

**BSAC recommendations to the ICES advice for
western Baltic cod and for Baltic salmon**

Background

The advice from ICES for western Baltic cod and for Baltic salmon was delayed until September 2021. The BSAC met at a Working Group on 22nd September 2021. The meeting was chaired by the BSAC ExCom Chair. Two members of the BSAC presented a summary of the ICES advice, basing their presentations on the contents of the ICES advice sheets.¹ The meeting was also made aware of the Commission's non-paper of 20th September 2021, updating its proposal COM (2021) 491 to include amendments to the Commission Proposal regarding fishing opportunities for western Baltic cod.^{2 3}

Members of the Working Group listened, discussed and provided their input. The ExCom Chair asked the Working Group members to provide their comments and positions to the BSAC draft recommendations for western Baltic cod and for Baltic salmon compiled by the Secretariat after the meeting. These BSAC recommendations would then be sent to the European Commission as soon as possible.

The draft from the Secretariat was sent to the ExCom for comment and approval, concluded Thursday 30th September 2021.

The recommendations are sent to DG Mare and BALTFISH.

¹ <http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-General-Assembly-and-Executive-Committee>

² https://ec.europa.eu/oceans-and-fisheries/fisheries/rules/fishing-quotas/tacs-and-quotas-2022_da

³ The Commission non-paper with amendments to the Commission proposal regarding fishing opportunities for salmon is not referred to here.

Western Baltic cod

ICES advises that when the MSY approach is applied, catches should be no more than 698 tonnes in 2022. This applies to commercial and recreational catches.

The Commission non-paper includes a TAC of 324 tonnes, exclusively for by-catches.

Several representatives of fisheries and a representative of the recreational fishermen welcome the fact that ICES has been able carry out an inter-benchmark on the stock and take note of its findings: low catches, poor recruitment, a slow decline in fishing mortality, and the lower evaluation of stock size. They take note of the poor situation of the western Baltic cod. Given the fact that ICES has resolved outstanding issues, there is a theoretical possibility that the western cod can get above Blim by 2023. The ICES advised TAC of 698 tonnes, on the basis of a very big change in its retrospective revision of the stock, and Commission recommended TAC of 324 tonnes are very difficult for the fishing industry to accommodate and adjust to. They recommend setting the TAC for western Baltic cod in 2022 on the basis of a total catch of 4.461 tonnes which, according to ICES, is precautionary, and will result in an increase of 40% in SSB.

Representatives of the small-scale fisheries find the advice from ICES to be tough, but to be expected after the fishing activities of large vessels in SD 22 over the last two years. If the Commission follows the ICES recommendation, the resulting low cod TAC should only be usable as bycatch. The active fishery with the nets currently allowed should be excluded due to its low selectivity. This would exhaust the small TAC and make it impossible for the local small-scale fishery to supply the local market with fresh fish throughout the year and at affordable prices.

Representatives of fisheries and of the small-scale fisheries do not recommend a closure of the recreational fisheries: any measures applied to the commercial fisheries should be mirrored in the recreational fisheries.

Representatives of the environmental OIGs take note of the advice and recommend a closure of the targeted fishery and to apply the by-catch TAC proposed by the Commission. The issue goes beyond the realm of fisheries management and requires other measures that address the underlying issues facing the Baltic ecosystem. All fisheries targeting cod must be stopped in 2022, both for commercial and recreational fishing. As the WBC spawning stock biomass (SBB) is very low and below the critical Blim level (signalling that the reproduction of the population is impaired), Member States should consider setting the TAC within the F-MSY-lower range.

They would therefore recommend an EU bycatch TAC not exceeding the level of 324 tonnes, corresponding to the F-MSY-lower point value (based on Table 2 from page 2 of the ICES advice⁴ and on the assumption that 30% of the catches should be secured for the recreational fisheries). In the allocation of the bycatch TAC, all Member States must allocate the quotas according to Art. 17 of the CFP, and thereby all Member States must consider the allocation of the by-catch quota to such fisheries that cannot avoid bycatch

⁴ <http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-General-Assembly-and-Executive-Committee/cod-27-22-24.pdf.aspx?lang=en-GB>

while adhering to Article 17 in the CFP. They recommend that Member States prioritise those vessels with the least habitat damage. This would be in line with the EU's Biodiversity Strategy and the EU's Green Deal. Recreational fishing in the area is important and should be given a share of the bycatch TAC.

However, additional measures should be adopted, such as mandatory catch and release rules for anglers. Gear restrictions (e.g. mesh size) for recreational fishing using gillnets, should be adopted in order to avoid by-catch of cod. Additional measures such as fully closed areas should also be considered. All spawning areas must continue to be fully protected and closed from fishing activities in the relevant spawning period. The closure must apply to both commercial and recreational fishers.

Representatives of the anglers and sports fisheries take note of the ICES advice, but point out that the situation can be changed. They underline the importance and added value of recreational angling and that it provides recreational fishing opportunities. They recommend a suite of measures that should be introduced in order to ensure that there remains an opportunity for angling and sports fishing in SDs 22-.24:

- Consider alternative management measures which further lower the recreational catch
- No dedicated fishing activities on spawning cod.
- Improvement and obligatory use of selective gear to reduce bycatch of cod in commercial fisheries, is urgently needed.

Angling and sports fisheries organisations from three Baltic MS (DE, DK and SE) have shared with the BSAC their recommendations for 2022, and these are attached to this paper. ./.

The BSAC continues to call for a swift introduction of selective gears to make possible the prevention of catches of cod in other fisheries.

Baltic salmon

ICES advice for salmon in SDs 22-31

ICES advises that according to the MSY approach, the catch of salmon in the mixed-stock sea fisheries (both commercial and recreational) should be zero in 2022.

ICES advises that if spatial-temporal management can be implemented, some fishing opportunities would be possible. The ICES advice includes 10 fishing scenarios, including a full closure and different degree of total catches at sea. Scenarios 7–10 assume that all coastal and offshore fisheries in SDs 22–28 and 29 south are closed (both recreational and commercial).

Coastal fisheries in the Gulf of Bothnia and the Åland Sea (in SDs 29 north–31) would be allowed with various amounts of total catches. (Within 4 nm in Åland Sea and Gulf of Bothnia (SD 29N-31), during May to August, approx. 75 000 salmon).

Representatives of the fisheries are of the view that the advised ICES advice will have a major effect on those who fish salmon. Salmon fishery in the main basin is important to several fishing Member States. If spatial temporal measures are introduced into the northern part of the Baltic, this will have implications for relative stability. For salmon, it is important to move towards river-based fisheries management. This will make possible both a sustainable commercial and recreational fishery. The advice from ICES is a good step towards this. There is considerable genetic data available that makes it possible for both Finland and Sweden to fine scale the management in the coastal areas of the Bothnian Bay. By using this data, fishing activities can be targeted to areas near rivers with the strongest salmon stocks. It is also very important to improve conditions in rivers with weak salmon stocks. For the recovery of weak stocks (as well as for maintenance of strong stocks), it is crucial to take firm action in the management of both cormorant and seal populations, as these predators can have major effects on salmon stocks locally.

If mixed salmon fishery in the main basin is forbidden, in the future only Finland and Sweden will be able to use their salmon quotas (in the Gulf of Bothnia). This means de facto that the relative stability will not be the same as it used to be. Spatial and temporal measures in the Gulf of Bothnia would not have big effects on the commercial trapnet fishery. They would probably decrease possibilities for recreational salmon trolling in that area.

One representative of fisheries cannot accept any type of sports fishing in the southern Baltic. Alternatives for that type of fishing are enormous and can be replaced by other types of sports fishing for other species (or simply other types of recreational activities) without loss of utility, or only marginal losses which have been shown in science. Subsistence use and small-scale commercial salmon fishing should be allowed to continue. Anything else is against all types of management principles regarding a stock that is declining.

A representative of small-scale fisheries cannot accept the advised catch of zero. They highlight the importance of salmon fishery to the small-scale sector in Poland. Such a measure will signal the death of the sector.

Representatives of anglers and sports fisheries take note of the ICES advice and that the current management strategy based on a mixed stock sea fishery with a single common

MSY goal for all wild river stocks is not adequate to protect individual salmon river populations. They draw attention to the efforts put in by angling associations to improve environment and other conditions for Baltic salmon. As with the Baltic cod fishery, the engagement of anglers and sports fishers is important for the recreational salmon fishery in the Baltic Sea. Angling and sports fisheries organisations from three Baltic MS (DE, DK and SW) have worked together to produce a joint advice for the recreational fishing for Baltic salmon 2022. Their recommendations include a harmonisation of measures applied in different Baltic Member States (for minimum size and a bag limit of one salmon per day), use of EMFAF funding for river restoration and removal of barriers, and a Baltic wide programme for a regional management of cormorants.

They have shared with the BSAC their recommendations for 2022, and these are attached to this paper. ./.

Representatives of the environmental OIGs see the advice from ICES as confirmation that mixed stock fisheries in the southern Baltic are not sustainable. They support the closure of fisheries in the southern Baltic, or a gradual phasing out of mixed stock salmon fishery. This must apply to commercial and recreational fisheries. At the same time, a limited fishery for salmon in the northern Baltic is feasible. They see the need to introduce fisheries restrictions, together with river restoration work: that is the essence of a management plan for Baltic salmon, and there should be renewed discussions on a proper management of Baltic salmon. Baltic salmon in SDs 22-31 cannot be managed as one stock, and there must be a move towards specific river-based fisheries management. Targeted fishing for salmon with mixed stock origin in the main basin areas should be closed (commercial and recreational). The TAC should be set at no more than 50.000 salmon, and active and targeted salmon fishing can only take place in the SDs 29 (north) - 31 within 4nm from the coast.

ICES advice for salmon in SD 32

ICES advises that commercial sea catches in 2022 should be no more than 11.800 salmon. This would correspond to reported commercial landings of 10.100 salmon

Representatives of the fisheries are in support of the ICES advice.

Representatives of the environmental OIG point out that it is not justified to have a commercial sea catch in SD 32, given the mixing of salmon with SDs 22-31. The TAC in the Gulf of Finland should be not higher than 9.161 salmon (Russian 9,3% share deducted), and all wild salmon catches must be as low as possible.

Representatives of anglers and sports fisheries call for an improved management of the stock in SD 32.

The BSAC is in consensus on the need to look at a renewed management of the Baltic salmon in all SDs. It repeats its calls to initiate the work on developing a management plan.