

- European Commission
- Member States around the Baltic

Date: 30th June 2009

BS RAC recommendations for the fishery in 2010

Please find enclosed the BS RAC recommendations on the fisheries for Baltic Sea fish species in 2010. The BS RAC encourages the Commission and Member States to take these recommendations into account when preparing and deciding on the regulation of the Baltic Sea fisheries in 2010.

We also have some additional comments which we would like to make here.

With respect to demersal species, a proposal was put forward at the BS RAC ExCom meeting on 23rd June to carry out a project on selectivity in the cod fishery. There was consensus to start such a project, which would include:

- Creating a project group,
- Involving the fishermen,
- Creating a reference fleet,
- Incorporating the latest data,
- Building on the positive results achieved with respect to IUU fishing, and
- Involving the participation of national research institutes.

We count on the support of DG Mare with this project, and look forward to receiving guidelines on how it can be financed and how to proceed. A project proposal will be forwarded to DG Mare as soon as possible.

On Western Baltic herring the BS RAC has not yet been able to make a recommendation, because the advice was not available at the time. We would like to thank the Commission for taking our particular situation into account and for extending the deadline for the BS RAC to come with a recommendation at the beginning of September. However, we would also like to express our concern

about the actual timing of the process. This applies to the timing of the ICES and the STECF advice and of the proposal. We would request that the Commission asks ICES and STECF to come forward with their advice earlier, so that it is presented together with the advice for the other stocks in the Baltic.

During the discussions on salmon, the ExCom was unanimous in rejecting the ICES advice put forward for 2010. It was pointed out that BS RAC members were unable to attend the ICES Working Group on salmon. For the sake of transparency and greater stakeholder involvement, we would strongly urge DG Mare to change this process and to request that ICES makes the salmon WG open to members of the RACs and other stakeholders.

Kind regards,



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c.c. Fisheries Council of the European Community, European Parliament, Community Fisheries Control Agency, ACFA, ICES and HELCOM.

BS RAC recommendations on the fisheries for species in the Baltic for 2010

This paper contains the BS RAC recommendations on the fisheries for Baltic Sea fish species in 2010. The recommendations were prepared by the three BS RAC working groups and their chairmen (Demersal, Pelagic and Salmon/sea trout), and were finalised and approved by the Executive Committee at its meeting on 23rd June 2009 in Vaasa.

Demersal Species: Introduction

On 9th June 2009, the Demersal Working Group of the Baltic Sea Regional Advisory Council was presented with the ICES advice for the fishery of the Baltic demersal fish stocks in 2010. The presentation was made by the Vice-chair of the ICES Advisory Committee, Dr. Carl O'Brian.

The Communication from the European Commission on fishing opportunities for 2010 was subsequently presented by Ms. Stephanie Schmidt of the Commission.

The Demersal Working Group was pleased to note that the level of misreporting has reduced considerably, although some reservations were expressed about the actual level estimated by ICES. The Baltic RAC reiterates its previous commitment on IUU fisheries and the political confirmation made at the Ministerial meeting in Copenhagen in 2007.

The Demersal Working Group, once again, discussed the implications of managing cod in the Baltic in two separate units. In particular, in the present situation, where the Eastern stock grossly outnumbers the Western stock, there will be an increasing overlap in the distribution of the two stocks.

Regarding the fishery for 2010 there was agreement to propose a unanimous recommendation for the demersal fishery in the Baltic in 2010.

Recommendations

Cod TAC

For cod, BS RAC members recommend setting a TAC in agreement with the management plan that was recently evaluated by ICES as being in accordance with the precautionary approach. The BS RAC therefore recommends setting the TAC for cod in 2010 in the Western Baltic (Subdivision 22-24) at 17 700 tonnes, and in the Eastern Baltic (Subdivision 25-32) at 56 800 tonnes.

Effort

Although the management plan stipulates that effort should be reduced in the Western Baltic cod fishery, the BS RAC would like to highlight to the Commission that in view of the improving status of the cod stocks, it is pertinent that future effort regulation/fishing days in the plan pays special attention to the small-scale fisheries. Small vessels fishing with static gear or small trawls need to be able to use the available fishing days to the full extent. The BS RAC holds the view that this segment needs special attention with less rigid regulation.

For the fishery in 2010 the majority of the Baltic RAC members recommend a derogation for vessels below 12 m in the sense that they should not be subject to the effort reduction that is stipulated in the plan. Vessels below 12 m should thus be allocated the same number of days-at-sea as in 2009. Two organisations abstain on this point.¹

The BS RAC members recommend that a derogation from the effort-regulation for 220 mm mesh is also needed in order to sustain traditional fisheries for turbot and lump-fish. That fishery is mainly conducted by the same segment of the fishing fleet.

For the Eastern cod, the TAC proposed matches a fishing mortality that is far below the target mortality, and no reduction in effort should be imposed. Nevertheless, small-scale fisheries in the Eastern Baltic are also suffering from the restrictive day-at-sea scheme, and the upcoming revision of the plan will have to take this into consideration.

Plaice

There are no known signs of plaice being under too high pressure in the Baltic, and the BS RAC advise a roll-over of the TAC for 2009.

Pelagic species: Introduction

On 15th June 2009, the BS RAC Pelagic Working Group was presented with the ICES advice for the fishery of the Baltic pelagic stocks for 2010. The presentation was made by Steen Christensen. Peter Hopkins of the Commission presented the Communication from the European Commission on fishing opportunities for 2010.

The ICES advice confirmed the good state of the pelagic stocks. The BS RAC fisheries representatives also confirmed the very good state of all the pelagic stocks. This year will also see the recommendation of a long-term management plan for the Baltic pelagic stocks. The BS RAC looks forward to seeing the proposal from the Commission, and in the autumn 2009 will hold a Working Group on a long-term management plan for pelagic stocks in the Baltic. The fishermen look for stability in the fishery and for the correct spawning stock biomass levels for the pelagic stocks when the long-term management plan takes effect. The fisheries representatives expressed a strong wish for cooperation with the scientists, and recommended the creation of a reference fleet and observation programmes in order to provide as much information as possible for the scientists. The monitoring of stocks must be an important role for the scientists, and fast reactions will be needed.

¹ WWF and the Fisheries Secretariat

Recommendations

Herring in Subdivision 22-24

The BS RAC regrets that the scientific advice from ICES for this stock is not yet available. Thus the BS RAC has not been able to put forward a recommendation in this paper. The BS RAC would like to underline that this is not a satisfactory situation, and asks the Commission to request that in future, ICES provide their advice for herring in Subdivision 22-24 at an earlier date, together with the advice for the rest of the Baltic stocks. It has the agreement of the Commission that it will formulate and send a recommendation by the beginning of September.

Herring in Subdivision 25-29 and 32 (excluding Gulf of Riga herring)

The ICES advice for the herring TAC is 103 000 tonnes.

The BS RAC recommends a roll-over of the TAC for 2009 of 143 609 tonnes. Two BS RAC members do not support this recommendation; they propose a 15 % reduction in the TAC for this stock.²

Herring in Subdivision 28.1 (Gulf of Riga)

The ICES advice for the herring TAC is 33,400 tonnes.

The BS RAC recommends a roll-over for 2009 with a TAC of 36 400 tonnes.

Herring in Subdivision 30-31 (Bothnian Sea)

The ICES advice for herring in SD 30 + 31 is 109 600 tonnes.

The BS RAC proposes that the TAC for herring in the Gulf of Bothnia should be 109 600 tonnes, in line with the ICES advice.

ICES points out that the stock is being harvested sustainably. ICES also maintains (see section 8.3.3.1b) that there has been a decreased mean weight-at-age in the stock, caused most likely by climate induced changes in the food web, as well as stock density dependent effects which have impacted the value of the catch. This could also increase the dioxin content of the fish caught. (The Finnish representatives have put these the points forward earlier.) ICES concludes that reduced growth rates caused by density dependent effects are likely. The exceptionally large year class of 2002 and the large new year class identified for 2006 will increase the effects of the large numbers of herring individuals. This would allow for an increase in fishing and a decrease of the density. The spawning stock biomass would still remain at a very high level. The justifications for such a proposal and a slight deviation from the maximum change rule of 25 % (Category 1 stock exploited at the maximum sustainable yield in Annex II of Commission's Consultation on fishing

² WWF and the Fisheries Secretariat.

opportunities for 2010) are more than solid. The element of density-dependence should be catered for in the rules for setting TACs.

Sprat in Subdivision 22-32 (Baltic Sea)

The ICES advice for the TAC is 306 000 tonnes.

The BS RAC recommends a rollover of the 2009 TAC of 399 953 tonnes. Two BS RAC members do not support this recommendation; they propose a 15 % reduction in the TAC for this stock.³

The BS RAC recommends that the TAC for sprat should be maintained at at least its current level of 399 953 tonnes, and not reduced to 306 000 tonnes, as proposed by ICES. The main reasons for this are to be found in the ICES response (8.3.3.1d) to the requests on ecosystem effects of a reduction in the size of the sprat stock. The modelling performed by ICES and current knowledge indicates that increased sprat fishing would:

- 1) decrease sprat SSB to an on average stable level and increase sprat growth and improve their condition;
- 2) slightly increase the SSB of cod (naturally also dependent on cod fishing and environmental conditions);
- 3) increase herring SSB and growth and improve their condition, and
- 4) increase total summer zooplankton and decrease phytoplankton biomass (algal blooms).

These effects would all be beneficial both for fish stocks and the marine environment (in line with the cod management plan and the HELCOM Baltic Sea Action Plan). Although there are many sources of uncertainty, there is sufficient knowledge and indications for a decision to maintain the sprat TAC at its current level. This would only reduce the sprat SSB slightly towards a stable level that in the scientific literature has been identified for cod dominance.

Recommendation for Salmon

Until now, the ICES advice for salmon has been built on the management objectives of the Salmon Action Plan, adopted in 1997 by the former IBSFC.

The EU Commission has initiated work on a new management plan for salmon in the Baltic, in which BS RAC has participated actively, as well as ICES. No decision has yet been taken, and a proposal from the Commission has not yet been published.

In 2004, ICES recommended a TAC of 410 000 pieces in the Main Basin and the Gulf of Bothnia. Today they recommend a TAC of 133 000 for 2010, in spite of the fact that most figures point to healthier stocks! The reason seems to be that suddenly, in the middle of this process of producing a

³ WWF and Fisheries Secretariat

management plan, ICES are altering their management objectives for the advice for 2010. The BS RAC understands that ICES has taken a management position ahead of the management institutes, instead of a traditional biological assessment in relation to already decided management objectives.

The BS RAC considers that the TAC for 2010 should build on the management objectives of the Salmon Action Plan, until a new management plan is adopted.

The fishermen around the Baltic utilized only 35% of the TAC in 2008, due primarily to the drift net ban (for the alleged protection of harbour porpoises). Only Sweden and Finland used over 50% of their national quota, as the fishermen in these countries are also able to fish with trap nets.

The TAC must reflect the status of the stock and not the actual fishing. The TAC is divided between the countries according to the principle of relative stability. By advising a TAC that equals the actual, annual total catch, ICES should have understood that the catches for 2010 will be much lower, maybe around 70 000 - 80 000 pieces. The artisanal trap net fishery in the Gulf of Bothnia (Sweden and Finland) has to stop in the middle of the season due to the fact that the national quotas are used up, while fishermen from other parts of the Baltic have few alternatives to the drift net and cannot use their quota.

The scientific foundation still seems very weak for the alleged low at-sea survival, that also forms part of the background for the advice.