

## COMPILATION of the BSAC positions to the Commission's proposal for fishing opportunities in the Baltic for 2021

### **Background:**

The BSAC sent to DG Mare and Member States its **recommendations for the Baltic fisheries** at the end of June.<sup>1</sup> The BSAC also replied to the Commission's Communication on the fishing opportunities.<sup>2</sup> The Commission's proposal for fishing opportunities in the Baltic for 2021 was published on 28<sup>th</sup> August 2020, and the Secretariat made a **table overview** of the figures.<sup>3</sup> The BSAC Executive Committee met and analysed and discussed the Commission's proposal on 4<sup>th</sup> September 2020. The reactions given by the BSAC members during the meeting were presented by the ExCom Chair at the BALTFISH Forum on 7<sup>th</sup> September 2020 (a report from the BALTFISH meeting is on the website<sup>4</sup>). **A report** from the ExCom meeting was also produced.<sup>5</sup>

**Below is the compilation of the BSAC views on the fishing opportunities in the Baltic for 2021 based on the above-mentioned meetings and documents.**

### **General comments**

BSAC members are not in consensus on all the recommended TACs, but agree on the continued need to focus on the overall ecosystem, and the other factors affecting the well-being of certain stocks, and of which fishing is just one of the factors having an influence. Several other challenging developments are occurring at the same time. The BSAC encourages further development by ICES of its fisheries overviews, taking into account ecosystem, multi-species considerations and food-web interactions. Science should make more effort to solve the problems of regime shift in the Baltic and age determination of cod in the Baltic.

The BSAC recommends that the management measures, including seasonal and spatial closures that have been implemented for cod in 2020, should be evaluated by ICES no later than 2021.

There should be a more substantial reflection on socio-economic aspects of the Commission's proposal to decrease fishing opportunities for some relevant stocks in the Baltic. Social schemes are needed, otherwise there may be an irreversible loss of structures of the sector, such as associations/cooperatives/POs, small ports, processing and marketing.

---

<sup>1</sup> <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-Baltic-fisheries-2021>

<sup>2</sup> <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-reply-to-Commission-Communication-on-fishing>

<sup>3</sup> [http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-\(4\)](http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-(4))

<sup>4</sup> <http://www.bsac.dk/getattachment/BSAC-Resources/Documents-section/Letters-to-ExCom/BALTFISH070920reportbySecretariatFINAL.pdf.aspx?lang=en-GB>

<sup>5</sup> [Link to the ExComreport](#) [not yet finalised]

Long-term thinking to address the unintended consequences of the technical measures regulation should be addressed.

The BSAC maintains pressure on decision makers to work on joint recommendations for selective gears e.g. avoidance of cod bycatch in the flatfish fisheries. The BSAC urges Member States to work more urgently on developing gears that are more selective and that enable the escape of cod in the flatfish fishery. The BSAC agrees that further work on selectivity in the flatfish fishery deserves top priority, and is needed in order to prepare and implement a joint recommendation.<sup>6</sup>

The fisheries representatives call for the implementation of the measures aimed at mitigating the predation of seals on cod. In their view, further growth of the seal population and no action may lead to a total destruction of the coastal fishery.

### **Cod SDs 22-24**

**The Commission proposes to set the 2021 TAC for western cod at 3.395 t. (Reduction of 11% compared to 2020 TAC)**

**BSAC recommendation  $F_{msy}$  4.635 t commercial catch (please see all details in the table, footnote 3)**

**Two BSAC minority positions:  $\leq$  2.960 t and 5.385 t commercial catch**

Several fisheries representatives find the Commission's proposal unacceptable, since the proposal is not in line with the actual state of the stock. They refer to the increasing trend in the biomass indicated by scientists, and which is expected to be above  $B_{trigger}$  next year, leaving room for a rollover of the TAC or even an increase (by 20%). The consequences of a proposed reduction in the TAC will be very severe for the fishing industry. Already now, several fishing companies are close to a turning point.

Fisheries representatives express deep disappointment that the Commission does not take into account the socio-economic effects of such decisions.

The BSAC refers to the management of SD 24 and asks for more access to cod fishery in SD 24, assuming there is no catch of the eastern cod in this area.

Several OIG representatives support the Commission's proposal and praise its responsible approach in setting the TAC in line with scientific advice.

The recreational anglers<sup>7</sup> recommend setting the TAC for 2021 at the lower  $F_{MSY}$  range of 2.960 t and  $F_{MSY}$  4.635 t and with the same recreational measures as in 2020. In their view, the measures applied in the recreational fishery should be proportionate to the measures in the commercial fishery: if the TAC is increased, the bag limit for recreational fishery should also be raised.

---

<sup>6</sup> Latest reference to BALTFISH Forum 9.6.20 and information on trials in Germany.

<sup>7</sup> European Anglers Alliance

### **Spawning closures**

For 2021, the BSAC<sup>8</sup> does not recommend any spawning closures. The BSAC continues to underline the need to monitor and evaluate any new or existing closures applied.

A composite reply to a questionnaire<sup>9</sup> from the BSAC was sent to BALTFISH and copied to DG Mare in the form of current experience<sup>10</sup>.

The views in the BSAC on closures are diverse.

Nevertheless, the BSAC is generally concerned about the fact that closures are introduced without securing the means to analyse their effectiveness. The introduction of any closures should be preceded by an analysis of whether they will have an effect on the stock in question. The BSAC continues to ask ICES for updates and to investigate the effect of these measures. As a minimum, exemptions for small scale vessels using static gears should be extended to small scale active gears fishing on local herring stocks close to the shore. Their summer fishery is important to the local community and economy.

Several fisheries representatives are of the opinion that closures have not been demonstrated to have any measurable positive impact on stock development, but at the same time have large effects on the fishing sector. The closure in SD 22 should be removed, as it is counterproductive.

German small-scale fishermen<sup>11</sup> support measures which aim at the recovery of the cod stock, including the closure of all trawl fishery for the protection of cod during the spawning season. The introduction of closures should be preceded by a five year analysis of their effectiveness.

Some OIG representatives highlight that according to ICES, closures may have a positive effect on the SSB. They refer to an ICES reply to a special request<sup>12</sup>; a potential closure of SD26 for demersal fisheries would protect a substantial part of the EBC stock, while having limited implications for EU flatfish fisheries.

---

<sup>8</sup> Several fisheries representatives and some recreational fishermen

<sup>9</sup> BSAC members [fisheries interests and recreations/sports/anglers] have been asked to provide feedback on the effect of the closure periods for fishing cod [western and eastern Baltic cod] according to Regulation 2019/1318. Included in the footnotes to the TAC for SDs 22 and 23 there is a prohibition to fish this quota from 1 February to 31 March, and in SD 24 from 1 June to 31 July. Certain derogations are also in the footnotes. Included in the footnotes to the TAC for SDs 25 and 26 there is a prohibition to fish this quota from 1 May to 31 August. Certain derogations are also in the footnotes.

<sup>10</sup> [Link to replies on closures](#) [to be linked]

<sup>11</sup> Association of Fisheries Protection

<sup>12</sup> [https://www.ices.dk/sites/pub/Publication%20Reports/Advice/2019/Special\\_Requests/eu.2019.24.pdf](https://www.ices.dk/sites/pub/Publication%20Reports/Advice/2019/Special_Requests/eu.2019.24.pdf)

### **Cod SDs 24-32**

**The Commission proposes to set the 2021 TAC for eastern cod as by-catch TAC of 595 t.**

**(Reduction of 70% compared to 2020 TAC)**

**BSAC recommendation rollover of by-catch quota 2.000 t.**

**BSAC minority position 0t.**

The BSAC underlines once again that there are no short-term solutions. The BSAC repeats the need to implement a long-term remedial plan. The problem needs to be approached in a holistic way, taking into account the cod stock, but also the people living from it. In setting the TAC, the BSAC thus continues to underline the need to mitigate the socio-economic consequences that a zero TAC will have on the fishing industry. With respect to the measures aimed at the recovery of the eastern cod stock, the BSAC is fully committed to focusing on this work together with BALTFISH. Several fisheries representatives find the Commission's proposal to set the by-catch TAC at 595 t unacceptable. In their view, the by-catch quota for eastern Baltic should be set at least at 2000 t, in order to allow a targeted fishery for other fish, and thus allow fishing enterprises to survive. They ask the Commission to evaluate the levels of by-catch of cod in Baltic fisheries. The by-catch quota proposed by the Commission will have a tremendous socio-economic impact. Many fishing companies will be closed down.

Several fisheries representatives reiterate the proposal from 2019 to split SD 24 by drawing a line from Smygehuk on the Swedish coast to a point East of Świnoujście in Poland where the line between SDs 24 and 25 touches the Polish coast.

The group of OIG<sup>13</sup> members recommends that the TAC for 2021 should be set at zero in SDs 25-32, and zero in SD 24 based on the ICES advice on fishing opportunities. The group of OIG members recommends additional measures for eastern cod: these relate to monitoring and control, selective fishing gears and closures, and they are presented in detail in the BSAC recommendations<sup>14</sup>.

### **Herring SDs 22-24 (WBH)**

**The Commission proposes to set the 2021 TAC for western herring at 1.575 t.**

**(Reduction of 50% compared to 2020 TAC)**

**BSAC recommendation rollover of 3.150 t;**

**BSAC minority position 0t.**

The BSAC repeats and underlines the need to take into account the socio-economic consequences of a zero advice on the fishing industry.

---

<sup>13</sup> Coalition Clean Baltic, WWF, the Fisheries Secretariat, Finnish Association for Nature Conservation, European Anglers Alliance.

<sup>14</sup> <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-Baltic-fisheries-2021>

Several fisheries representatives note that the TAC proposed by the Commission will result in a collapse of fishery in SDs 22-24. A reduction in this fishery puts pressure and competition on other stocks.

A group of OIG representatives<sup>15</sup> recommend a zero catch for western Baltic herring in 2021. The TAC proposed by the Commission may hinder the recovery of this stock.

Both representatives from industry and OIG representatives find that is “unfair” to manage the stock only in the Baltic when it straddles through 3A. Norwegian catches from this stock must be managed adequately, otherwise only EU fishermen contribute to the recovery of the stock. The BSAC encourages BALTFISH and the Commission to follow the ICES advice and seek solutions to minimise the risk of bycatch of WBH in related fisheries.

### **Herring SDs 25-29**

**The Commission proposes to set the 2021 TAC for central herring at 97.551 t. (reduction of 36% as compared to 2020)**

**BSAC recommendation 101.226 t.**

**Two BSAC minority positions: ≤97.551 t Consider setting TAC in the lower F<sub>MSY</sub> range (72.319 – 97.551t.), and 122.707 t.**

Several fisheries representatives find the Commission’s proposal to decrease the TAC for herring in 2021 unacceptable. Whilst industry representatives note the need to adjust the TAC downwards in order to reach a better balance between the herring and the sprat, they are reaching the limit. The industry relies on this stock, and for that reason the BSAC recommendation to set the TAC at 101.226 tonnes should be followed.

The BSAC recommends carrying out a full benchmark in order to update the assessment models. A key issue is also to carry out an evaluation of the measures in place to protect the cod – including the closure in SDs 25 and 26 from May to August and which de facto close the sprat and herring fisheries.

In its recommendation of **≤97.551 t** a group of OIG representatives<sup>16</sup> refers to an ecosystem-based approach to fisheries management, taking into account dynamics between the stocks of eastern Baltic cod and herring.

The other minority position of **122.707 t.** follows a 20% reduction.

---

<sup>15</sup> Coalition Clean Baltic, WWF, the Fisheries Secretariat, Finnish Association for Nature Conservation, European Anglers Alliance

<sup>16</sup> Coalition Clean Baltic, WWF, the Fisheries Secretariat, Finnish Association for Nature Conservation, European Anglers Alliance

### **Gulf of Riga Herring**

**Commission proposes a TAC of 39.446 t  
(Increase of 15% compared to 2020 TAC)  
BSAC recommendation 39.446 t.  
Minority position  $\leq 39.446$  t**

There has been no discussion of this stock.

### **Herring SDs30+31**

**The Commission proposes a rollover 65.018 t.  
BSAC recommendation 65.018 t.  
BSAC minority position  $\leq 65.018$  t**

The BSAC takes note of the lack of reference points for this stock. The BSAC encourages the Member States to improve data collection to provide more data from surveys for this stock next year and improve the assessment. It takes note of the fact that there will be a workshop with the purpose of producing a full analytical assessment for the stock.

### **Sprat**

**The Commission proposes to set the 2021 TAC for sprat at 210.147 t.  
This is a rollover of the current TAC  
BSAC recommendation 222.958 t  
Three minority positions  $\leq 222.958$  t (consider setting the TAC in the lower  $F_{MSY}$  range (163.265 – 222.958 t), 284.896 t, 241.669 t**

Several fisheries representatives recommend setting the TAC at 222.958 tonnes (MAP MSY), in order to better reflect the balance between the sprat and central herring.

The BSAC does not see the need for a spatial management of the sprat fishery, since moving the sprat fishery to the north would have a severe impact on coastal vessels. More scientific research is needed in order to document and evaluate the benefits of spatial management for cod stocks.

In view of some fisheries representatives, the impact of sprat as a predator on cod eggs could be limited by increasing the TAC. In view of some other fisheries representatives, the sprat TAC should be increased to secure food for small herring and rebalance the food availability in the Baltic. Reducing the TAC for sprat does not help the cod stock.

The group of OIG representatives<sup>17</sup> recommending  $\leq 222.958$  t refer to the need to secure a food base for cod, and recommend a spatial distribution of the fishery. They also highlight misreporting.

The minority recommendation of 241.669 t is a 15% increase to avoid extreme annual variations.

---

<sup>17</sup> Coalition Clean Baltic, WWF, the Fisheries Secretariat, Finnish Association for Nature Conservation, European Anglers Alliance

### **Central herring and sprat – and the technical measures.**

There will be a big biomass of sprat, but a smaller one of herring. Some fisheries representatives point to the provisions in the EU technical measures regulation 1241/2019 on the use of mesh size when fishing herring and sprat (Annex VIII). Mesh size and catch composition rules give the coastal fleets difficulties if they only have quota for one of the stocks; whereas bigger vessels can usually swop their quotas.

Some fisheries representatives recommend the following actions to address this problem:

Delete the demand for 32 mm mesh size in the directed fishery for herring, mackerel, horse mackerel and blue whiting. Instead, use only minimum 16 mm mesh size. There is no biological justification for the 32 mm mesh.

Delete the footnote 2) demanding a minimum of 55% sprat when fishing with 16 mm mesh

Raise the sprat TAC according to the Baltic Sea Multiannual Plan.

### **Stickleback**

The BSAC draws attention to the fact that the growing population of stickleback could be a problem, because they eat the same food as commercial fish.<sup>18</sup> In the opinion of some of its members, stickleback should be fished more intensively. The BSAC will discuss the issue at its ecosystem base management meetings in the near future.<sup>19</sup> Pilot fishery projects should be given support.

### **Plaice**

**The Commission proposes to set the 2021 TAC for plaice at 6.894 t.**

**(Rollover)**

**BSAC recommendation 7.754 t**

**BSAC minority position  $\leq 7.754$  t**

Fisheries representatives have questioned why the TAC proposed by the Commission is below the scientific advice.

---

<sup>18</sup> Swedish Pelagic PO sent link to SLU article 27.8.20: New research shows that stickleback is taking over parts of the Baltic Johan Eklöf and Ulf Bergström. Swedish:

<https://www.slu.se/ew-nyheter/2020/8/spiggen-tar-over-ostersjokusten-vik-for-vik/>

<sup>19</sup> <http://www.bsac.dk/Meetings/BSAC-meetings/Ecosystem-based-working-group>

### **Salmon SDs 22-31**

**COM proposes a TAC of 94.496 individuals.**

**(Increase of 9% compared to 2020 TAC)**

**BSAC recommendation 96.600 individuals**

**BSAC minority consider a more precautionary TAC of 75.831 individuals**

The BSAC recommends following the ICES advice in setting the 2021 TAC for salmon in SDs 22-31. It welcomes the change in regulations banning sea trout fishing beyond a 4-mile baseline in the Baltic offshore area and which have succeeded in reducing misreported catches.

Several OIG representatives note that the state of most salmon stocks does not permit an increase of the TAC above the current level. They recommend a more precautionary TAC, together with a set of measures to protect the weak stocks. Efficient control should be introduced to eliminate unreported catches. They are also concerned about the effectiveness of the measures used to decrease misreporting.

Some fisheries representatives underline the big impact of seals on salmon fishery and call for measures to solve the problem.

### **Salmon SD 32**

**COM proposes a TAC of 8.714 individuals.**

**(Reduction of 10% compared to 2020 TAC)**

**BSAC recommendation 8.889 individuals**

**BSAC minority position ≤8.889 individuals**

The BSAC recommends that the 2021 TAC for salmon in SD 32 should be 8.889 individuals. One fisheries representative regrets the proposed decrease: the fishery has been good this year.

The group of OIG<sup>20</sup> members recommends that the 2021 TAC should not exceed 8.889 salmon, targeting only the reared salmon and protecting weak natural / endemic stocks.

---

<sup>20</sup> WWF, CCB, Fisheries Secretariat and Finnish Association for Nature Conservation, European Anglers Alliance