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You ref: Ares (2021) 4597560 – 15/07/2021

Copenhagen Thursday 19th August 2021

Subject: BSAC's recommendations for the fishery in the Baltic Sea for 2022 – follow-up with information on sprat

Dear Ms Vitcheva,

Thank you very much for your reply to the BSAC recommendations on the Baltic fisheries in 2022. We appreciate that when drafting the Commission proposal, you will take the BSAC proposals into account, to the extent where you consider this in conformity with the legislation. We look forward to seeing the Commission proposal, due out later this month. We also anticipate the BALTFISH Forum meeting, planned in September 2021, when we can refer to the BSAC recommendations and provide initial reaction to the Commission's proposal.

The BSAC Management Team recently held a meeting with the Latvian BALTFISH Presidency. The aim of the meeting was to establish the best possible cooperation between BALTFISH and the BSAC under the new BALTFISH presidency, and to exchange information on current and upcoming work. I attach an approved meeting report. ./.

Now I would like to return to your reply to the BSAC recommendations and highlight sprat. Several members had recommended the upper F_{MSY} value, stating that maximising catches of sprat will help the situation for cod, and is according to the ecosystem approach. In your letter, you state that their advice is not in line with the legislative framework.

You draw attention to the fact that there is no peer-reviewed scientific advice indicating that it is necessary to set the sprat TAC in the upper F_{MSY} range to avoid serious harm to a stock, and that the BSAC does not mention any.

Three of the fisheries representatives have highlighted and referred to scientific papers, which they have sent to the BSAC Secretariat with a strong desire to back up their position and share.

The first is a paper from H. Soudijn et al from 2021: Harvesting forage fish can prevent fishing-induced population collapses of large piscivorous fish. At the Joint Working Group 8th -9th June 2021¹, several fisheries representatives stated that in view of the growing Baltic sprat stock, the catches of sprat should be maximised to the highest level recommended by ICES, which is the F_{MSY} upper in order to reduce the negative impact of sprat preying on cod eggs and to help fishermen and processors. The paper tests the effects of fishing for forage fish and piscivorous fish, using a model of the Baltic Sea. While overfishing of forage fish must be prevented, their study shows that reducing fishing pressures on forage fish may have unwanted negative side effects on piscivores.

The second paper is by Michele Casini et al from 2011: Food-web and climate-related dynamics in the Baltic Sea: Present and potential future applications in fish stock assessment and management. This paper draws attention to food-web and climate-related dynamics in the Baltic Sea. It shows that a high sprat population could potentially influence cod recruitment via predation on cod eggs and contribute to keeping the cod stock low.

The third paper is from Viola Neumann et al from 2015: Fish egg predation by Baltic sprat and herring: do species characteristics and development stage matter? This focuses on fish egg predation by sprat and herring and asks whether species characteristics and development stage matter. Predation of eggs by clupeids has been identified as a major factor contributing to early life stage mortality of Baltic cod.

¹ [http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Joint-Working-Group-\(3\)](http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Joint-Working-Group-(3))

Reference to the inter-species considerations for sprat and cod is not included in the ICES advice for sprat. When developing and providing its advice, ICES is replying to the questions and requests received from the Commission. It is our understanding that the Commission has not asked ICES whether a higher TAC for sprat may help the cod.

I write not to support the position of the fisheries interests, but to convey the information, so we share all available knowledge. This should help to stimulate reflection and debate on issues which can be backed up by scientific documentation.

We look forward to your response and to discussing this and other issues with you.

Kind regards,



Esben Sverdrup-Jensen
BSAC ExCom Chair

Copy to: DG Mare Baltic Unit, BALTFISH Member States, Fisheries Council of the European Community, European Parliament, European Fisheries Control Agency, ICES and HELCOM