



- European Commission
- Member States around the Baltic

Date: 4<sup>th</sup> July 2008

**Subject: BS RAC recommendations on the fisheries for Baltic Sea fish species in 2009.**

Please find enclosed the BS RAC recommendations on the fisheries for Baltic Sea fish species in 2009.

The BS RAC would like the Commission and Member States to take into account the BS RAC position when preparing and finally deciding on the regulation of the Baltic Sea fisheries in 2009.

Yours sincerely,

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Chairman of the BS RAC

c.c. Fisheries Council of the European Community, the European Parliament, The Community Fisheries Control Agency, The Commission's Advisory Committee on Fisheries and Aquaculture (ACFA), The International Council for Exploration of the Sea (ICES) and The Helsinki Commission (HELCOM).

# Recommendations

on the fisheries for Baltic Sea fish species in 2009

June 2008

This paper contains the BS RAC recommendations on the fisheries for Baltic Sea fish species in 2009. The recommendations have been prepared by the three BS RAC working groups (demersal, pelagic and salmon/sea trout) and have been finalized and approved by the Executive Committee at its meeting on 17<sup>th</sup> June 2008 in Riga.

## 1. DEMERSAL SPECIES

### 1.a. Evaluation of the cod management plan

The BS RAC finds it surprising that ICES has not found the time to evaluate the management plan for cod in the Baltic. The plan is almost a year old and the target values – lower than the precautionary reference points ICES has previously used – are all lifted out from ICES recommendations. The members of the Baltic Sea RAC are disappointed that because ICES is unable to evaluate the management plan, the advice for cod in the West is based solely on outdated biological reference points and a mechanistic (as opposed to thoughtful) approach to the provision of advice.

### 1.b. Cod in Subdivision 25-32

The RAC is pleased to see that ICES now assesses the Eastern cod stock as improving. The reduced fishing mortality is partly a result of the growing stock, but also a result of the reduced fishery – in particular the unreported fishery. This is good news.

The Baltic Sea RAC therefore recommends that the management plan be followed. This will imply an increase in the TAC of 15% - to 44,580 tonnes.

The fishing mortality that corresponds to this TAC is close to 0,25 – far below the target mortality of 0,3. A reduction in fishing days is therefore not required.

### 1.c. Cod in Subdivision 22-24

It puzzles the members of the RAC that this stock is not performing better than presented in the latest assessment from ICES. The stock has, for a number of years, been above what used to be the precautionary reference point, and yet it has failed to produce good or even average recruitment in those years. This is even more peculiar as the Eastern stock (much more

susceptible to environmental changes) has yielded fairly good recruitment in the same years. Many members of the RAC therefore question the results of the assessment – in particular the assumption that recruitment is below average. Oddly, ICES has not elaborated on the relevance of Bpa for this stock, contrary to what has been the case for other stocks in the Baltic.

Given this unfortunate situation, the BS RAC is not able to give a unanimous recommendation for the time being. The majority of the members of the RAC are of the opinion that the agreed management plan should be followed – regardless of whether it is evaluated by ICES or not. A minority is not prepared to recommend this without a positive assessment by ICES.

The latter position leads the representatives of the industry to call for a roll over of the cod TAC for the Western stock. This is done with particular reference to the doubts regarding the assessment of the recruitment, but also to the fact that the advice from ICES refers to a reference point that has been retained for some unclear reason.

The environmental organisations support the ICES advice that the TAC should be reduced by 28%, which corresponds to landings of 13,700 tonnes in 2009.

A common position is nevertheless within reach, if ICES – as suggested in the report from ACOM – is able to present an evaluation during the summer 2008. Provided this evaluation is positive as regards the sustainability of the management plan, the BS RAC is of the unanimous position that the TAC should be set according to the plan.

Provided no new information on the status of the stock is available, the TAC for cod in the Western Baltic should be set at 16,338 tonnes – corresponding to a reduction of the 2008 TAC of 15%.

#### **1.d Other issues on cod**

The BS RAC has discussed a number of other issues in relation to the management of the demersal fisheries:

##### **1.d.i. Derogation**

The RAC is of the impression that the regulations to protect cod have to too great an extent had unwanted side-effects on other fisheries. The RAC therefore proposes that an exemption from the general ban on using mesh sizes above 90 mm in April in the West and in June to August in the East be introduced for vessels using gill nets with large mesh sizes e.g. mesh sizes at or above 220 mm, which are used to catch turbot and lumpfish and which have no catches of cod. All fishing trips should be subject to pre-notification as regards the cod-fishery, but effort days should not be deducted and the pre-notification could also include fishing areas.

#### **1.d.ii. Selectivity of demersal trawls**

The RAC is also of the opinion that further research into the selectivity of the fishing gear used in the demersal fisheries, mainly the BACOMA window, be given high priority. The selectivity of the currently allowed trawling gears (BACOMA and T90) is not satisfactory and the BS RAC finds it urgent that possibilities be investigated to improve the selectivity of those gears. The BS RAC recommends that the Commission and Member States, together with the fishing industry, organise a swift research programme with a reference fleet of at least five fishing vessels from each country in order to have sound basis for improved trawling-gears during 2009. BS RAC recalls that such a revision was part of the previous decisions taken by the IBSFC.

#### **1.d.iii. 8% tolerance rule of logbooks**

Since all cod must be weighed on landing and the results of this weighing are available for the fisheries control authorities to count against the quotas, the 8% tolerance rule of logbooks is superfluous. It has no other effect than to render many fishing activities illegal – simply because it is a matter of luck whether an amount of cod entered in the logbook is within the tolerance limits.

#### **1.d.iv. Flexibility between management areas**

It is a well known fact that the delimitation between the Western and the Eastern cod stocks in the Baltic Sea, set at the line between Subdivisions 24 and 25, is more of a theoretical than absolute nature. Cod do move between the two areas – although there is only little doubt that the Baltic Sea hosts two cod stocks. The BS RAC calls for a debate on how to regulate the fishery in a way that better accommodates this fact. In that context the RAC sees the need for a scientific evaluation of the two stock management area scenarios (1 management area versus two management areas).

#### **1.d.v. Flatfish fishery with 140-220 mm mesh**

The BS RAC recommends that the Commission, in parallel to assessing the amount of cod fished in areas 28.2, 29 etc. in view of the fishery in 2009, also investigates via the Member States and then assesses how the present derogation allowing vessels below 12 m in length to fish a limited number of days during the closed seasons is working and what amount of cod has been fished under that particular derogation, and make proposals based on the findings.

#### **1.e. Other demersal species**

For the remaining demersal species that are regulated through TACs in the Baltic Sea (turbot, plaice, and flounder), the Baltic RAC recommends that the TACs in 2009 remain the same as in 2008.

This is recommended as there is no advice from ICES to reduce the fishery, and there are no signs in the fishery to indicate a change in the stocks.

## **2. PELAGIC SPECIES**

### **2.a. Herring in Subdivisions 22-24**

The assessment from ICES regarding herring in Western Baltic considers the spawning stock as being stable, but with low recruitment. There are no agreed reference points for spawning stock biomass or for fishing mortality.

Surprisingly, on this very thin knowledge basis, ICES has the audacity to base the advice on an MSY target for the management of the stock. This is indeed surprising, as herring stocks in particular have demonstrated an inability to produce good recruitments, despite high spawning stocks.

The majority of the BS RAC cannot accept a reduction of the proposed magnitude, without any discussions of the objectives. Simply to jump, in a single year, from a management based on assumptions of precautionary levels to an MSY target management – is not even remotely sustainable.

The low recruitment – if indeed permanent – is most likely a consequence of environmental changes. In the long run, the fishery certainly has to adjust to the failing recruitment, but the stability of the spawning stock over the last 15 years clearly demonstrates that there is no urgency. A gradual approach is absolutely responsible, allowing the fishing industry to adapt to the new situation.

The TAC for herring in the Western Baltic in 2009 should therefore not be reduced by more than 15% of the TAC for 2008. This will give a TAC of 37,868 tonnes.

A minority<sup>1</sup> of the BS RAC recommends a TAC of 18,400 tonnes (-59%) based on the ICES advice, and in particular because the recruitment and SSB for this stock is currently at its lowest observed level and a management plan for the stock is not in place.

### **2.b. Herring in Subdivisions 25-29 and 32 (excluding 28.1 (Gulf of Riga))**

The BS RAC recommends a roll-over of the TAC (152,630 tonnes). According to ICES, the fish stock is fished in a sustainable way and at a historic low fishing mortality.

### **2.c. Herring in Subdivision 28.1 (Gulf of Riga)**

The BS RAC recommends a roll-over of the TAC (36,094 tonnes). ICES classifies the stock to be harvested in a sustainable way.

### **2.d. Herring in Subdivisions 30-31**

The BS RAC recommends a roll-over of the TAC (87,020 tonnes). There has been a decrease in herring growth and this is probably related to the increase in herring density (food

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<sup>1</sup> The Fisheries Secretariat, WWF and Coalition Clean Baltic

limitation problem). This was the main background for the TAC decision for the year 2008. In the assessment for 2008 ICES also states that with the present low exploitation level it is expected that the dioxin concentration in the fish caught will increase, as the amount of older herring (which have higher accumulated amounts of dioxin) will increase in the stock and in the catch. For these reasons the TAC should also be maintained in order to reduce these density-dependent effects. ICES has no new assessment for the stocks this year, but the stock appears to be stable. Both SSB and F are within precautionary levels and the stock is classified as being harvested sustainably.

### **2.e. Sprat in Subdivisions 22-32**

A majority of the BS RAC<sup>2</sup> recommends a TAC of 386,318 tonnes (-15%).

Stability in the annual fishing opportunities should be a key objective of the management of fish stocks in the Baltic. With the current stock situation, the BS RAC sees no strong arguments to reduce the TAC by more than 15%.

The stock is basically considered in a good condition, which is reflected in a stock biomass which is more than 3 times the historic reference level (Bpa).

The BS RAC would like to express its concern about the uncertainty in the surveys and the ICES assessment of stock which eventually results in big annual changes in the advice from ICES.

A minority of the BS RAC<sup>3</sup> recommends a decrease of the TAC by 40% based on the ICES advice and in particular on the reduction in the recruitment.

## **3. SALMON**

### **3.a. Salmon in Subdivisions 22-31**

The BS RAC recommends a roll-over of the TAC for 2009 (364,392 specimens (EU-TAC) while awaiting the introduction of a new management plan.

Last year, the BS RAC recommended a decrease of the TAC due to, and only due to, new statements in the ICES advice of 2007 of only 1-6% at sea survival of wild salmon. Later knowledge shows another situation, and the figures are altered to 10-15%. Both the "other interest group" and the fishing sector agree that the TAC will not have any influence on the catches in 2009.

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<sup>2</sup> All members except those listed in footnote 3.

<sup>3</sup> The Fisheries Secretariat, WWF and Coalition Clean Baltic

### 3.b. Salmon in Subdivision 32

A majority of the BS RAC<sup>4</sup> recommends a roll-over of the TAC i.e. an EU quota of 15,419 specimens.

The salmon fisheries in the Gulf of Finland are based on reared salmon. The catch depends on the success of the released reared smolt and the extent to which salmon are harvested in the Main Basin. Following the driftnet ban it is estimated that more salmon will return to the release sites in the Gulf of Finland. As a consequence it is necessary to allow for an in-year amendment of the TAC in order to cater for larger catches following the effects described above.

The BS RAC agrees with ICES that fisheries should only be permitted at sites where there is no chance of taking wild salmon. In its advice ICES highlights the need to avoid catches of wild Estonian salmon in 2008. However, wild Russian salmon from river populations with weak stocks should also be included.

The BS RAC recommends that separate salmon river management plans should be developed for each of the Estonian salmon rivers. These will for example include measures to control poaching.

One organisation<sup>5</sup> could not agree on a roll-over of the TAC, but recommended a reduction of the TAC by 25%. The organisation has been arguing that the salmon stock in the Gulf of Finland is outside safe biological limits and there are strong indications based on the life history parameters and fishery characteristics that current levels of fishing are unsustainable. No fin-clipping of released salmon is applied in Finland and Russia, which means that it is not possible to distinguish between wild and released salmon in landings of salmon in the Gulf of Finland.

One organisation<sup>6</sup> supported CCB in principle on the management of salmon in Subdivision 32, but chose to abstain from a position as the CCB position arrived at such a late stage.

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<sup>4</sup> All members except Coalition Clean Baltic. The Fisheries Secretariat abstained from voting

<sup>5</sup> Coalition Clean Baltic

<sup>6</sup> The Fisheries Secretariat