

Director General
Ms. Lowri Evans
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Belgium

Date: 2nd September 2011

BS RAC recommendations for the salmon and sea trout fishery in 2012

Dear Lowri Evans,

The Baltic Sea Regional Advisory Council is grateful for the opportunity to respond to the consultation on the TAC for Baltic salmon 2012. We would also like to thank the Commission for granting the RAC an extension on the timeframe to produce a response.

The BS RAC held a Salmon Working Group meeting on 17th August 2011 with ICES representatives to discuss the WGBAST report and the advice for salmon and TAC for 2012. Commission representatives also took part at this meeting. A full report from the meeting with ICES will be made available on the BSRAC website and sent to the Commission as soon as possible.

The meeting was productive and gave a better understanding of the advice, e.g. on the model and the data used. However, the discussions also left some issues in need of further review, especially the issue of misreporting in the Polish salmon and sea trout fishery and how to determine potential smolt production capacity in the different rivers of the Baltic.

BSRAC members did not reach a consensus position on salmon and sea trout. Attached to this letter is a paper which contains the views of the representatives from fisheries sector, and views from representatives from the other interest groups.

Kind regards,



Reine J. Johansson
Chairman of the BS RAC



Ewa Milewska
Vice-Chair of the BS RAC

Copied to Member states, Fisheries Council of the European Community, European Parliament, CFCA, ACFA, ICES, HELCOM and Russian fisheries representative in Copenhagen

BSRAC fisheries representatives recommendations on the salmon TAC for 2012

Up until the advice for 2009, the ICES advice has built on the management objectives of the Salmon Action Plan which was adopted in 1997 by the former IBSFC (International Baltic Sea Fishery Commission).

The EU Commission has initiated work with a new management plan for salmon in the Baltic, and the BS RAC has participated actively in this, as has ICES. No decision has been taken so far on a new management plan.

We understand that ICES has adopted a management position ahead of the management institutes, instead of producing a traditional biological assessment in relation to decided management objectives. We consider that the TAC for 2012 should build on the management objectives of the Salmon Action Plan until a new management plan is adopted.

In 2004, ICES recommended a TAC of 410 000 salmon. For 2012 they recommend a TAC of 54 000. This is a decrease of 87%. The ICES advice for 2012 is a decrease of 78% compared to the TAC for 2011 and a decrease of 62% (not 50%) on reported catches for 2010.

What has happened since 2004? Have the stocks collapsed? No. Have the stocks decreased? No, on the contrary, they have increased. Has M74 increased? No, it is still very low. Has reproduction failed? No, on the contrary. Since the adoption of the Salmon Action Plan, reproduction has increased almost tenfold in the big salmon rivers in the Gulf of Bothnia.

In the WGBAST report from 2007, the potential wild smolt production was estimated to be 2 267 000 compared to an actual 1 587 000 in the Gulf of Bothnia (where almost all reproduction takes place), and was predicted to be 1 730 000 in 2010.

In the WGBAST report for 2011, the potential wild smolt production is estimated to be 3 438 000 in the same area and the actual production in 2010 is 2 349 000!! In other words, the production is even higher than ICES estimated to be possible four years earlier, and still they claim that it is unlikely that the management objectives will be fulfilled and recommend a huge decrease in the TAC!

During these past four years, ICES has increased the estimated potential capacity by more than 50%, with the help of “expert opinions,” model assumptions and new data. This ongoing increase in estimated capacity in order to describe the salmon situation as not healthy is no longer trustworthy.

The TAC must reflect the status of the stock and not the actual fishing. The TAC is divided between member states according to the principle of relative stability. We would point out to ICES that by advising a TAC of 54 000, the catches in 2012 will actually be much lower, maybe around 25 000 - 30 000 pieces. The artisanal trapnet fishery in the Gulf of Bothnia (Sweden and Finland) will be stopped at the beginning of, or before the season, due to the fact that the national quotas are filled, while fishermen from other parts of the Baltic have few alternatives to the driftnet and will not use their quotas. (The Swedish quota will be decreased by 78% compared to reported catches in 2010!!).

The scientific foundation seems still be very weak for the alleged low at-sea survival for the **wild** salmon, which also forms a background to the advice. The major information comes from the return of Carlin tags, but the old tradition of returning these from the fishermen to the scientists has been lost for different reasons. It is well known that the at-sea-survival of the **released** post-smolt is low and declining, and the reason seems to be new rearing techniques and high-fat feed. Against this background, the model assumption that the at-sea-survival for the wild salmon is similar to the released salmon seems odd. In 2008 the BSRAC drew attention to the low at-sea-survival for released salmon in a letter from 2008 to member states, and asked for immediate action to resolve the problem.

In its advice for 2011, ICES maintains that the main reason for the recommended cut in the TAC is due to a 50% decline in pre-fishery abundance of the salmon stock. This is true for all salmon at sea. However, ICES own tables show that the pre-fishery abundance of **wild** salmon has not decreased; it is the abundance of reared salmon abundance that has decreased substantially.

The new element in this year's advice is the estimate of unreported catches, primarily from Poland. ICES claims that Polish catches are 76 000, instead of a reported catch of 5 700. ICES has compared Polish CPUE in the longline fishery with Danish, Swedish and Finnish, although they are not fishing in the same area; Polish fisherman are fishing closer to the coastline. We regret that ICES did not ask the Polish administration for better basic data, instead of including this obviously false assumption in the foundation for the advice. At the BSRAC WG meeting on 17th August 2011, the Polish administration presented totally different catch figures for sea trout and salmon, and put forward a plausible explanation for their reported catches of salmon; it is mainly sea trout that is being caught. The BS RAC is strongly against any IUU fishery and will continue to act proactively to establish the Baltic Sea fisheries as a good example of a sustainable and well-managed fishery, but we cannot accept ill-founded assumptions as the foundation for the advice.

The BS RAC fisheries representatives recommend a rollover of the 2009 TAC for salmon while awaiting a new management plan and new calculations from ICES.

FISH, CCB, WWF, EAA, FANC and ASECO minority statement for BSRAC recommendations on 2012 Salmon TAC in the Baltic Sea

In summary, we support the reductions of TAC and other recommendations proposed in the salmon and sea trout advice by ICES. Our group of BS RAC members finds the ICES advice is well argued and balanced to the current trends. The TAC should be set at 54 000 salmon in the Main Basin and maximum 12 000 salmon for Gulf of Finland. This will give a real reduction in fishing that has been needed for many years. Decreasing smolt survival, the reduced number of returning spawners and large amounts of unreported/unknown catches and discards argue for a lower TAC for 2012.

A summary of the deliberations is given in more detail below:

- A) The misreporting of catches and illegal fishing must be halted as far as practically feasible, the Polish explanations to the very high effort data and low CPUE are not satisfactory,
- B) Post-smolt survival is now at such a low level that stringent measures are called for to prevent extinction of populations, both in short and longer terms,
- C) Past years and this year show a big reduction in returning adult salmon spawners in the monitored rivers,
- D) It is vital that management of salmon and sea trout are linked, which is important for the genetic survival of numerous sea trout populations and which will raise the awareness that better data is warranted to manage sea trout populations in future,
- E) Inadequate data and too many unknown factors (unreported, by-catch, recreational fishery, discards etc) is a major obstacle to most evaluations of current problems and possible improved management.

ICES TAC advice for Salmon and Sea trout 2012

ICES advice suggests that no more than 54,000 salmon be caught in 2012 (according to the MSY approach) in the Main Basin. This means a 50 % TAC reduction in compared to the advice given in 2010. In the Bay of Finland ICES propose a TAC of 12 000 salmon and no catch of wild salmon.

For sea trout no specific advice is given (no TAC) but it is stated that “ICES advises that immediate fishing restrictions...be enforced in the Gulf of Bothnia and the Gulf of Finland, to safeguard the remaining wild sea trout populations in the region.”

A reduction of fishing effort may help to change the trend for the declining stocks of salmon and sea trout but there are worrying trends that must be addressed with other measures as well. We want to underline the following:

- 1) According to ICES there is an IUU problem in the salmon fishery. ICES estimate that in 2010 70,000 fish were caught but not reported, which makes up close to 37 % of the catch in the Main Basin and some 24 % of the total catch. This IUU catch is completely unacceptable. Improved control of poaching is acutely needed, also to be implemented in the Gulf of Finland.
- 2) We are not satisfied with the explanations to the strange effort data and reported catches given by the Polish administration. We expect to see more evidence to explain the official data given to ICES. If the unreported fishing of salmon really turns out to be sea trout and not undersized salmon caught by Polish fishermen, the quota should still be substantially reduced. The fishery has to adapt to declining stocks, but it is of course difficult to make drastic cuts.
- 3) Post-smolt survival has declined to a level of 10% (both for wild and reared salmon). This fact must be addressed by means of more scientific studies, better data and by gathering forces around the Baltic to find answers to the main driving forces behind this phenomenon. The figures are approaching the level of extinction for wild salmon, and probably also for wild sea trout. This survival rate is almost equal to the worst scenarios of the M74 disease

which was once considered a major threat to salmon survival in the Baltic. This decline explains the lower number of spawners returning to their native rivers in 2010 and 2011.

- 4) The ICES salmon report shows that substantial numbers of salmon (est. 200 000 salmon) are being caught in the Baltic pelagic fishery (p 121 in WGBAST report 2011). This affects the estimates of smolt survival with approx. 5% in total. Also large salmon are being caught in this fishery. This by-catch does not explain the trend in post smolt survival or lower returning salmon spawners, but it remains a part of the explanation that needs to be further investigated.
- 5) The historical TACs have little relevance for the actual catch. Preliminary data for 2010 indicates that coastal fisheries have decreased by 31 %, and in river fisheries by some 39 % compared to 2009. In total, only half of the salmon TAC was utilized in 2010, even though the offshore fishery increased by 39 % in the same period. In addition, catch data have only marginal importance for the problem caused by mixed offshore fisheries (longlines) where management of weak wild populations of both species is impossible and threaten to drive them even faster towards extinction.
- 6) As far as possible, salmon and sea trout populations must be managed on a river by river basis, and that is particularly important for the vast majority of weak river populations where there is a long way to reach recovery. These small populations are also particularly vulnerable to poaching in the rivers and river mouths in addition to the lack of environmental measures to improve the quality of their migration routes and spawning areas in the rivers. These conditions indicate that the recent strong increase in the longline fishery, which now approaches the combined harvest rate of the previous longline and driftnet fisheries, must stop and decrease. Technical demands on this fishery are also badly needed, e.g. new rules on hook size and hook type, seasonal closures.
- 7) Most of the problems that face the salmon also face the sea trout, but trout biology is more varied than that of salmon and obviously more difficult to handle on a general level. Sea trout of some populations, normally in rather big rivers, may migrate almost as far as salmon populations, whereas most populations from small rivers and brooks tend to migrate only close to the river mouths (up to some 150 km from the home river) before they return to spawn. The average size of sea trout also differs among populations, but enforcing a minimum legal size of 65 cm, as advocated by ICES experts, would certainly allow all female fish to spawn at least once. Also, this legal size limit would ensure a better management option than the so far non-existing TAC.