

To ICES General Secretary Anne Christine Brusendorff

Copenhagen 25th June 2014

Dear Anne Christine,

At the BSAC Joint WG meeting on 11th and 12th June 2014, the ICES advice for the Baltic was presented and discussed under the helpful and able guidance of John Simmonds, ACOM Vice-chair. The rationale for the advice was discussed intensively, especially with regard to cod. It is sad to note that ICES has not been able to apply a model for a comprehensive assessment and advice for the eastern cod. This seems to be the result of a scientific bias in developing and using proper models for the assessment. The BSAC calls on ICES to ensure that “science based advice” entails that major factors regarding stock development and the utilisation of the stock are properly taken into account.

Of more principal concern is the ICES advice for the western cod. In its advice line ICES simply states that “ICES advises on the basis of the MSY approach that the total commercial catches should be no more than 8.793 tonnes in 2015.” This is a cut of 48 % compared to the TAC for 2014. Following the approved EU management plan would result in a TAC increase of 12%. Both options entail an increase in SSB and the stock being within the precautionary approach. Nevertheless, ICES has chosen explicitly to advise using the MSY approach.

The BSAC would like to draw the attention of ICES to the policy that has been established in the reformed CFP. In the context of TAC setting, the CFP applies the following targets:

1. **“The CFP shall apply the precautionary approach to fisheries management,**
2. **and shall aim to ensure levels which can produce the maximum sustainable yield”**

The BSAC notes that the precautionary approach is a conservation measure aimed at protecting stocks, while MSY is a yield concept, something to ensure a high and stable commercial utilization of the fish stocks.

The CFP adds: *“The maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and, on a progressive, incremental basis at the latest by 2020 for all stocks.”*

The BSAC finds it difficult to understand why ICES chooses to use the yield argument to cut catches by 48% for 2015 in contradiction with the politically agreed management plan and in a situation where a number of other options could establish MSY by 2020. It is regrettable that the management plan in force has not been reviewed with a view to making necessary amendments in line with the development of the cod stocks.

In giving very explicit advice against this background ICES has interfered with and possibly prejudiced the political discussions regarding the level of the TAC and the speed with which MSY should be achieved. The BSAC will be interested to know the rationale behind the ACOM decision to choose just one management option in the given situation.

Given the strong development towards a regionalized CFP, the BSAC expects to engage even more in the basis for the advisory work. The BSAC supports that an independent international science body is responsible for future advisory work. We appreciate greatly the openness and readiness of ICES to discuss matters, as well as the highly qualified work that is done by the organisation. The independence that we cherish and support must also be nourished by ICES itself.

The BSAC invites ICES to respond to the issues raised and to consider giving advice that makes it possible at political level for decisions to be made between management options that lie in the range above the precautionary approach.

We look forward to hearing from you.

Kind regards,



Reine J. Johansson
Chairman of the BSAC



Ewa Milewska
Vice-chair of the BSAC

Copy to Eskild Kirkegaard, ICES Chair of ACOM

Copy to DG Mare and Baltic Member States, including the BALTFISH chair