Ruth were inspected during the current audit.

Item	Comments
3	Condition of Certification 3: Recording of incidental sources of mortality in the herring-directed fishery
Activity assessed	<p>The majority of fishery-related mortality on the target stock is recorded or well estimated, and the conditions above would increase the accuracy of any estimates. Nevertheless, there are additional sources of fishery-related mortality for which further, more comprehensive, recording is required. PFA are in a position to assist the stock assessment process by providing specific and accurate data to fishery managers.</p> <p>Additional sources of such potential mortality identified during this assessment are:</p> <ul style="list-style-type: none"> • Slippage of herring from nets prior to pumping on-board • Accidental damage to nets causing release of catch, again prior to pumping • Post-harvest discard of catch, for example following accidental breakdown of systems on-board vessels etc (e.g. breakdown of refrigerated seawater systems). <p>It is acknowledged that many within the industry consider that release prior to pumping on board does not represent a source of mortality. Evidence, however, suggests that all or a significant proportion of these fish may subsequently die. Knowledge of the extent of this problem is therefore considered necessary</p> <p>PFA should therefore record such losses as mortality or, to demonstrate the level of mortality occurring in relevant circumstances, PFA may wish to carry out or commission supplementary research which demonstrates the degree of survival of herring post capture and towing in trawl gear in circumstances typical of their normal fishing operations. Estimates of mortality can then be reviewed accordingly.</p> <p>It is therefore required that PFA record and report to National management and scientific bodies within each country that the PFA Group operate from all such instances of potential mortality with best estimates of the quantities involved. Under current CFP rules, such reporting of potential mortality would not count against quota allocations, but would be an area of monitoring of environmental performance. This information would, however, be available to stock assessment scientists.</p> <p>Timescale: Recording of such incidental mortality should occur immediately from the time of certification.</p> <p>Relevant Scoring Indicators: 1.1.2.1, 3B.6.1</p>
PFA Action Plan	PFA will make a written instruction for the skippers. In this instruction skippers are required to fill in part sixteen (16) of the EU-logbook to record incidental mortality in the herring-directed fishery.
Observations	<p>The conclusions of the previous audit were: <i>“Compliance with the Action Plan was behind target and conformance with the PFA instruction was not measurable during the present audit. Data on compliance with this instruction shall be collated by PFA and this issue will now be followed-up during an expedited audit in combination with Condition 1.”</i></p> <p>The instruction to skippers to complete part (16) of the EU logbook was issued at the time of the last audit. Compliance with this instruction has been demonstrated through provision of copies of logbooks from PFA member companies showing completion of part 16 for herring and by-catch species.</p> <p>It is also noted that IMARES has independently studied the herring discard situation in the Dutch/PFA freezer-trawler fleet. Discards are estimated to be less than 5%, which IMARES consider a positive outcome. Acceptable operational reasons for observed discards were provided.</p>
Conclusion	<p>The requirements of this Condition have been met and discard reporting is now fully underway.</p> <p>Two Performance Indicators (PI) related to this Condition. These, and related 80 and 100 Scoring Guideposts (SG) are presented below.</p>

	<p>PI 1.1.2.1 SG 80: Landings are accurately recorded. Discards and incidental mortality are well estimated. Mortality on juveniles is monitored and recorded separately. SG100: Landings, discards and incidental mortality are accurately recorded and monitored. Mortality on juveniles is monitored and recorded separately</p> <p>This PI is considered under Condition 6 below.</p> <p>PI 3B.6.1. SG 80: Fishery operatives are regularly involved in the collection and recording of catch, discard and other information. SG 100: Fishery operatives assist significantly in the collection and recording of catch, discard and other information.</p> <p>This PI is considered under Condition 6 below.</p> <p>Ongoing compliance with the intent of this condition will now be monitored in future as part of annual surveillance audits.</p>
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Item	Comments
4	Condition of Certification 4: Compliance with PFA Policies
Activity assessed	<p>The PFA has voluntarily implemented a number of policies to promote sustainable fishing in their fleet. These policies, whilst a significant step within themselves, now need to be supported by procedures to formally measure the performance of skippers against relevant policies (including, but not limited to, the following):</p> <ul style="list-style-type: none"> • limit discards to a minimum; • member ships of the PFA are not permitted to deliberately discard marketable fish to make room for fish of a higher commercial value that are caught later ('highgrading'); • make information about the fishing activities available to interested organisations; • take initiatives (or supports initiatives) for activities that lead to adequate measures to counter by-catches and discards; • through the application of modern technology, to further reduce the occurrence of by-catches and discards. <p>The PFA should also describe appropriate sanctions in the event of breach of these procedures.</p> <p>The internal measurement of environmental performance within the PFA will be considered by Moody Marine (during annual surveillance audits) in combination with feedback from other organisations, particularly management and research bodies, in relation to other conditions identified here.</p> <p>Timescale: The implementation of procedures to enforce PFA policies should be initiated upon certification and completed within 18 months of certification.</p> <p>Relevant Scoring Indicators: 1.1.2.1, 2.1.2.2, 3B.6.1</p>
PFA Action Plan	<p>PFA will work out a set of procedures in combination with sanctions in the event of breach of the procedures concerned. This procedure will be initiated in the next PFA meeting, which will be held late 2005. The draft procedures will be discussed with Moody Marine. Procedures will be implemented at the 2007 fishing season at the latest.</p>
Observations	<p>The conclusions of the previous audit were: <i>"Compliance with the Action Plan is behind target. Appropriate development of procedures should be begun immediately by PFA and this issue will now be followed-up during the expedited audit"</i></p> <p>PFA have now agreed and issued a policy statement:</p> <p><i>"On the level of compliance with abovementioned condition no. 4 the following can be argued:</i></p> <ul style="list-style-type: none"> - <u>To limit discards to a minimum:</u> <i>A discard survey by IMARES at the Dutch PFA fleet has shown that herring discards by this fleet is minimal (less than 5%). IMARES considers this is a very marginal discards percentage.</i> - <u>Prohibition to high grade by PFA vessels:</u> <i>To strengthen this policy PFA has to set up a sanction regime (see proposal hereunder).</i> - <u>Make information available to interested organizations:</u> <i>PFA is actually complying with this condition, so no further action is needed. Examples: close cooperation with scientists on various fisheries (herring, horse mackerel EU, jack mackerel in the Pacific, by-catch issues in the fisheries in Mauritania) and sharing information upon request to other organisations such as WWF.</i> - <u>Take or support initiatives to counter by-catch and discards:</u> <i>PFA complies with this condition. Examples: discards surveys on the fleet (PFA is an exception in the pelagic fisheries), research projects on the PFA fleet to minimise/prevent by-catch of</i>

	<p><i>larger organisms in the Mauritanian fisheries (still ongoing), several research projects towards more selective fishing in the horse mackerel fisheries,</i></p> <p>- <i><u>Application of modern technologies to further reduce by catch / discards:</u></i> <i>There is compliance with condition.</i></p> <p><i>Examples: Twinson project (development and use of highly sophisticated set of sonar to detect better horse mackerel from mackerel during the fisheries), the Excluder project (development of a gear device to counter by catch of sharks, turtles and cetaceans), research and use of pingers.</i></p> <p><i>Therefore the PFA proposes the following policy of sanctions regarding deliberate high grading and slippage:</i></p> <ol style="list-style-type: none"> <i>1. High grading or slippage is forbidden on any of the PFA vessels in any of the fisheries executed by this fleet, except in exceptional circumstances due to breakdowns or for safety or QC reasons.</i> <i>2. The ship owner does actively support this policy towards the crew of the vessel, in particular the skipper, for the skipper is the one who actually makes the decisions during the fishing.</i> <i>3. If there is any evidence of a situation of high grading or slippage on board a PFA vessel, the ship owner will report this to the PFA.</i> <i>4. Also information from third parties on alleged high grading or slippage by PFA vessels will be brought under the attention of the PFA.</i> <i>5. The PFA will set up a committee of 4 persons, chaired by the president of the PFA, that will consider the evidence or information of the alleged infringement of high grading or slippage.</i> <i>6. This committee will decide if the alleged high grading or slippage has taken place or not, and if this action was a deliberate one, and if there were not circumstances that explained the alleged high grading or slippage.</i> <i>7. If the committee concludes that high grading or slippage has taken place deliberately and avoidable, the committee will issue a formal and written warning to the skipper.</i> <i>8. If the same skipper will run into a second warning a financial sanction (fine) will be issued against the skipper amounting to € 2,000, to be paid to the PFA by the skipper.</i> <i>9. If the same skipper has breached this policy for the third time, he will be suspended from his fishing activities for the period of one month without receiving salary or any other payment by his employer or any other member of the PFA.</i> <i>10. During this period he is not permitted to work on any other vessel belonging to the PFA.</i> <i>11. If there is evidence that the skipper has acted upon order by his employer or by a person representing his employer, the president of the PFA will issue a meeting of all members of the PFA to discuss the situation. In that case the skipper will not be sanctioned.”</i>
Conclusion	<p>The requirements of this Condition have now been reasonably met and the Condition is closed.</p> <p>Three Performance Indicators (PI) related to this Condition. These, and related 80 and 100 Scoring Guideposts (SG) are presented below.</p> <p>PI 1.1.2.1</p>

	<p>SG 80: Landings are accurately recorded. Discards and incidental mortality are well estimated. Mortality on juveniles is monitored and recorded separately.</p> <p>SG100: Landings, discards and incidental mortality are accurately recorded and monitored. Mortality on juveniles is monitored and recorded separately</p> <p>This PI is considered under Condition 6 below.</p> <p>PI 2.1.2.2.</p> <p>SG 80: Information is available to allow estimates of discard and slippage to be calculated and interpreted.</p> <p>SG 100: Accurate and verifiable information (quantity and proportions in terms of species, length/weight and sex) is available on the extent of all discards and slippage, and consequences of these. Or the entire catch is landed.</p> <p>PFA have provided access to observers (see Condition 2), and information from these observers is key in ICES calculations of discard. Observers can record all data related to size etc. PFA have also enacted provisions to record discard of target and other species (Condition 3) and to enact policies against discarding and high-grading (this Condition).</p> <p>The score for this PI is now revised to 85.</p> <p>PI 3B.6.1.</p> <p>SG 80: Fishery operatives are regularly involved in the collection and recording of catch, discard and other information.</p> <p>SG 100: Fishery operatives assist significantly in the collection and recording of catch, discard and other information.</p> <p>This PI is considered under Condition 6 below.</p> <p>Ongoing compliance with the intent of this condition will now be monitored in future as part of annual surveillance audits.</p>
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Item	Comments
5	Condition of Certification 5: Recording of incidental mortality of herring in other North Sea pelagic fisheries
Activity assessed	<p>There is recent evidence that herring may constitute a significant by-catch element of other pelagic fisheries, notably the mackerel fishery. To inform the stock assessment process, PFA should therefore record and report, to <i>bona fide</i> National management and scientific bodies within each country that the PFA Group operate from, the extent of herring by-catch within their mackerel fishery. Catches would either be set against quota (which would be reported under existing systems) or may, under law, be discarded once quota is exhausted.</p> <p>Information on the efficacy of measures employed by PFA to avoid by-catch of herring in their North Sea mackerel fishery (such as the three-frequency echosounder/sonar systems) should be made available to stock assessment and regulatory bodies.</p> <p>Timescale: Procedures to achieve this should be implemented immediately upon certification.</p> <p>Relevant Scoring Indicators: 1.1.2.5, 3B.6.1</p>
PFA Action Plan	<p>PFA will make a written instruction for the skippers. In this instruction skippers are required to fill in part sixteen (16) of the EU-logbook to record incidental mortality of herring in other North Sea pelagic fisheries. Moreover, the PFA initiate scientific research projects aimed at to differentiate between the different pelagic fish species (so called Twinson project). The PFA is also investigating the potential possibility to initiate an echosounder project.</p>
Observations	<p>The conclusions of the previous audit were: “<i>Compliance with the recording of incidental catches of herring element of the Action Plan was behind target and conformance with the PFA instruction was not measurable during the present audit. Data on compliance with this instruction shall be collated by PFA and this issue will now be followed-up during an expedited audit</i>”.</p> <p>The instruction to skippers in the herring fishery to complete part (16) of the logbook has been issued and is being complied with. A similar instruction has been issued to skippers in the mackerel fishery (the other fishery PFA North Sea fishery with a potentially significant herring by-catch), but this fishery does not commence until October.</p>
Conclusion	<p>Compliance with this Condition is considered to be on-target but will not be fully reviewed until objective evidence is available from the PFA mackerel fishery logbook records, to be evaluated at the next annual audit (late 2007/early 2008).</p>

Item	Comments
6	Condition of Certification 6: Ensuring the accuracy of area reporting information
Activity assessed	<p>Within the fishery as a whole, misreporting of the area of capture has been a persistent problem. This is estimated within the stock assessment process (see Indicator 1.1.2.6) at a level considered satisfactory. However, this practice does constitute an area of uncertainty in the stock assessment.</p> <p>It was noted during the assessment that the members of the PFA receive from their vessels regular reporting of catches and points of capture (at least twice weekly). This information should be made available to management and research bodies, on request, in line with the requirements of Condition 1.</p> <p>Timescale: This requirement would apply to all information gathered from the date of certification. Liaison with relevant organisations to establish procedures for transfer of information should be implemented immediately upon certification.</p> <p>Relevant Scoring Indicators: 1.1.2.1, 3B.6.1</p>
PFA Action Plan	<p>The PFA will fulfil this requirement. This information will include the catch and position of catches of each day. Requests of bona fide national management and scientific bodies have to be sent (in written form) to the secretariat of the PFA. The PFA will keep a file of all requests and responses. The PFA would consider taking part in trials with electronic logbooks. This information would then also be made available.</p>
Observations	<p>The conclusions of the previous audit were: <i>“This condition appears to have been complied with on target, but shall be subject to further monitoring in combination with Condition 1 before final review”</i>.</p> <p>The voluntary agreement by the UK fleet (including PFA members) to provide daily reports to UK authorities (DEFRA/SEERAD) on catches, position and the quantity of fish frozen (available, of course in combination with VMS data) remains in force. Data for German vessels includes special control of logbook and VMS data if there is a change in position between fishing divisions. Further PFA information is available on request as per the PFA Action Plan.</p>
Conclusion	<p>The requirements of this Condition have been met.</p> <p>Two Performance Indicators (PI) related to this Condition. These, and related 80 and 100 Scoring Guideposts (SG) are presented below.</p> <p><i>PI 1.1.2.1</i> <i>SG 80: Landings are accurately recorded. Discards and incidental mortality are well estimated. Mortality on juveniles is monitored and recorded separately.</i> <i>SG100: Landings, discards and incidental mortality are accurately recorded and monitored. Mortality on juveniles is monitored and recorded separately</i></p> <p>As reported in the original assessment, all landings (for PFA and the fishery as a whole) are accurately recorded. Mortality of juveniles is also well recorded. These represent, by far, the main sources of fishery related mortality. For the PFA fleet, discards are recorded (Condition 3); this includes issues of PFA recording discards on logsheets and independent observer verification of low levels of discarding (Condition 2). This information is available, including (daily) company records of areas and catches (i.e. area reporting), to scientific and management agencies.</p> <p>For the North Sea herring fishery as a whole, area misreporting and discarding is estimated, is considered sufficient for use in the stock assessment and was reduced substantially in 2006. For discarding, this has included sampling from 2004/05/06 of some of the fleets and is an improvement from the situation during the original assessment in 2003. The score for the fishery as a whole would be considered less than 80. However, actions taken by PFA lead the score for the PFA North Sea Herring Trawl Fishery ONLY being raised. This score would</p>

	<p>therefore not apply to other fisheries.</p> <p>The score for this PI is now revised to 80, and would be higher if PFA actions were mirrored in other fleets.</p> <p><i>PI 3B.6.1.</i></p> <p><i>SG 80: Fishery operatives are regularly involved in the collection and recording of catch, discard and other information.</i></p> <p><i>SG 100: Fishery operatives assist significantly in the collection and recording of catch, discard and other information.</i></p> <p>Through the meeting of Conditions 1, 2, 3, 4 and 6, PFA have demonstrated a clear commitment to provide significant information on catches, discards and other information (e.g. VMS data, carrying observers).</p> <p>The score for this indicator is now raised to 90. This will be subject to further review following resolution of Conditions 5 and 7.</p>
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Item	Comments
7	Condition of Certification 7: Recording of interactions with rare, protected or threatened species
Activity assessed	<p>It is acknowledged during the assessment that interactions of these species with this fishery are very uncommon. Due to the acknowledged rare occurrence of such interactions, these have not been quantified in this fishery.</p> <p>In order to provide reassurance and information, any interactions of the fishery with any rare, protected or threatened species (cetaceans, seabirds, seals, elasmobranches, turtles etc) should be recorded and the effects on the animals concerned described. Recording of such interaction by observers should also be encouraged in line with Condition 2.</p> <p>Timescale: Procedures to achieve this should be implemented immediately upon certification.</p> <p>Relevant Scoring Indicators: 2.2.1.2, 3B.6.1</p>
PFA Action Plan	PFA will make a written instruction for the skippers. In this instruction skippers are required to fill in (record and describe the effects on the animals concerned) the form designed by the PFA.
Observations	<p>The conclusions of the previous audit were: <i>“Compliance with the recording of incidental catches of rare, protected or threatened species was behind target. Data on compliance with this instruction shall be collated by PFA and this issue will now be followed-up during an expedited audit in combination with Condition 1.”</i></p> <p>The completion of forms recording interactions with rare, protected or threatened species was demonstrated during the current audit.</p> <p>This condition remains open, however, pending collation of data by species (e.g. total interactions by species and as a percentage of trips). Data should be provided to appropriate scientific agencies.</p>
Conclusion	Compliance with this Condition is considered to be on-target and will be fully reviewed at the next annual surveillance audit.

Item	Comments
8	Status of stock
Observations	<p>The most recent assessment of the stock in March 2007 indicated an SSB at spawning time in 2006 of 1.2 million tonnes which is a reduction 400,000t compared with the previous year. The stock is at risk of having reduced reproductive capacity and of being harvested unsustainably. The perception of SSB in 2005 was reduced from 1.69 to 1.6 million tonnes. There has now been a succession of five below average year classes following a big year class in 2000. The 2005 year class was the lowest since 1979. Early indications are that the 2006 year class is also below average at 28% of the geometric mean since 1981. Such a sequence of poor recruitment has never been observed before for this stock. As a consequence the stock is expected to remain below the biomass precautionary level of 1.3 million tonnes during 2007 and 2008. Poor recruitment has reduced the catch potential to 40% of the average and will continue to reduce it even further.</p> <p>As noted in 2006 the reasons for the succession of poor recruitment cannot be explained. Annual scientific surveys have shown that North Sea herring larval production has been good, indicating that the spawning has been satisfactory and that there are no issues of egg quality or destruction of spawn on the sea bed. This suggests that the factors which are generating poor recruitment are occurring in the larval phase well after hatching. It is the undisputed opinion of both scientists and the fishing industry that the phenomenon is not related to fishing activities, but that it is environmentally driven. Both sandeel and Norway pout have also suffered from recruitment failure in the North Sea in recent years.</p> <p>As noted in 2006 the possible causes of poor recruitment are numerous and likely to be acting together in a complex manner. Many decades of research have shown that these mechanisms are extremely difficult to understand and almost impossible to predict or quantify. Some of the possible causes of poor recruitment in North Sea herring are listed below, but it must be emphasised that the list is not exhaustive and that the true cause may never be known.</p> <ul style="list-style-type: none"> • Density dependant factors such as high SSB leading to poor larval survival through cannibalism and / or competition for food. (<i>This type of stock and recruitment relationship is known for some species but herring have produced big year classes at high SSB in the past including the 2000 year class</i>). • Changes in the composition of the plankton leading to a poor supply of suitable food items at key life history stages. (<i>It is known that there has been a gradual change, over the past decade, to more southerly species of plankton occurring in the North Sea</i>) • Subtle changes in the physical processes in the North Sea leading to possible changes in speed and direction of residual currents affecting natatory drift to suitable nursery areas. • Anthropogenic factors such as gravel dredging which could reduce the areas of suitable substrate on which herring depend for spawning. <p>An ICES Study Group in 2007 commented that recent trends in herring recruitment are similar to the warming of the water on the spawning grounds and changes in hydrography. A recent ICES Herring Assessment Working Group report also noted that temperatures in the eastern and northern part of the North Sea were much warmer (1-3oC) than the average of the last 50 years. These changes are also associated with observed changes in the zooplankton community.</p> <p><u>The assessment in 2007</u></p> <p>The TAC of 455,000t for 2006 included a sub-TAC of 50,000t for Divisions IVc/VIIId. For 2007 paragraph 6 of the EU / Norway agreement was invoked. As a result the TAC was, after discussions with the Pelagic RAC, reduced by 25% to 341,000t, including a sub-TAC of 42,500t for IVc/VIIId plus a by-catch ceiling of 32,000t.</p> <p>Catches in the North Sea human consumption fishery (fleet A) in 2006 were 498,000t which was 119,000t less than in 2005. It was an overshoot of the TAC by 43,000t (+9%). In 2005 the TAC overshoot was 83,000t (+16%). Most of this excess is now taken in Divisions IVa and IVb. In the past much of the excess catch was taken from Divisions IVc/VIIId (Downs stock)</p>

but after the introduction of a sub-TAC for this area the situation did improve. However in 2006 there was an overshoot of 6,600t (+13%), of the sub-TAC in this area, which is a worrying new trend. The Downs stock has now returned to its pre-collapsed state but is dominated by one year class therefore there is a need for extra caution.

By-catches in the North Sea small meshed fishery (fleet B) were 11,900t in 2006 which was well below the by-catch ceiling of 42,500t.

Misreporting of landings in the stock assessment (i.e. taken in the North Sea, but reported from other areas such as IIa, IIIa and VIaN) decreased to 19,000t in 2006 compared with 58,000t in 2005, although both estimates were based on limited information. The reduction in 2006 was the result of tougher enforcement measures and possibly a greater willingness on the part of industry to comply.

Only a very small fraction of the fleet was sampled for discards, therefore the resultant estimates are poor. In 2006 raised estimates from just two fleets indicated a reduction in discarding to 2,000t compared with 17,000t and 13,000t in 2004 and 2005 respectively. The fishing mortality on adults (2-6wr) for 2005 was revised upwards from F0.35 to F0.37. In 2006 it reduced slightly to F0.35. Fishing mortality on the juveniles (0-1wr) remained low at F0.08 compared with the target Fmax of 0.12.

ICES Advice for 2008

The ICES advice for 2007 was based on the requirement to achieve a spawning stock biomass at or above the Bpa level of 1.3million tonnes by 2008. Given the current sustained low level of recruitment, ICES considers that using the current Bpa as Btrig (action point) may be unrealistic. For 2008 it is considered preferable to look at the management plan as a whole rather than using a Bpa reference point which may not be achievable under the current environmental conditions. With the current low recruitment the medium term predictions are for SSB to fluctuate around 1.1million tonnes but only provided that F is kept at the present recommended harvest control levels. Under these circumstances it should be possible to maintain annual catches, of North Sea autumn spawners, at around 200,000 to 240,000t. This prediction is conditional upon there being no overshoot of the TAC either through misreporting, discarding or other means.

Because of enforcement and management issues, exploitation has been well above the recommended harvest rate for the last three years. If this continues then the stock is likely to fall below B_{lim} of 800,000t in 2009.

The revised management plan, for 2008 is aimed at bringing the target F_{2,6} in line with the harvest control rule and implies an F_{2,6} 0.17. If the 15% rule were applied (paragraph 5 EU/Norway agreement) then the SSB in 2008 would remain well below Bpa and would further decline in 2009 close to B_{lim}. As a consequence ICES recommends invoking paragraph 6 of the agreement, allowing a greater than 15% reduction in the TAC for 2008. This implies a TAC for the human consumption fishery (fleet A) of around 175,000t in 2008.

Investigation of the spawning biomass limit reference point for North Sea autumn spawning herring, by an ICES Workshop in 2007, concluded that the current level (800,000t) should be maintained.

The advice for 2008 is based on a series of six options including a complete ban on all directed fishing for herring which is the only option which would return SSB to above Bpa of 1.3mt by 2009. The options are based on the TAC constraint in 2007 plus an overshoot of 10% resulting in an F adult of 0.34. It is also assumed that, as in recent years, not all the by-catch of herring (fleet B), will be taken.

The different predicted catches result from different options for fleets C and D in Division IIIa (not shown)

Options 3, 4 and 5 are not considered to be consistent with the management plan. The plan

implies a 50% reduction in the TAC relative to 2007 corresponding to a total catch of North Sea autumn spawners of 200,000t (fleets A-D) and a fleet A catch of ca.175,000t.

Option	F adult	F juv	Catch fleet A '000t	Catch fleet B '000t	SSB 2008 '000t	SSB 2009 '000t	fleet A TAC reduction
1	0.168	0.076	171.9	8.7	1025.3	995.5	50
2	0.167	0.076	174.1	15.5	1028.0	999.8	49
3	0.292	0.078	289.9	8.7	944.2	821.9	15
4	0.289	0.077	289.9	15.4	946.3	829.0	15
5	0.172	0.075	175.7	8.7	1022.9	990.4	49
6	0	0	0	0	1147.4	1309.9	100

The current management plan has been evaluated and is considered 'precautionary' because the risk of SSB falling below Blim (800,000t) in the medium term is less than 5% when:

- There are no year to year restrictions on changes in the TAC
- Current low levels of recruitment continue
- Implementation is constrained to give less than a 10% TAC overshoot.

EU/Norway agreement

The EU Norway agreement for the management of North Sea autumn spawning herring (below) embraces all the aspects of the Precautionary Approach and in particular the provision in rule 6 to permit managers to reduce the TAC by more than 15% when appropriate. The text of the agreement is as follows:

- 1. Every effort shall be made to maintain a level of Spawning Stock Biomass (SSB) greater than the 800,000 tonnes (Blim).*
- 2. Where the SSB is estimated to be above 1.3 million tonnes the Parties agree to set quotas for the directed fishery and for by-catches in other fisheries, reflecting a fishing mortality rate of no more than 0.25 for 2 ringers and older and no more than 0.12 for 0-1 ringers.*
- 3. Where the SSB is estimated to be below 1.3 million tonnes but above 800,000 tonnes, the Parties agree to set quotas for the direct fishery and for by-catches in other fisheries, reflecting a fishing mortality rate equal to:
0.25(0.15*(1,300,000-SSB)/500,000) for 2 ringers and older, and
0.12 (0.08*(1,300,000-SSB)/500,000) for 0-1 ringers.*
- 4. Where the SSB is estimated to be below 800,000 tonnes the Parties agree to set quotas for the directed fishery and for by-catches in other fisheries, reflecting a fishing mortality rate of less than 0.1 for 2 ringers and older and less than 0.04 for 0-1 ringers.*
- 5. Where the rules in paragraphs 2 and 3 would lead to a TAC which deviates by more than 15% from the TAC of the preceding year the Parties shall fix a TAC that is no more than 15% greater or 15% less than the TAC of the preceding year.*
- 6. Notwithstanding paragraph 5 the Parties may, where considered appropriate, reduce the TAC by more than 15% compared to the TAC of the preceding year.*
- 7. By-catches of herring may only be landed in ports where adequate sampling schemes to effectively monitor the landings have been set up. All catches landed shall be deducted from the respective quotas set, and the fisheries shall be stopped immediately in the event that the quotas are exhausted.*
- 8. The allocation of TAC for the directed fishery for herring shall be 29% to Norway and 71% to the Community. The by-catch quota for herring shall be allocated to the Community.*
- 9. A review of this arrangement shall take place no later than 31 December 2007.*

	All prediction are based on average recruitment over the recent poor years only, a precautionary approach to projected stock status that is supported by the industry through the Pelagic Regional Advisory Council (PRAC)
Conclusion	<p>The conclusion of the previous surveillance report was: <i>“Quite clearly a precautionary approach needs to be followed. This needs to be backed by rigorous enforcement measures to address misreporting and under-reporting. For the PFA component of the fleet, this need is also to be met through the meeting of conditions outlined above.</i></p> <p><i>There is a clear need to try to understand the reasons behind the current succession of poor year classes. In this context ICES, supported by recommendations of the RAC, are active in promoting relevant investigations.</i></p> <p><i>It is accepted that the poor recruitment in herring is not the result of fishing activities and that it is unlikely to be the result of any other anthropogenic influences.</i></p> <p><i>It should be noted that the industry, through the PRAC have accepted a conservative approach to future assumptions about stock status and accept, that for the time being, predictions must be based on the likelihood of continuing poor recruitment.</i></p> <p><i>See item 9 below”</i></p> <p>These conclusions remain valid. Management and PFA actions are considered below.</p>

Item	Comments
9	Management responses to changes in stock status
Observations	<p>The previous audit report concluded that <i>“It is noted that when last assessed in March 2006 the spawning stock remained well above the biomass precautionary limit of 1.3 million tonnes and was predicted to be <u>at</u> Bpa in autumn 2006, the time of the present audit. In terms of the Performance Indicators and Scoring Guideposts used in the original assessment of this fishery (notably Performance Indicator 1.1.6.1), the fishery therefore still achieves a level of 80.”</i> And that ... <i>“As discussed above, a lack of progress in meeting certain of the Conditions of Certification means that an expedited audit of the fishery is required. In light of the urgent need to review the next (latest) stock assessment outputs, this additional audit shall also be used to evaluate:</i></p> <ul style="list-style-type: none"> • <i>the latest assessment results (including 2006 recruitment indices)</i> • <i>ACFM advice</i> • <i>PFA’s position in relation to the assessment results and ACFM advice</i> <p><i>To allow the above management factors to be evaluated (these representing a potentially major change in the fishery), this expedited audit is planned to take place early in June 2007.</i></p> <p><i>If the 2007 stock assessment (to be evaluated in the expedited audit in June 2007) predicts the stock falling below Bpa (i.e. 2006 recruitment is again poor), then Moody Marine would need to carry out a limited assessment of Performance Indicators relating to stock status. This could lead to the requirement to raise further conditions of certification. Clearly, continuing poor recruitment will require further significant and precautionary reductions in the TAC, such as to allow the stock to be rebuilt to a specified level, consistent with the precautionary approach, and within a specified time frame, as required under MSC Principle 1, Criterion 2.”</i></p> <p>Continuing poor recruitment has now resulted in the stock falling below Bpa. Therefore, as indicated in the previous report, there is now a need to implement further significant and precautionary reductions in the TAC, such as to allow the stock to be rebuilt to a specified level, consistent with the precautionary approach, and within a specified time frame, as required under MSC Principle 1, Criterion 2.</p>
Conclusion	<p>The stock is now predicted to have fallen below Bpa, but to be above Blim. Performance Indicator 1.1.6.1. now needs to be re-scored. The text of the PI and SG’s is as follows:</p> <p>PI 1.1.6.1: Is the stock(s) at or above reference levels for SSB and F?</p>

<p>[YES - Criteria 1 is complete. NO - Answer Criteria 2]</p> <p>SG 60: The stock is close to the limit reference levels. SG 80: The stock is above the precautionary reference levels</p> <p>The score for this PI is therefore re-scored to 75. As the stock is no longer above Bpa, MSC Criterion 1.2 must be invoked. The text of the PI and SG's is as follows:</p> <p>PI 1.2.1: If the stock is below the precautionary reference point, are measures to rebuild the stock specified?</p> <p>SG60: Appropriate rebuilding measures through reduction in exploitation exist and are being implemented. Rebuilding measures other than reduction in exploitation are being considered. Measures have not been tested. SG80: Appropriate rebuilding measures are being implemented to promote recovery within reasonable time frames. Measures have been tested and can be shown to be rebuilding the stock. SG 100: Appropriate rebuilding measures are being implemented to promote recovery as quickly as is possible. Additional measures are being implemented to prevent problems in the future.</p> <p>Measures to rebuild the stock, through reductions in TAC in excess of the HCR (i.e. over 15%) exist and have been implemented in 2006 and recommended again in 2007. The success of such rebuilding measures has been demonstrated during previous stock recovery episodes in the 1970's and late 1990's, although in the current situation, the poor stock status is due to environmental rather than fishing pressures. The current situation with recruitment is not due to fishing mortality, but environmental factors, and these are under investigation.</p> <p>However, there is currently no projection or plan of the level of fishing mortality required to attain Bpa within an appropriate timeframe under average recent levels of recruitment.</p> <p>The score for this PI is therefore 75.</p> <p>According to MSC requirements, we are also required to re-score Performance Indicator 3A.3.4. The requirements of this indicator are: 3A.3.4. Do objectives and operational procedures follow the precautionary approach? SG 60: Some objectives and procedures implement a precautionary approach. SG 80: Key objectives and procedures explicitly implement a precautionary approach.</p> <p>Inconsistent application of the precautionary approach has led to re-scoring of this PI to 70.</p> <p>As the score for PI 1.1.6.1, 1.2.1 and 3A.3.4 are below 80, we are required to raise a new condition of certification (Condition 8). This Condition, which addresses all three PI's, is as follows:</p> <p>Condition 8. Rebuilding Measures</p> <p>Action required: PFA should seek, through best available scientific sources, development of a recovery plan/scenario which would return the stock to Bpa over a reasonable time frame (usually the time frame of the certificate, unless under 'Exceptional circumstances'). The basis for the time frame chosen should be explained.</p> <p>Requests for development of the plan should be made before the next audit, scheduled for late 2007/early 2008.</p> <p>It is recognised that Bpa may be subject to review by ICES and that this may alter the basis for the rebuilding plan.</p> <p>Once provided, PFA should support the implementation of this plan at appropriate fora.</p>
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	<p>As required by the MSC standard, any TAC's adopted prior to identification of the requirements of a recovery plan/scenario shall use best available information and a precautionary approach.</p> <p>The plan should be implemented and have recovered, or be shown to be on schedule to recover the stock, in line with the recovery plan/scenario, by the fourth annual audit.</p> <p>Timescale: PFA to request a rebuilding plan within 2007. Plan to be implemented by fourth annual surveillance audit.</p> <p>Relevant Scoring Indicators: 1.1.6.1, 1.2.1, 3A.3.4</p>
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10	<p>Overall Conclusions</p> <p>PFA have taken appropriate measures to address the conditions of certification raised during the MSC certification assessment. This can be summarised as follows:</p> <ol style="list-style-type: none"> 1. Conditions where requirements are deemed to have been fully met and the condition closed: <ul style="list-style-type: none"> • Conditions 1, 2, 3, 4, 6 2. Conditions which are considered to be on-target and which will be subject to full review at the next surveillance audit: <ul style="list-style-type: none"> • Conditions 5, 7 <p>As a result of actions taken by PFA to address these conditions, three relevant Performance Indicators have been reviewed and scores raised as follows: PI 1.1.2.1 – 80 PI 2.1.2.2 – 85 PI 3B.6.1 – 90</p> <p>However, the continuing poor recruitment to the North Sea herring stock, and the current absence of a recovery plan/scenario means that a number of other Performance Indicators must be re-scored. Relevant PI's and adjusted scores are as follows: PI 1.1.6.1 – 75 PI 1.2.1 – 75 PI 3A.3.4 – 70</p> <p>As these three scores now fall below 80, a new condition has been raised, as detailed in Section 9 above.</p> <p>The overall scores for the MSC Principles are now re-calculated taking into account all of the above amendments. Scores are: Principle 1: 84 Principle 2: 89 Principle 3: 88</p> <p>MSC Certification should therefore continue, subject to satisfactory compliance with outstanding conditions, and surveillance audits continue to the same schedule.</p>
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Information Sources:

Meetings

1. PFA. 10-11 July 2007.
2. IMARES (teleconference). 18 July 2007.
3. North Sea Foundation (teleconference) 18 July 2007.

Reports etc

1. ICES (2007) Report of the Advisory Committee on Fishery Management ICES ACFM.
2. ICES (2007). Report of the Herring Assessment Working Group for the Area South of 62°N. ICES C.M.
3. IMARES letter to PFA re CAFÉ project, 27 July 2006. PFA letter to IMARES 7 June 2007.
4. Pelagic RAC letter to ICES requesting stock scenarios. 27 April 2007
5. Pelagic RAC letter to ICES with Request for reassessment North Sea herring reference points. 5 June 2007 and ICES response of 6 July 2007.
6. PRAC presentation on North Sea herring.

Standards and Guidelines used:

1. MSC Principles and Criteria for Sustainable Fishing
2. MSC Fishery Certification Methodology Version 6. September 2006
3. TAB Directive 4



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Subject: condition 8 on Rebuilding Measures
Date: 14 augustus
Our reference: PFA2007010/6.1/GB/TH

Dear Andrew,

Resulting from the latest MSC audit on our North Sea Herring fishery (in July) Moody Marine has formulated a new condition 8 on Rebuilding Measures in which the PFA should seek, through best available scientific sources, development of a recovery plan/scenario which would return the stock to Bpa over a reasonable time frame.

On behalf of the PFA I have contacted the Dutch marine research institute IMARES if they were prepared to produce for us such a rebuilding plan / rebuilding scenario. The answer was positive and the expected work can be carried out by IMARES between September and November this year. Consequently I have commissioned IMARES to prepare a rebuilding plan / rebuilding scenario to be delivered not later than November 2007.

The rebuilding plan / scenario will be based on the following:

1. rebuilding to SSB at Bpa level.
2. within a reasonable time frame (the basis of which will be explained)
3. two recruitment levels:
 - a. continuing recruitment on the average level of the last 5 years, and
 - b. continuing recruitment on the average level of the last 30 years.

The plan will adopt a precautionary approach to these scenarios of recruitment, however.

PFA will support the implementation of this plan in the appropriate fora.

I trust this planned action is fully in line with the new Condition 8.

Kind regards


Gerard van Balsfoort
President Pelagic Freezer-trawler Association