

Fischereischutzverband Schleswig-Holstein e. V.

Wolfgang Albrecht \*23611 Bad Schwartau \* Schmiedekoppel 53

Bad Schwartau, 17.6.2020

**BSAC Secretariat**

by hand Mrs. Sally Clink

By email: [sc@bsac.dk](mailto:sc@bsac.dk)

**Comments to the draft Recommendations on WG ( Demersal + Pelagic) meeting from 9./10.June 2020**

Reference: email from 10.6. 2020

Dear Sally

Additional to my email from 10st of June and my comments and contributions during the meeting i´d like to state as follows:

**Fisheries Protection Associations joint statement on handling the cod crisis in the Baltic Sea**

**General summary**

The cod stock in eastern Baltic Sea has collapsed, as reflected in the latest ICES advice for this important stock. As for 2020, ICES advises that, when the precautionary approach is applied, there should be zero catch in 2021. Small, and skinny cod more or less useless to fish commercially for human consumption is now what is left. With little prospect of improvements in the short to medium term, dramatic conservation and management measures are needed and a clear understanding among all parties must be that such measures must be kept in place for a long time

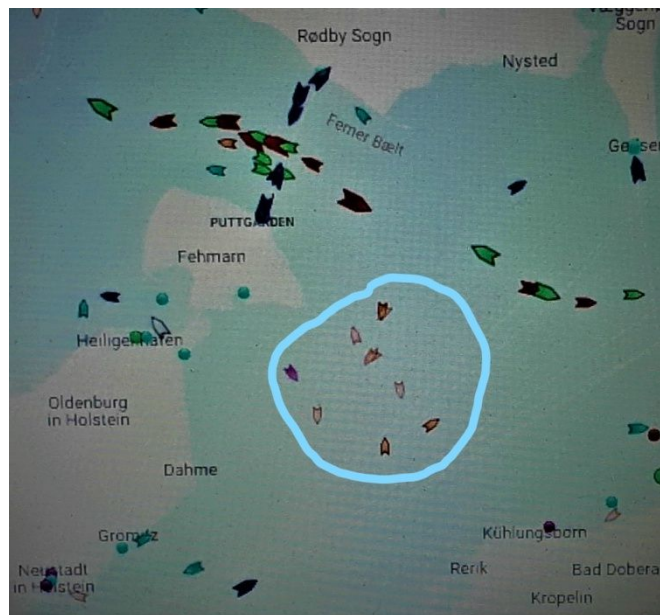
We support the measures aiming to recover the cod stock, measures **including the closing of all trawl fishing, for spawning protection during the spawning season at times, in all areas where spawning occur to avoid the disturbance of spawning concentrations and strengthened control measures.**

## In detail

Furthermore, we think further measures are needed to improve chances of strengthening a cod recovery and to safeguard a low impact coastal fishery:

- Temporary closures of all cod spawning areas during the spawning season - for all types of trawling, all year around, using the Basic Regulation 2013/1380 article 8 as the legal basis
- An extended spawning closure in SD 22 from first of January to end of March to prevent a concentration of catch activities like in January 2020 ( see below) in this small area from all the other closed areas to protect the only strong year class 2016.

( more than 5 big Danish trawlers had been fishing every day during the whole month)



( Google ships radar, 27<sup>th</sup> of January 2020)

- Focus on the importance of maximized food availability for the cod like sandeel, Herring, Sprat and small crabs. Trials conducted recently where cod were fed with herring show, that, if fed, they grow fast and are healthy. (ADD REF IF ANY to SLU study)
- Management of the seal population to decrease the further distribution of parasites ( avoidance of liver worm on cod, whereby the growing up will be effected negative)
- Assessment on skinny cod about the influence of parasites in this matter and of the development and recovery of the cod stock.
- Pelagic fishing activities must be reconsidered in light of the ecosystem needs and must be reduced and moved away from the coastal waters and the spawning areas.
- Increasing of Control on false declaration of catch in the pelagic fishery ( herring and sprat)
- Current and planned efforts to save or uphold investments in fishing must be focused on supporting measures to fishing operations that fish for human consumption, prioritizing those with least environmental impact.

For the upcoming fishery council, a few issues are crucial for the Member States to consider:

Firstly, the proposed allocation of cod bycatch quota for 2019 set at 2000t for the areas 25-32 must be allocated on the basis of Article 17 of the CFP. I.e. based on criteria of an environmental, social and

economic nature, and to fishing vessels deploying selective passive fishing gears with reduced environmental impact such as the coastal low impact fishery. Ministers must note that pelagic fishing activities will take a considerable part of this quota due to their bycatch of cod. Also, if allowed at all, a flatfish fishery using demersal trawls will, according to ICES special advice of cod bycatch ([from December 2019](#)), catch cod and such bycatch may be considerable outside of the spawning season on cod. If allowed to do so, the above two fisheries may thus quickly take a large share of the bycatch TAC and by that close the entire coastal fishery around the Baltic.

Secondly, the proposed and decided measures for cod for 2020 concluded at the October Council 2019 meeting includes a spawning closure for area 24. While we agree and support a separate closure period for areas 22-23 and 24, we must point out that the timing for this closure in area 24 must be reconsidered. The closure should cover April-June to be better aligned with spawning times in this area. The closure in SD 22 has to be extended from 1st of January to 31st of March to prevent a movement of catch activities in this area like in 2020.

Sincerely

A rectangular box containing a handwritten signature in blue ink. The signature is written in a cursive style and appears to read 'Wolfgang Albrecht'.

( Wolfgang Albrecht, Chairman )