

Baltic Sea Regional Advisory Council (BSRAC) recommendations on the Regulation of the European Parliament and of the Council establishing a multi-annual plan for the Baltic salmon stock and the fisheries exploiting that stock

Brussels, 12.8 2011

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Scope and objectives of the proposal

1. The objective of the proposal is to establish a multi-annual plan for the management of the fisheries on the salmon stocks in the Baltic Sea, to ensure the favourable conservation status of the entire Baltic stock, i.e. including salmon river stocks, and to provide for a sustainable exploitation.
2. The BSRAC draws the attention of the Commission to the fact that we are dealing with more than one stock. Therefore the title of the long-term management plan should be amended accordingly.
3. The BSRAC recommends changing the definition of service vessels to recreational charter fishing vessels.
4. The specific objectives of the initiative shall be to ensure that the Baltic salmon stocks are exploited in a sustainable way according to the principle of maximum sustainable yield and that the genetic integrity and diversity of the Baltic salmon stock are safeguarded.
5. The BSRAC welcomes the Commission's proposal for a new management plan for salmon in the Baltic Sea region. We also support the idea to strive for a balanced development which will safeguard the survival of salmon stocks in the Baltic Sea region. The successful implementation of a good management plan will also safeguard and develop fishing possibilities for the interest groups concerned.
6. The BSRAC wants to add an additional objective:
Fishermen (commercial and recreational) in the Baltic Sea and its rivers shall be able to utilize the fishing possibilities arising from the positive results of a sustainable management of the Baltic salmon stocks.

Consultation of interested parties and impact assessment

7. The BSRAC would like to stress its earlier contributions to this process by referring to its recommendations from 1st March 2007 and from 5th April 2009. These documents are attached as an integral part of this opinion.
8. The BSRAC would also like to stress the urgent need for a proper analysis to be carried out of the socio-economics of the commercial and recreational fisheries and fish farming, and the socio-economic outcome of the proposal to phase out releases. We also call for a study of the genetic risks of the release programme.

Targets for wild salmon rivers (Article 5)

9. The situation for the wild salmon stocks differs greatly between so-called wild salmon rivers. This is due to different factors relating to geography, weather and climate conditions, water flow in the rivers, environmental conditions in the rivers, quality of released smolt (if you have reinforcement activities for weak stocks), predation pressure and fishing activities.

10. The BSRAC thinks that due to the above-mentioned complex reasons, setting the targets according to points 1- 4 in Article 5 (of the Commission's proposal) by restricting fisheries, combined with a phasing out of releases is unrealistic, especially combined with the given timeframes.¹

11. The BSRAC still stresses that several wild salmon stocks have recovered since the 1990s and that restoration and conservation efforts, combined with restrictions on the commercial and recreational fishery, have increased the natural salmon smolt production. This proves that river restoration efforts can be effective in rebuilding salmon stocks.

12. The BSRAC believes that the wild salmon river complex needs a better elaboration and refers to the detailed explanation which is given in the BSRAC paper from 2007. There is a need to add to the proposal a list of classified salmon rivers according to their present state as salmon rivers. For each classification group of rivers, the most relevant and adopted targets should be set. Restricting fisheries, together with other measures, will be one of the ways of reaching the goals in every wild salmon river. Other measures include restoration of spawning grounds and rehabilitation of rivers.

13. Large scale and general fishing regulations, such as TACs, early summer bans and other closed periods shall be introduced and maintained in order to obtain the objectives for rivers in List A (Successful salmon production - see BSRAC paper 2007). The target could be set to an estimated value of full production for this kind of nominated index rivers, but with a more flexible timetable and more flexibility in classification. This is more in line with the natural conditions, fluctuations in rivers and is, in short, more realistic.

14. After a close analysis of the obstacles for rivers not having reached 50% of the estimated full production, river specific measures and suitable fishing regulations, including closed local areas and periods, shall be introduced and maintained in order to obtain a positive trend in salmon production for these salmon rivers (Lists B and C, BSRAC paper 2007).²

15. Naturally spawning salmon populations shall be re-established in salmon rivers with extirpated salmon stocks (List D, BSRAC paper 2007).

Harvesting rules – TACs (Article 7)

TACs in rivers

16. The BSRAC agrees to the proposal to strive for better data collection in order to get a real assessment of the status of the salmon stocks in different rivers.

TACs at sea

17. The Commission proposes that the annual TAC be based on a constant fishing mortality rate of 0.1.

18. The BSRAC would like to stress that the background to this proposal and the way in which the calculations have been made are not evident. The basis for these estimations is not easy to understand. With respect to differences between salmon rivers, it is hard to understand this overall and general mortality figure for the fishing effort of the whole Baltic Sea region.

¹ CCB and FISH and FANC do not accept the majority position, since they believe that the targets and timelines proposed by the Commission are adequate.

² CCB and FANC do not support this target setting. The same targets should be set for all wild rivers, and fishing restrictions, habitat restoration and protection must be established to meet these targets.

19. The mortality rate of 0.1 seems to take into account, apart from a low number of spawners, an uncertainty which is created by the suspicion of unreported and badly monitored salmon catches. In this case, we strongly support an improvement of the already existing catch monitoring activities, instead of punishing the commercial fisheries sector in general. The majority of the BSRAC suggests a higher F value considering the different stocks in the Baltic Sea area and suggests that the Commission set that value at 0.25.³

20. The BSRAC is of the opinion that potential smolt production capacity should not be the only criterion used for estimating MSY. Other elements required to estimate MSY, such as an assessment of the entire spawning stocks, also need to be investigated.

21. The BSRAC would like to see a differentiated approach with more restrictive fishing measures in areas with many weak salmon stocks. In other areas with strong stocks, the measures should allow a harvest of the good results achieved.

22. The BSRAC is of the opinion that the Commission proposal lacks a clear definition of where the river TAC and the marine TAC should be divided. The BSRAC recommends that this should be the base line plus four nautical miles. This could, for example, be shown by means of a map.

Releases (Articles 12 and 13)

23. The Commission proposes a phasing out of releases of salmon in rivers without potential for the re-establishment of self-sustaining wild salmon populations in order to protect the genetic diversity of the wild stocks.

24. The BSRAC has earlier commented on the problem with mixed and/or exclusive competences when it comes to decision-making between the EU and member states. The release of salmon due to water court decisions in Finland and Sweden is based on national legislation to guarantee legal compensation to water owners and fishermen for lost fishing possibilities.

25. The BSRAC also doubts whether the proposal made by the Commission is compatible with legislation regulating the powers between the Commission and the member states concerned.

26. The BSRAC would also like to point out that the importance of the releases should not be underestimated. There is no assessment of the importance of the releases for fishing activities. Releases support fishing activities, as well as restocking activities necessary for the restoration of weak salmon stocks. It should be based on genetic material from the Baltic Sea, river by river, and, in the case of extinct stocks, from nearby river stocks with similar characteristics.

27. The problems caused by the hydroelectric power industry in this respect will not be solved by removing their obligation to produce smolt as a compensation for destroyed spawning grounds. It should be stressed that biological quality and genetic integrity of the released material, as well as other measures aimed at improving natural reproduction, should be ensured.⁴

³ CCB, FISH, EAA and FANC consider that the proposed F target of 0.1 is appropriate and well founded, based on current practices in the open sea mixed fisheries. The phasing out of the open sea fishery will open up for a more flexible management.

⁴ CCB and FANC are of the opinion that large-scale compensatory releases cannot be regarded as the long-term sustainable solution. They support rearing and releasing as emergency measures for biological reasons; compensation must focus on natural reproduction.

28. The BSRAC has earlier highlighted the low survival of released compensatory post smolts, affecting both the fishery and the pressure on wild salmon, due probably to inappropriate rearing and stocking techniques. It is essential to solve this problem. In this connection, the BSRAC calls on the Commission to develop guidelines for harmonised rearing and releasing practices. The release activity, combined with aquaculture activity, is part of a bigger complex which is needed, also to sustain and fulfil all the recovery actions mentioned in the Commission's proposal.

29. The BSRAC is of the opinion that a phasing out of the releases should be proposed only when there is proof that restoration activities have led to a natural production whose volume and quality correspond to volumes of the proposed phasing out of releases in the same rivers. (See Footnote 4)

Requirement to keep a logbook (Article 16)

30. The BSRAC is of the opinion that the requirement to keep a logbook on board small fishing vessels below 12 metres should be abandoned. Other simple mandatory onshore reporting systems should be developed together with the fishermen.⁵

Catch declaration (Articles 18 and 19)

31. The BSRAC is of the opinion that all user groups should be included in the salmon catch reporting system. The proposal creates a system of unequal treatment of EU citizens. In its current form, the proposal will create a difference between user groups and will make it hard for professional fishermen to understand the logic behind the proposal. Applying a catch reporting system to professional catches and catches by recreational charter fishing vessels is too narrow to be relevant.

Member States reporting (Science and data collection) (Article 23)

32. The BSRAC is of the opinion that better and improved science is needed. Different parts of the complex salmon policy need the support of improved science and data on subjects such as:⁶

1. better knowledge on post-smolt survival / mortality rates and behind laying mechanisms,
2. development of better quality of rearing and release techniques aimed at preserving biological quality and genetic integrity,
3. improved knowledge about different kinds of salmon removal/mortality (inter alia trolling fisheries, by catches in other fisheries, predation by cormorants and seals),
4. catches by recreational fishing, including angling and subsistence fisheries.

⁵ FANC considers that logbooks are needed on board to make control possible.

⁶ FANC considers that pelagic trawls should be included in the list.

Fin clipping

33. The BSRAC is of the opinion that all salmon releases should be subject to mandatory fin clipping.

34. The BSRAC Salmon and sea trout working group approved the text at its meeting on 31st January 2012. It was forwarded to the Executive Committee on 1st February for approval by means of a written procedure. The WG recommended that this be forwarded to the ExCom for approval as quickly as possible.

BS RAC RECOMMENDATION ON A SALMON MANAGEMENT PLAN FOR THE BALTIC SEA

1 March 2007

General

In February 1997 IBSFC adopted a Salmon Action Plan (SAP) in order to avoid a collapse in wild salmon rivers in the Baltic Sea. The SAP was agreed upon for the period 1997-2010. The Baltic Sea RAC has discussed the need of a future plan for the management of Baltic salmon and proposes the following:

- an evaluation of the outcome of the present SAP should be done as soon as possible
- the present SAP should without delay be followed by a renewed management plan building on the successful experience and elements of SAP

Results and experiences from SAP

1. “The status of the wild salmon in the Gulf of Bothnia and the main basin has improved remarkably as a result of measures taken by the IBSFC (i.e. low TACs), measures taken by the coastal states (closed periods) and a lowered M74 mortality (“Guö declaration”). “The total wild smolt production has increased a fourfold since the SAP was adopted in 1997 and is now estimated to be two-thirds of the potential smolt production” (ICES, 2006).
2. “The increase in smolt production is not uniform among rivers and particularly low in the ‘potential’ rivers where salmon were extirpated and are now being introduced” (ICES, 2006). “The status of less productive wild stocks, especially in the southern Baltic Sea area is poor, and even a negative trend in smolt production has been observed within these rivers” (ICES, 2006) “That means the Long Term Objective for 2010 was most probably set too optimistic from a biological point of view.” (“Guö declaration”). Efforts should be made to establish an extended and revised Salmon Action Plan including measures to improve the assessment of the smolt production potential of the individual rivers and measures concerning habitat restoration /or improvement on a river by river basis, where appropriate, taking note of the fact that the individual rivers may need different measures to reach the goal (“Guö declaration”).
3. In recent years there has been a low proportion of reared salmon in the catches and very low recaptures indicating that there is a low initial survival of the reared smolts, probably due to inappropriate new rearing technique. The shift in proportions between reared and wild salmon could also be due to the increased abundance of wild salmon.
4. Poor environmental conditions (i.e ruined spawning areas and migratory obstacles) still have a devastating effect on wild stocks.

Other background

5. The total ban of drift nets in the entire Baltic Sea and other fishing restrictions in countries such as Finland and Sweden have resulted, and will even further result, in lower fishing pressure which has raised a socio-economic concern within the fishing communities. EU regulation concerning dioxin level in salmon has also hampered fishing in certain areas, e.g. in the Southern Baltic Sea and the Belts.
6. Since the late 1980s the seal population has increased significantly and has an impact on salmon stocks and fisheries.
7. Angling for salmon and sea-trout as well as fishing tourism has increased in certain areas during recent years. Recreational fishing and fishing tourism was not recognized in the IBSFC SAP.
8. ICES has pointed out that there is a misreporting between salmon and sea-trout in landings.

Main goals

- A. Salmon stocks in the Baltic Sea and its rivers shall be managed and protected within safe biological limits and the genetic variability should be safeguarded. .
- B. Fishermen (commercial and recreational angling) in the Baltic Sea and its rivers shall be able to utilize the fishing possibilities arising from the positive results of a sustainable management of the Baltic salmon stocks.
- C. Science and research shall be further developed on salmon and sea trout in cooperation with the stakeholders.

Elements of the future management plan for salmon

Safeguard and develop salmon stocks by identifying following groups of salmon rivers;
(classification in A-C refers to the Guö-declaration and the ICES advice 2006)

- I.
 - A. with successful salmon production; i.e. expected to reach at least 50% of their estimated potential by 2010, within safe genetic limits (List A)
 - B. with a positive trend in salmon production, but still not expected to reach at least 50 % of their estimated potential by 2010 (List B),
 - C. with weak and threatened salmon populations, that are in need of emergency action programmes, to safeguard the naturally spawning populations (List C)
 - D. with extirpated wild salmon populations with the potential to reintroduce salmon and/or rivers with reared and released salmon (List D)
 - E. with *inter alia* physical obstacles or other environmental hazards which will impact further development of salmon rivers (List E).

Production goals

- II. The production of wild salmon should gradually increase to attain by 2020 in the salmon rivers (List A) a production of wild Baltic salmon of at least 75 % of the estimated potential and reproduction of at least 50% in Salmon rivers of list B.

Fishing regulations

- III. Large scale and general fishing regulations, like TAC, early summer ban and other closed periods shall be introduced and maintained in order to obtain objectives for rivers in List A.
- IV. After a close analysis of the obstacles for rivers not likely to reach 50% of the estimated potential, river specific measures and suitable fishing regulations, including closed local areas and periods, shall be introduced and maintained in order to obtain a positive trend in salmon production for these salmon rivers (Lists B and C).
- V. Weak wild salmon populations (List C) shall be safeguarded as a first priority action and individual goals for potential salmon production in these rivers should be developed as soon as possible.
- VI. Naturally spawning salmon populations shall be re-established in salmon rivers with extirpated salmon stocks (List D).

Fishing and monitoring activities

- VII. Develop a format in order to introduce individual salmon management plans for each salmon river, both on the coast and in the full length of the rivers, with due consideration to both angling for recreation and fishing tourism, and commercial fisheries.
- VIII. The coastal fisheries should be developed and the level of professional fishing should be maintained as high as possible in order to be able to catch the agreed quotas. Management plans for recreational fishing and fishing tourism in wild salmon rivers should be developed.
- IX. A separate management plan for Baltic sea trout should be developed.

Science

- X. The initial survival of reared salmon shall be increased to previous levels, no later than 2010. Rearing of salmon smolts shall copy the natural development cycle, i.e of sexual maturity and growth development. The national authorities shall enjoin the salmon rearing stations not only to consider the quantity, but also the quality of reared salmon smolts.
- XI. Establish a network of Baltic Sea Index rivers, in every ICES salmon assessment unit, with reliable monitoring of returning spawners, parr densities and smolt migration back to the Baltic Sea. The rivers should be a representative of each respective unit.
- XII. A fin clipping programme for all farmed and released salmon shall be introduced to gain knowledge of migration patterns, and eventually for future management measures. Community Funds, i.e. the Fisheries Fund and/or the Research Framework program should be made available for this purpose.

Environment

- XIII. The interaction between environmental degradation and salmon stocks and production potential should be analysed and taken into consideration.

- XIV. Local and national authorities shall be enjoined to restore spawning areas and migratory obstacles to an optimized standard in accordance with the Habitats Directive for salmon protection.
- XV. The interaction between seal populations and salmon stocks should be closely analysed. The conflict between protection of seal populations and salmon fisheries needs an extended management plan following the successful results of the Interreg project “The Grey Seal in Kvarken.”. Financial support is required for seal safe fishing gear!

Socio-economic aspects of a management plan for salmon

- XVI. A socio-economic study to evaluate the linkage between management measures and their effects on different fishing sectors should be performed.
- XVII. An evaluation of the driftnet ban should be carried out. Socio-economic, stock management and conservation aspects such as effects on salmon stocks, coastal and river fisheries and by-catch of marine mammals and birds need to be included.

General comments on position paper on a salmon management plan

Further involvement of the Baltic Sea RAC

The Baltic Sea RAC and its Working Group on salmon and sea trout appreciate its role as a regional advisory body to the European Commission. In this role it sincerely hopes that the viewpoints expressed by the advisory group are considered and taken into account as soon as the Commission starts its work with a new management plan. Continuous consultation is anticipated and the Baltic Sea RAC should preferably be involved in the monitoring of the implementation of the plan.

Full commitment of different stakeholders

The future management of the salmon stocks in the Baltic Sea is still a very complex issue due to the varied needs of action in different parts of the Baltic Sea. A strong involvement of international, regional and national stakeholders is vital for the future management to be successful.

Science

The importance of science in this process should not be underestimated. Together with the stakeholders, tasks can be identified. These includes migration patterns, which stocks different fisheries are exploiting, better survival of reared smolts, monitoring techniques, production potential, socio-economic effects and effectiveness of different management measures and secure level of genetic variability in different rivers. The management plans for salmon rivers should include measures for habitat improvement, effective fish-ways for returning spawners and downstream migration of smolts, minimum number of returning female spawners to safeguard the genetic variability and regulation of fishery activities.

Management of the fishing possibilities

With the strong development of certain salmon stocks contradictory user demands have developed. The coastal commercial fisheries, recreational angling sector and fishing-tourism all have a growth potential. Professional fisheries have been heavily regulated during the last decades and to such an extent that fishing has to be stopped in certain areas. Recreational fisheries have developed, but still lack catch landing reporting and control. A thorough discussion to solve the conflict, problems and possibilities related to the situation is needed. Management plans and development of the commercial coastal fisheries and angling sector in the rivers should be developed securing healthy and viable fish stocks enabling future sustainable fishing and value to society. It is essential that

ongoing decrease of the survival of the reared and farmed salmon will be stopped, and again increase, in order to minimize the conflict.

The role of stakeholders outside the fisheries sector

The threatened naturally spawning salmon stocks in the Baltic Sea have been of great concern to many governmental institutions, fishermen and other stakeholders for many years. With the strong improvement in many salmon stocks the continued environmental degradation has become a major concern and an obstacle for further development. The future management of salmon will not reach its goals unless also other sectors than the fisheries sector become involved.

Green book on Maritime Policy

To further strengthen salmon stocks, major environmental considerations and actions are required. Improvement of the physical environment for salmon in the sea and the rivers is needed. The EC Maritime Policy document could provide and enable a holistic approach and could also provide the instruments to deal with these problems. In the case of the salmon management policy it is understood by the Baltic Sea RAC that the fisheries sector alone cannot safeguard the salmon stocks in the future. Other economic activities endangering the quality of the physical environment or degrading its quality must also be involved.

BS RAC RECOMMENDATION ON A SALMON MANAGEMENT PLAN FOR THE BALTIC SEA

May 2009

General

In February 1997, the IBSFC adopted a Salmon Action Plan (SAP) in order to avoid a collapse in wild salmon rivers in the Baltic Sea. The SAP was agreed upon for the period 1997-2010. The present action plan is coming to an end, and the European Commission has started work on a new management plan.

In 2007 the BSRAC gave its first opinion on the contents of the future management plan (1st March 2007) and this still forms the basis for BS RAC views on the future salmon management plan.

The European Commission has presented its consultation paper dated 13.02 2009 (MARE D(2009) 1460 (Annex) and has started a public consultation period which ends on 1st May 2009.

A stakeholder meeting will be held in Brussels on 28th April 2009.

The Baltic Sea RAC has discussed the contents of a future plan for the management of Baltic salmon and proposes the following.

Main goals

Salmon stocks in the Baltic Sea and its rivers shall be managed and protected within safe biological limits and the genetic variability should be safeguarded.

Fishermen (commercial and recreational angling) in the Baltic Sea and its rivers shall be able to utilize the fishing possibilities arising from the positive results of a sustainable management of the Baltic salmon stocks.

Science and research on salmon and sea trout shall be further developed in cooperation with the stakeholders in order to safeguard a sustainable utilization and management of the Baltic Sea salmon. The WG would, however, like to stress that the lack of specific research should not hinder the development of progressive management of salmon in the Baltic Sea and the implementation of the EC Baltic Salmon Management Plan.

The management plan

A management plan for the Baltic Sea salmon is needed to safeguard weak populations, to support a further recovery of the salmon stocks to a sustainable level, and to increase the fishing possibilities which follow from an improved situation.

A plan is needed to create a holistic view of necessary action, to coordinate transnational and national activities, and to create a management framework which is relevant for the whole Baltic Sea region.

It is also stressed that spatial planning shall support the management plan in fisheries dependant areas.

The challenges of a management plan are that it includes both exclusive EU competences, or ditto MS competences, or a mixture of both. Actions under inter alia the Baltic Sea TAC are to be decided commonly, and actions under fishing regulations in coastal waters and rivers are within the competence of Member States (MS). Actions under science and fisheries control are also mostly decided at MS level, as are also water court decisions.

In order to create an efficient management plan with clear areas of responsibility, the European Commission should be able to clarify which of the proposed actions are clearly within the competence of individual MS and which are within the competence of the European Commission.

For its implementation the management plan needs financial support for science, control and other common activities. A structure for the financial aid to support and implement required common action needs to be developed. Actions under the CFP or other EU funding regulations are directed to MS, but are not for common action.

The new management plan for salmon relates also to the future new strategy for the Baltic Sea region. Common action should be financed by common financial structures.

Outcome of discussion on matters concerned

The Commission has raised several questions in its consultation paper and many of them will find their answers in the earlier BSRAC recommendation. Others are commented on below.

River inventories (to distinguish between strong and weak populations)...

A further improvement of salmon stocks, especially in weak rivers, demands renewed inventories. The inventory should inter alia identify all problems that hamper successful spawning or the further development of the salmon populations in the rivers concerned. If needed, the new inventory should also include a revision of the assessment goals. The inclusion of environmental concerns and habitat restoration stresses also the need to designate lists of salmon rivers based on these inventories.

On top of this, salmon river management plans are needed (proper monitoring of spawners, migrating activities, smolt protection of habitats...).

Overall TAC...

The salmon lifecycle, with its migration between the sea and rivers, requires a proper management with control of fisheries activities both in open-sea, coastal areas and rivers, and therefore an overall TAC should include all salmon fishing activities. Recreational fishermen shall be registered and be responsible for catch reporting systems to the same extent as commercial fisheries today. When including these in the TAC, their estimated unreported catches should be added to the TAC.

New control schemes shall cover all user groups.

A condition for an overall TAC is also that the allocation between user groups is based on the method of historical records, and the allocation key should remain the same. The aim is to maintain a balanced sharing of existing fishing possibilities.

Production targets...

Setting up any new targets has to involve a corresponding road plan and the appointment of needed funds. Restored rivers with higher production levels and increased fishing possibilities are in the interest of all user groups.

A realistic approach to the time frames is needed in order to avoid creating wrong assumptions and expectations on the further development of salmon rivers and salmon populations. Since the proposals include restoring the disturbed rivers, habitats as well as weak populations, current planning, permission to restore, restoration activities and all improvement processes will be time consuming.

Against this background a time frame of five years is very short. A more realistic time frame for the big rivers could be by 2020.

Targets for the minimum number of spawners per river...

The EU should require MS to set up clear goals for the minimum number of spawners per river for all wild salmon rivers in the Baltic region. As the socio-economic study has indicated, a further reduction in fisheries effort would not be the most cost efficient enhancement of salmon reproduction in rivers, and that is why emphasis should, in this case, be on other threats, e.g. on improving post smolt survival.

Additional technical measures...

Existing minimum landing sizes shall be kept. Returning female wild spawners above the landing size of 10 kg (e.g. second cycle spawners) should be released in inland waters and rivers with wild salmon. The target is to safeguard individuals carrying most of the genetic diversity of the population.

To support the return of all genetic forms with different homing schedules, all inland and river fisheries shall have closed periods e.g. seven days per month across the whole season, and be organized in an appropriate way.

The Baltic salmon management plan should include requirements for coherent harvest management schemes in different parts of the Baltic Sea. That will ensure a better escapement of migrating salmon to native rivers in this area.

Improving fishways...

One of the most important actions to improve this situation would be to enhance the proper functioning of fishways. The EU should with reference to the Habitats Directive, require MS to guarantee that at least 50 % of the returning native stock that has entered the river will have a chance to enter across obstacles in order to reach breeding areas.

Improvement of control measures...

To prevent further mismanagement of catch reporting pertaining to existing differences in the minimum landing size, further efforts must be made to clarify and distinguish between salmon and sea trout.

Rearing techniques....

Improvements in rearing techniques or an intensified campaign to restore genetic diversity are needed. These actions could have considerable benefits for increased post-stocking survival, but since they can also be connected to increased costs, a cost-effective approach needs to be adopted.

Voluntary releases of salmon in rivers...

In the case of weak populations, where there are no other alternatives for stock recovery, the practice of restocking can be accepted if it does not threaten the recovery of wild salmon populations.

Original genetic composition with high diversity should be guaranteed in all kinds of release activity. As early a life stage as possible should be used in releases, as this will promote needed lifeskill adaption to the natural environment and put the stocked fish under natural selection instead of hatchery selection.

Other research areas...

The EC should initiate a scientific assessment of the pros and cons of all salmon release programmes in the Baltic Sea (inter alia socio-economic and biological factors) in relation to the survival of all wild salmon populations in the coming 25-100 years.

Evaluate and develop the potential of sustainable salmon fisheries in terminal areas, where the acceptable proportion of native salmon is limited to a few percent.

Governance...

In order to make the new management plan for salmon a success, the management plan should clearly deal with the governance issue. As a general remark, one can say that the knowledge on how to improve the salmon stocks in the Baltic Sea is already there, but a clear division of responsibilities should be made and mentioned.

Priority activities need responsible lead parties, and some even require common action between national authorities and other stakeholder groups.

Restricting commercial fisheries was a main issue in the old SAP. The new plan should involve much more of the real stakeholders who can contribute to a relevant improvement of the salmon stocks; inter alia experts on rearing activities and genetics, experts on habitat restoration, the involvement of stakeholders who have had a clear negative impact on water quality in river basins, the involvement of recreational fishermen, who were never included in any administrative control system or catch reporting system, or official control systems.

Separate sea trout management plan needed...

In order not to delay the finalisation of the salmon plan, a management plan for the sea trout should be done separately.

Further involvement of the Baltic Sea RAC

The Baltic Sea RAC and its Working Group on Salmon and Sea trout appreciates its role as a regional advisory body to the European Commission and the Member States. In this role it sincerely hopes that the viewpoints expressed by the advisory body are considered and taken into account when the Commission works with a new management plan. Continuous consultation is anticipated, and the Baltic Sea RAC should preferably be involved in the monitoring of the implementation of the plan.

The BSRAC thinks that the future follow-up of the salmon management plan needs a surveillance group. The BSRAC, strengthened with inter alia scientists and representatives from the member states, could be the right body on a macro regional level and serve this purpose well.