

The BSAC input to the meeting with the Commissioner on 5th December 2022

Representatives from BSAC: Executive Committee Chair (Jarek Zielinski), EBM WG Chair (Nils Höglund) standing for Executive Committee Vice-Chair (Glenn Douglas)

In the contribution of the Baltic Sea Advisory Council to the roundtable discussion ahead of the AGRIFISH Council meeting on 12-13 December 2022 we would like to highlight two topics particularly relevant to the Baltic Sea fisheries management. These are two migratory - shared stocks, the western Baltic spring spawning herring and eel, which are exploited by fisheries, in the Baltic Sea and also in the Atlantic.

I. Western Baltic herring

For the BSAC, the issue at stake pertains to management choices. The EU Baltic Sea MAP applies to herring in ICES subdivisions 22–24 and is therefore limited, exclusively, to the Baltic, not taking into account the adjacent waters.

As pointed out by Director General Charlina Vitcheva, in DG MARE's reply to the BSAC letter: *the final report of the joint EU-UK -Norway working group on the management of the North Sea autumn spawning (NSAS) herring stock shows the important intermixing of western Baltic herring with NSAS herring in the Skagerrak and eastern North Sea. It is estimated that about 80% of the catches of western Baltic herring are now occurring in the Skagerrak and North Sea. This evidence calls for strong action from all parties involved.*

The EU Baltic Sea MAP plan has not been adopted by Norway and therefore is not used as basis of the advice for this shared stock.

The BSAC recommends a twofold approach to the management of this stock;

- **In the short term**, the BSAC agrees that:
 - the Multi Annual Plan for the Baltic Sea should be used as a rebuilding plan for the **western Baltic spring spawning herring**
 - it can be the guiding tool for the management of this stock for now.
- **In the midterm**, the BSAC recommends that a specific **rebuilding plan** be prepared and discussed with the third countries. The BSAC exchanged letters with the Commission on this topic¹ that now seems stalled. In her reply to the BSAC, Director General declares that the EU will continue to base its long-term strategy for western Baltic herring on the EU MAP for the Baltic Sea, **OR** on any future rebuilding plan that may be developed in collaboration with the Members States and the sector.

In the context of this declaration, the BSAC reiterates its recommendation that a specific **rebuilding plan** be prepared in cooperation with Norway. ICES work through its workshop guidelines and methods for the evaluation of rebuilding plans could be useful for this purpose.

¹ <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-on-western-Baltic-herring>

2. Eel

The BSAC produced a recommendation in May 2022 on how best to implement the ICES advice for eel. The BSAC is in consensus that the eel stock is in a serious state and that further measures must be taken. Eel management is a complex issue which goes far beyond commercial and recreational fisheries. The BSAC calls for a stronger focus and a faster pace in implementing national measures with respect to anthropogenic, non-fisheries-related sources of mortality. The BSAC considers that:

All anthropogenic threats to the European eel need to be addressed with urgency, not just fishing mortality, but also other sources of mortality such as preying from other species, migration barriers, pollution, parasites, and pathogens.

- the Commission should put equal pressure on Member States to fully implement the existing provisions of the Eel Regulation and to do more upstream and manage fisheries in internal waters, compared to actions that may be considered in marine and coastal waters. HELCOM and BALTFISH should cooperate in this respect.
- a mandatory catch documentation system in both commercial and recreational fisheries, such as tagging systems, should be implemented.
- measures against IUU fishing for eel should be prioritised. The illegal fishery and subsequent illegal export of eel to Asia is widespread and totally unacceptable. More and serious efforts should be made to make sure that the law is complied with and that sufficient resources are allocated.
- the EU ban on all eel exports to countries outside the EU should remain. This ban has been in force since 2010. This ban needs to be combined with further efforts to control it effectively, including better EU-wide traceability systems. Efforts are still a long way from the desired goal.

ICES advice published on 3rd November 2022² states again that when the precautionary approach is applied, there should be zero catches in all habitats in 2023. This applies to both recreational and commercial catches and includes catches of glass eels for restocking and aquaculture. The BSAC is not in agreement on the ICES advice of zero catches in EU waters³.

As for the contribution of the BSAC to the roundtable discussion on how to achieve the right balance between the three pillars of sustainability of the Common Fisheries Policy- environmental, social and economic, we would like to draw the attention to:

1. **The BSAC White Paper**
2. **The BSAC work priorities for the work programme 2022-2023**

² https://ices-library.figshare.com/articles/report/European_eel_Anguilla_anguilla_throughout_its_natural_range/19772374

³ The majority of the BSAC members reject the ICES advice of zero catches. A minority does not agree with the statement rejecting the ICES advice.

The BSAC White Paper is a holistic paper that takes into account and reflects the broad interests and concerns of the BSAC over the implementation and revision of the CFP with a Baltic perspective

At this particular meeting it should be highlighted that the production of the **BSAC White Paper** has been an inclusive process involving BSAC members as well as observers taking an active role in the discussions and the formulation of the recommendations, including representatives from EU institutions.

Emphasis is on consensus views throughout the paper.

The same is to be said about the BSAC work priorities which have been prepared by the BSAC Working Groups.

With regard to the implementation and revision of the CFP from the Baltic perspective the White Paper highlights:

1. **The importance of the ecosystem-based approach to fisheries management (EBFM) understood as being about balancing human activities and environmental stewardship in a multiple use context, and about ensuring fish for the future.**
 - a. specially for the Baltic Sea, the impacts of climate change are needed to be incorporated
 - b. it is important to have an adaptive and fast decision-making process at regional level.
 - c. Scientific knowledge should be promoted in the fisheries sector, and the knowledge from the fishers (commercial and recreational) is essential.
 - d. EBFM should consider:
 - multispecies management, taking into account both the prey/predator relationship and harvesting patterns, and how environmental conditions affect the conditions of the stocks.
 - minimising the unwanted/undesired effects of fishing on protected species and habitats.
 - where appropriate, strategies for the active rebuilding of fish stocks, including protecting and restoring habitats

The White Paper also highlights:

2. The need to make the **best use of the scientific advice**: BSAC suggests that the Commission puts forward a green paper on the functioning of the scientific advisory system and possible ways in which to improve it.
3. Problems posed with **reaching the MSY** objectives: BSAC suggests actions towards a robust MSY policy, as well as the need to evaluate and assess the MSY

principle. *Bmsy values are still missing for some Baltic stocks, without a biomass target the success in implementing MSY management has been limited.*

4. Implementation of the **Landing Obligation** is a challenge: BSAC suggests several actions in order for it to work better:
 - focus on technical measures and improve fisheries monitoring and control.
 - a distinction should be made between the obligation to account for all catches and to land all catches.

Regionalisation is an ongoing process. BSAC sees a need to have established a closer working contact with BALTFISH.

5. **Recreational and sport fisheries** play not only a key role in the fishing community in the Baltic Sea region, but also in the exploitation of several stocks. In consequence, recreational and sport fisheries should be part of the CFP and should be clearly defined in the CFP.

6. Further discussion on **the EU subsidies** together with knowledgeable experts, stakeholders Member States and the European Commission is needed, especially to review the goals, remove real and formal constraints which arose due to the condition of the stocks, COVID and the war in Ukraine. The BSAC finds it important to initiate support towards optimisation of the remaining fishery, the development of new fisheries, selective fishing gears, and technology aimed at minimising CO² emissions from fisheries.

7. BSAC underlines that a clear link between setting priorities, analysing and documenting the **social and economic consequences of decisions taken** is needed.

As for the BSAC work priorities (work programme 2022-2023), for the purposes of this particular discussion, we would like to draw the attention to the following issues:

Horizontal issues for all Working Groups

- The blue dimension in the EU Green Deal and the Blue Deal
- Fisheries as part of the Farm to Fork Strategy – a sustainable, protein-rich seafood provided by fisheries
- Fisheries contributing to addressing the climate change
- Management of seals and other predators and interactions with fisheries
- Recreational fisheries: Towards a balanced and proportionate policy for recreational fisheries under the Common Fisheries Policy, work will include measures to strengthen reporting and data collection from recreational fisheries,

1. Under the chairmanship of the **Demersal Working Group**
 - the need to improve selectivity to avoid unwanted catches of cod
 - the need to continue focused work related to the Technical Measures Regulation and the Commission Action Plan to conserve fisheries resources and protect marine ecosystems

2. Under the chairmanship of the **Pelagic Working Group**
 - The need to investigate further work on management of the western Baltic spring spawning herring with a view to developing a re-building strategy for this stock.
 - The need to follow up on stickleback and trial fisheries in the Baltic.

3. Under the chairmanship of the **Ecosystem based Working Group**
 - the need for ongoing work on the review of the Marine Strategy Framework Directive: including work on those descriptors that are relevant to fisheries
 - the need for the integrated sea use management/maritime spatial planning and offshore windfarms development, taking into account that by the year 2050 one third of the EU offshore windfarms-based energy will be coming from the Baltic Sea.
 - the need for collaboration with HELCOM and BALTFISH on implementing the Baltic Sea Action Plan
 - the need for the multiannual management plan for salmon: including specific technical measures for salmon, as well as control issues in the salmon fishery

Eel: need for further work/follow-up on how to best implement the latest ICES advice.