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DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

Director-General

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Mr Reine J. Johansson  
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**Subject: Recommendation from the BS RAC for the salmon management plan in the Baltic Sea**

Dear Mr Johansson,

Thank you very much for your letter dated 8 February 2012 providing us with the recommendation on salmon management plan in the Baltic Sea.

In response to your recommendation, I would like to comment on some of the points raised in your letter.

#### Scope and objective of the proposal

The objective of the proposal as stated in Article 4 is to ensure the exploitation of the Baltic salmon stock in a sustainable way and to safeguard the genetic integrity of the salmon stocks. As regards BS RAC proposal to add another objective to the plan so that fishermen could utilize fishing opportunities arising from the positive results of sustainable salmon management, it can be said that such proposal is not an objective of the plan as it is more of a consequence arising from the good management. Once the salmon stock is managed at the sustainable level, this means that the stock is recovered and therefore the fishing opportunities are increased. Fishermen either at sea or in rivers can directly benefit from such an increase by having higher catch limits.

The Commission proposed to have one salmon stock in the Baltic Sea as the scientific basis to have two stocks in the Baltic Sea is weak. Salmon from the Gulf of Finland migrate to the Main Basin and vice versa. Recommendations for ICES's own future work also state that salmon from the Gulf of Finland will be assessed together with salmon from the Main Basin and the Gulf of Bothnia.

#### Targets for wild salmon rivers

We do not adhere to the opinion of the BS RAC regarding the unrealistic targets of the salmon management plan. ICES has indicated that the current smolt production of all assessment units is estimated to be 65-70%. This is only 5-10% away from the proposed

targets to be reached within 10 years. The Commission therefore believes that the targets and the timetable are realistic even for the southern Baltic rivers' populations. Furthermore, contracting parties to the HELCOM Convention already agreed to establish a target of 80% to be reached by 2015 as mentioned in the Baltic Sea Action Plan.

### TACs at sea

Salmon at sea are mixed and consist of specimens from different rivers with higher or lower potential smolt production, therefore it is impossible to set a harvest control rule at sea for each of the stocks. Nevertheless, when the value of fishing mortality was being estimated by scientists, rivers with higher and lower smolt production levels were taken into account.

In 2009 and 2010 the total amount of fishable salmon that were on the feeding ground for their second, third or fourth winter was estimated to be around 1.7 million salmon. The commercial reported catch in 2009 from this stock was around 150 000 corresponding to an F of 0.1. The TAC in the main basin (310 000) however corresponded to a significantly higher F of 0.2 but only 45% of the TAC was utilised. Assuming that discarding and unreported catches will stay in the same range an F of 0.1 would likely result in a wild salmon stock size that produces the maximum sustainable yield in accordance with the targets and timeframes proposed, as has been estimated by ICES.

The area where river ends and sea begins is not defined in the proposal. The definition is laid down Water Framework Directive to which Article 2(1) of the proposal refers. According to this Directive, river means a body of flowing inland water, while inland water is defined as standing or flowing inland water on the landward side of the baseline of which the breadth of territorial waters is measured. Therefore, from the context of those two definitions it shall be understood that the boundary between the river and the sea is a baseline, which Member States define according to the provisions of international law.

### Releases

A number (43) of scientific studies focusing on genetic composition of salmon in the Baltic Sea have been conducted for the last 30 years. The results of those studies indicated that the hatchery strains exhibited lower levels of genetic variation than the wild populations and genetic structure of hatchery populations was less pronounced when compared with wild populations. Genetic homogenization caused by reared salmon is well documented in Swedish rivers. The introgression rates from hatchery stocks into the native population are estimated at 5-25%, causing a trend of genetic homogenisation over a decade.

Other studies indicate that the "genetic pollution" (spread of genes to other rivers) caused by compensatory releases can be as high as 10-25%. In Swedish rivers it has been established that the straying rate varies between 1 and 35%.

Having in mind these effects, the Commission had requested ICES to provide the advice on releases of reared salmon. They concluded that such releases need to be taken into account in the management plan by including measures to reduce or eliminate the adverse genetic effects of reared salmon on weak wild salmon populations. Article 14 is proposed exactly for this purpose. It is also in conformity with the precautionary principle that the management plans are to be based on.

### Fin clipping

The purpose of fin clipping is to distinguish reared salmon from the wild. According to the salmon management plan the releases may include smolts and earlier life stages. If earlier life stages of salmon are to be released, it might not always be possible to clip the fins. Therefore some reared salmon may no longer have visual features distinguishing them from wild individuals and for this reason the usefulness of such measure becomes diminished and may no longer serve the intended purpose.

Finally, I would like to mention that the Commission conducted an extensive impact assessment of the proposed regulation on salmon management plan before it was adopted. The background information and the reasons why one or the other measure is proposed in the regulation can be found in this impact assessment.

The Commission proposal is now under consideration by the European Parliament and the Council. I thank you for your continued interest and constructive input.

Yours sincerely,



Lowri Evans