

BSAC recommendations for the fishery in the Baltic Sea in 2025

The BSAC recommends setting the catch levels for the Baltic stocks in 2025 at the values indicated in the table below. For divergent positions, a list of members subscribing to the specific minority position is indicated as a footnote. For all stocks, the recommendations are formulated and agreed after careful consideration of the scientific advice.

Stock	ICES advice on fishing opportunities 2025 ¹		BSAC recommendation for EU TAC 2025	BSAC minority positions TAC 2025
Cod SDs 22-24	24 t (commercial and recreational catches)	Precautionary approach	Bycatch TAC 340 t (roll-over of 2024 bycatch TAC)	<ul style="list-style-type: none"> • 0 t² • 340 t (passive gears only)³
Cod SDs 25-32	0 t (roll-over of the advice)	Precautionary approach	Bycatch TAC 595 t (rollover of 2024 bycatch TAC)	<ul style="list-style-type: none"> • 0 t⁴ • 595 t (passive gears only)⁵
Plaice SDs 22-32	SD 21-23: 20,062 t (+16% compared to previous advice) SD 24-32: 5,303 t (+18%) SDs 22-32: 20,079 t	SD 21-23: MSY approach SD 24-32: MSY approach	SDs 22-32: 20,079 t (MSY approach)	<ul style="list-style-type: none"> • Prioritise protection and recovery of both Baltic cod stocks by setting the plaice TAC well below 7,106 t⁶ • 7,106 t (passive gears only)⁷
Herring SDs 30-31	Advice postponed until September		n/a	n/a

¹ Note that reference is made to ICES headline advice only. More details and nuances may be found in the “Issues relevant for the advice” section of the ICES advice.

² BalticWaters, Baltic Salmon Rivers Association, Coalition Clean Baltic (CCB), Finnish Association for Nature Conservation (FANC), Fisheries Secretariat, World Wide Fund for Nature (WWF). Joint NGO recommendation [Joint NGO recommendations on Baltic Sea fishing opportunities for 2025 – FishSec](#)

³ Low impact Fishers of Europe (LIFE)

⁴ BalticWaters, Baltic Salmon Rivers Association, CCB, FANC, Fisheries Secretariat, WWF

⁵ LIFE

⁶ BalticWaters, Baltic Salmon Rivers Association, CCB, European Anglers Alliance (EAA), DAFV, FANC, Fisheries Secretariat, WWF

⁷ LIFE

Herring Gulf of Riga SD 28.1	30,394 t - 45,235 t (+ 10% compared to previous advice)	EU multiannual plan (MAP) for the Baltic Sea	41,635 t (calculation for the management area based on MAP F_{MSY})⁸	<ul style="list-style-type: none"> • ≤ 32,796 t Consider setting the TAC within or below the lower F_{MSY} range in order to build ecosystem resilience⁹ • 32,796 t¹⁰
Herring SDs 25-29, 32	95,340 t – 125,344 t (+129% and 139% compared to previous advice)	EU multiannual plan (MAP)	Total TAC 125,344 t (EU MAP) EU TAC = Total TAC - Russian share of 9.5% + 861 t – 3263 t = 111,034 t	<ul style="list-style-type: none"> • n/a - Due to the degraded state of the stock and high uncertainties a group of OIG cannot provide a quantitative catch recommendation, but fishing pressure should be minimised¹¹ • EU TAC 48,442 t (20% EU TAC increase)¹² • Total TAC 95,340 t = EU TAC 87,144 t¹³
Herring SDs 22-24	0 t (roll-over of the advice)	MSY approach and precautionary considerations	788 t bycatch TAC (rollover)	0 t¹⁴

⁸Calculation according to the formula provided in ICES advice: 39,233 tonnes (MAP F_{MSY}) – 861 tonnes (GoR herring taken in SD 28.2) + 3,263 tonnes (central herring taken in GoR) = **41,635 tonnes**

⁹ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, DAFV, FANC, Fisheries Secretariat, WWF

¹⁰ LIFE

¹¹ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, DAFV, FANC, Fisheries Secretariat, WWF

¹² LIFE

¹³ Sweden Pelagic Federation PO (SPFPO)

¹⁴ BalticWaters, Baltic Salmon Rivers Association, CCB, FANC, Fisheries Secretariat, WWF

Sprat SDs 22-32	130,195 t – 169,131 t <i>(-32% compared to previous advice)</i>	EU multiannual plan (MAP) for the Baltic Sea	<ul style="list-style-type: none"> • Rollover of 2024 EU TAC 201,000 t¹⁵ • Total TAC 169,131 t (MAP F_{upper}) EU TAC = Total TAC - Russian share of 10.08% = 152,083 t¹⁶ 	<ul style="list-style-type: none"> • < 117,071 t. Due to the mixing with the degraded herring stocks in the central Baltic the group of OIGs cannot provide a quantitative catch recommendation, but emphasise that the TAC should be set below the lower end of the F_{MSY} range¹⁷ • EU TAC 73,566 t (0.5 F_{MSY})¹⁸ • Total TAC 130,195t (lower F_{MSY} range of EU MAP) EU TAC (-10.08% Russian share) = 117,072 t¹⁹
Salmon SDs 22-31	0 salmon <i>(roll-over of the advice)</i> If sea fishing can be confined to existing coastal fisheries during spawning migration (beginning of May - end of August) in Bothnian Bay, total sea catch (commercial + recreational) in this area of no more than 40,000 salmon in 2025.	Precautionary approach	In accordance with the advice, 0 catch from the mixed-stock at-sea fisheries, and 40,000 salmon in the Gulf of Bothnia and the Åland Sea for both commercial and recreational fisheries	<ul style="list-style-type: none"> • A bag limit of one salmon (excluding recent spawners) per angler and day for sea anglers south of latitude 59.30 N + adaptive, ecosystem-based management plan²⁰ • n/a - Recommendation postponed until September 2024 once the information on the spawning population collected over the summer is available²¹
Salmon SD 32	9,440 salmon (-20%) corresponding to landings of 8,118 salmon	Precautionary approach	8,118 salmon	≤ 8,118 salmon²²

Please note that the recommendations relate to the TACs for the regulatory areas, not to the different stock components. Further explanation of how the recommendations for each stock have been reached is given in the text below.

¹⁵ National Chamber of fish Producers Poland, Fish Producers' Organisation Bałtyk Poland, The association of fisherman and fish processors "Baltijos zvejas" Lithuania
¹⁶ Danish Fishers PO (DFPO), Danish Pelagic PO (DPPO), Swedish Fishermen's PO, Finnish Fishermen's Association (FFA), Federation of Finnish Fisheries Associations, Estonian Fishermen's Association, European Fishmeal and Fish Oil Producers (EFFOP)
¹⁷ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, DAFV, FANC, Fisheries Secretariat, WWF
¹⁸ LIFE
¹⁹ Sweden Pelagic Federation PO (SPFPO)
²⁰ European Anglers Alliance (EAA), Deutscher Angelfischereverband (DAFV)
²¹ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, DAFV, FANC, Fisheries Secretariat, WWF
²² BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, DAFV, FANC, Fisheries Secretariat, WWF

General comments to the ICES advice for the fishery in the Baltic Sea in 2025

The recommendations presented here have been developed after the presentation of the ICES advice by ICES Vice-Chair of ACOM, Dorleta Garcia, and the following discussions, at the Joint Working Group held on 12th June 2024. A draft was sent for written input to the Working Group members and the Executive Committee members and was finalised by the Executive Committee on 27th June 2024. The recommendations were approved by written procedure according to RoP rule 32 on 5th July 2024.

This year more than ever, the BSAC acknowledges that the fishery in the Baltic is severely challenged. Some stocks are faced with either decreased advice or zero catch advice.

Changes in the ecosystem

The BSAC members are not in consensus on the levels that should be set for several of the stocks. However, **there is agreement in the BSAC** on the continued need to focus on the overall ecosystem, and the other factors that are affecting the well-being of certain stocks. Fishing is one of the factors that may have an influence on the stocks, although for several stocks in the Baltic fishing pressure is presently very low. Several other challenging developments are occurring at the same time, among other species interaction and climate change, eutrophication, and changes in salinity. Changes in ecosystem productivity in general raises the question of a regime shift. **The BSAC** is of the opinion that estimation and quantification of the effects of species interactions need to be undertaken urgently.

Over recent decades, the rapid growth of seal and cormorant populations have caused substantial challenges to fisheries in the Baltic. Seals and cormorants are considered one of the major threats to the profitability of fisheries sector in the region. The BSAC organised a workshop on predators (seals and cormorants) in October 2023. The objective of the workshop was to gain feedback on the legal rules and management measures related to seals and cormorants, on the status of populations, monitoring and interactions of seals and cormorants with fish stocks and fisheries. A follow-up workshop will take place in October 2024 with particular focus on concrete management measures at regional level.

Science and research

Science should make more effort to solve the problems of regime shift in the Baltic and species interrelations. There is a need for a more substantial reflection on socio-economic aspects and the future of the fisheries.

The BSAC underlines that the scientific advice is the basis for supporting and establishing the quality and appropriateness of management decisions, and to enable fishers to optimise the output of their efforts.

The BSAC is of the opinion that the current system of scientific advice should better reflect the changes in the ecosystem as well as such processes as predation, consequences of climate change, regime shift etc. and their impact on productivity of the ecosystem. Ongoing work in ICES WKNEWREF²³ and WKREBUILD²⁴ is therefore welcome. To this end the advice from science should include more options and include an explanation of the consequences of each option. The BSAC reiterates its call to include species interactions in the advice.

Dialogue and co-operation between scientists and fishers is very important and facilitates carrying out effective data collection programmes. Fishers are willing to cooperate with the scientists, and would like to see that the data they deliver is used in the decision-making process. Data on species interaction is missing and this is a problem, in particular for mixed fisheries management.

²³ [WKNEWREF \(ices.dk\)](https://www.ices.dk)

²⁴ [Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks \(WKREBUILD2\) \(figshare.com\)](https://www.figshare.com)

The BSAC had at several occasions raised the need to broaden the scope of stakeholders' involvement in the formulation of advice requests to STECF and ICES. **The BSAC** calls for greater transparency in requesting scientific advice by the Commission. The BSAC is of the opinion that engagement of stakeholders is needed at the very early stage of policy-making, when requests for advice are formulated. The formulation of requests greatly influences the output used by decision-makers since ICES advice is constrained by the framework of such request, as it is bound to answer the questions posed by requesters.

The BSAC repeats and underlines that dialogue and co-operation between scientists and fishers is very important and facilitates carrying out effective data collection programmes.

The BSAC reflects on the organisation of meetings in 2025 focused on the ongoing work in ICES ecosystem based management and change in productivity, developments in terms of mixed fisheries advice, and how to add scientific information to the stock advice that could be useful to managers.

Fisheries management

Fisheries management should follow rapid changes in the ecosystem. It is important to have an adaptive and fast decision-making process at regional level. The interactions between sea uses should be taken into account in fisheries management (such as dredging, sand and gravel extraction, offshore wind renewable installations).

An ecosystem-based fisheries management should also account for both the prey/predator relationship and harvesting patterns, and how environmental conditions affect the conditions of the stocks.

A clear call for action should be sent to the decision makers to come up with faster and more adaptive solutions. Delayed management actions are detrimental to effective management.

The BSAC recalls that an ecosystem-based fisheries management is about balancing human activities and environmental stewardship in a multiple use context, and about ensuring fish for the future²⁵.

Policies in place

From a larger perspective, **the BSAC welcomes** the upcoming evaluation of the CFP which may lead to its possible revision. The BSAC stands ready to draw on its expertise in order to deliver advice and input to the CFP evaluation later in 2024. The BSAC has at several occasions recommended a revision of the CFP to grant fishers greater flexibility in organising fishing activities, including gear selection, to ensure the best environmental and economic outcomes.

Selectivity in the fisheries

The limited commercial fishing opportunities for both Baltic cod stocks brought into focus the imperative need to use technical solutions to reduce the catch of cod whilst continuing fisheries for stocks that have good status. The matter is of utmost urgency for Baltic fishermen, who are at present prevented from using the existing resources.

²⁵ BSAC White Paper [White-paper-02-05-2022forprintandweb.pdf \(bsac.dk\)](#)

Cod SDs 22-24

The BSAC recommends that the 2025 TAC for cod in SDs 22-24 should be a rollover of the 2024 bycatch TAC of **340 tonnes** (commercial catches) and apply combined recreational fishing management measures to ensure stock protection but allow for continued angling for cod. Whilst recognising that cod catches should be kept as low as possible, the BSAC does not consider the bycatch TAC recommended by ICES to be realistic. It is a logical decision to continue to allow some cod to be caught in order to enable other fisheries to continue.

It is striking, that the very good recruitment from year class 2022 disappeared from the stock before they entered the fishable biomass, which was expected to happen in 2024. The reasons behind this must be investigated and if suspicions about cormorant predation being the cause of the extremely high natural mortality are confirmed, management of the fishery must take account of this and revise reference points accordingly.

The BSAC recommends evaluating the effectiveness of all the measures to protect cod spawning areas.

The fisheries representatives from Denmark²⁶ are of the opinion that the closure in SD 24 should be lifted as there is no spawning in this area and this is where and when fishers are able to catch plaice with no bycatch of cod.

The fisheries representatives from Poland²⁷ do not support the ICES advice for the western cod stock. In their view, the advice does not reflect all factors and changes affecting the stock, such as the population structure and interspecies dependence. In their view, inconsistencies in age interpretation prevent the estimation of fish growth and hamper adequate management advice. This has consequences both for stock assessment and fisheries management. The above-mentioned advice does not have the necessary features, i.e. specific age of fish, number of fish, the factors necessary to be introduced into the model. In their views, because ICES itself criticizes its model, it cannot be considered to be an advice.

Some fisheries representatives from Sweden²⁸ highlight that since the implementation of the fishing closures to protect cod spawning in 2021, the cod stocks have not recovered despite a significant reduction in fishing pressure, nor has the measures been evaluated. Moreover, this closure extends to pelagic fisheries as well. However, science is lacking to prove that pelagic fisheries impact cod during their spawning period. They believe this is enough to allow pelagic fishers to fish during the closures.

A group of OIG members²⁹ recommends that the TAC for 2025 should be set at zero for all targeted cod fishing in SDs 22-24. They recommend developing a rebuilding plan to ensure rapid recovery above B_{MSY} , increasing monitoring and control on all vessels using active gears in all areas but prioritised in cod concentration areas, combining both REM and traditional controls, setting the plaice TAC well below the respective single-stock headline advice in order to prioritise cod protection and recovery, ensuring that any vessels fishing for flatfish use gear that successfully minimises cod bycatch and introduce additional measures to avoid and minimise cod bycatch in any fisheries using active gears (access to the plaice TAC must be conditional on the use of such gear), considering a full closure of the known spawning areas of Eastern Baltic cod during the spawning period³⁰ in line with the EU Marine Action Plan requirement to ensure strict protection of important fish spawning and nursery areas by 2030.

²⁶ Danish Fishers PO (DFPO), The Fishermen's Association of Bornholm and Christiansø Denmark

²⁷ National Chamber of Fish Producers Poland

²⁸ Sweden Pelagic Federation PO (SPFPO)

²⁹ BalticWaters, Baltic Salmon Rivers Association, CCB, FANC, Fisheries Secretariat, WWF

³⁰ See for example HELCOM, 2019 "Essential fish habitats in the Baltic Sea" Meeting of the continuation of the project for Baltic-wide assessment of coastal fish communities in support of an ecosystem-based management (FISH-PRO III).

The representatives of recreational anglers³¹ recommend preserving the recreational fishing opportunities for cod in 2025. They also recommend alternative management measures which further lower the recreational catch: e.g. increased minimum landing size, a maximum landing size to protect the biggest cod and combine both with seasonal closures and bag limits, targeted management of recreational fishing, intensification of the dialogue between the interest groups, science, and politics. They recommend no dedicated fishing activities on spawning cod, improvement and obligatory use of selective gear to reduce bycatch of cod in commercial fisheries and investigating the impact of cormorant predation on cod stocks.

Some small-scale fisheries representatives³² support the rollover of the 2024 TAC for western cod (340 tonnes), on the condition that the quota is allocated to fishers who use passive gears. They draw attention to the record discard rates which now stands at 55% of catches. They ask for wider management measures for cod, the setting of the plaice quota at a level which minimises cod bycatch, and underline the need for subdivisions 22-24 to be trawl free due to the extreme discard rates and the superior selectivity of the passive gear segment.

Cod SDs 25-32

For 2025, the BSAC recommends a bycatch quota of **595 t** should be maintained, in order to give some opportunities for targeting other species.

The BSAC recognises that the poor status of the eastern Baltic cod has been largely driven by biological changes in the stock during the last decades. Natural mortality has increased and is estimated to be considerably higher than the fishing mortality in recent years. Fishing mortality has a negligible effect on the current low status of the eastern cod stock. The low growth, poor condition, and high natural mortality of cod are related to the changes in the ecosystem.

The BSAC highlights the fact that the directed commercial fishery for eastern Baltic cod has been closed since July 2019. No significant improvement to the state of the stock has been subsequently observed. **The BSAC underlines** the need for additional research on environmental and predator impacts (such as seals, including the parasite load, and cormorants) on the recovery of cod stock.

The fisheries representatives from Finland³³ point to the need to allocate a small bycatch quota for cod (595 tonnes) to ensure the continuity of trawling for herring and sprat. They point out that in the northern Baltic Sea, particularly in the Åland Sea, the situation is different than in the south, and large cod in good condition is caught. It is also important that the scientific cod fisheries in the area continues.

The fisheries representatives from Poland³⁴ do not support the ICES advice for the western cod stock. In their view, the advice does not reflect all factors and changes affecting the stock, such as the population structure and interspecies dependence. In their view, inconsistencies in age interpretation prevent the estimation of fish growth and hamper adequate management advice. This has consequences both for stock assessment and fisheries management.

Some fisheries representatives from Sweden³⁵ highlight that since the implementation of the fishing closures to protect cod spawning in 2021, the cod stocks have not recovered despite a significant reduction in fishing pressure, nor has the measures been evaluated. Moreover, this closure extends to pelagic fisheries as well. However, science is lacking to prove that pelagic fisheries impact cod during their spawning period. They believe this is enough to allow pelagic fishers to fish during the closures.

³¹ European Anglers Alliance (EAA), including Deutscher Angelfischerverband (DAFV),

³² LIFE

³³ Finnish Fishermen's Association, Finnish Fishermen's Association (FFA)

³⁴ National Chamber of Fish Producers

³⁵ Sweden Pelagic Federation PO (SPFPO)

Some small-scale fisheries representatives³⁶ support the rollover of the 2024 TAC for eastern cod (595 tonnes), on the condition that the quota is allocated to fishers who use passive gears, in order to preserve the stock following the first good recruitment since 2016. They draw attention to the high discard rates of eastern cod, over 71% of catches are thrown away in SD 24 from the mixed cod/plaice fishery, and that 34% of the catch is under 35cm or unwanted across the entire distribution range³⁷. They ask for wider management measures for cod. Taking into account the species interactions, one of such additional measures aimed at restoring the cod stocks would be to reduce sprat and herring fisheries in the main cod distribution area.

A group of OIG members³⁸ recommends combining a **zero TAC** with development of a rebuilding plan to ensure rapid recovery above B_{MSY} . They recommend increasing monitoring and control on all vessels using active gears in all areas but prioritised in cod concentration areas, combining both REM and traditional controls, setting the plaice TAC well below the respective single-stock headline advice in order to prioritise cod protection and recovery, ensuring that any vessels fishing for flatfish use gear that successfully minimises cod bycatch and introduce additional measures to avoid and minimise cod bycatch in any fisheries using active gears (Access to the plaice TAC must be conditional on the use of such gear), considering a full closure of the known spawning areas of Eastern Baltic cod during the spawning period³⁹ in line with the EU Marine Action Plan requirement to ensure strict protection of important fish spawning and nursery areas by 2030.

Plaice in SDs 22-32

The BSAC recommends setting the 2025 TAC for plaice in SDs 21-32 in accordance with the ICES MSY approach at **20,079 tonnes**. This TAC is based on the ICES F_{MSY} catch scenario for plaice in SDs 22-32.

The BSAC repeats that given the continued positive development of the plaice stock in SDs 22-23, a realistic quota must be set for this stock, sufficiently high to allow exploitation of this abundant resource.

Some small-scale fisheries representatives⁴⁰ recommend setting the TAC for plaice in SDs 22-32 at **7,106 tonnes** (calculated as $F = F$ in 2024, Kattegat catches deducted) and that the plaice fishery should be conducted only with passive gears to minimise bycatch of cod, reduce discards and implement the landing obligation. They draw attention to the huge mismatch between the advised TAC for plaice and the advised TACs for cod, as both species are caught together. They appeal to the managers to take into account this huge mismatch when setting the TAC for plaice for 2025.

A group of OIG members⁴¹ recommends that protection and recovery of both Baltic cod stocks is prioritised by setting **the plaice TAC well below single-stock headline advice and in no event allowing the fishing level to increase ($\leq 7,106$ t)**⁴². They recommend setting the plaice TAC well below the single-

³⁶ LIFE

³⁷ https://ices-library.figshare.com/articles/report/Baltic_Fisheries_Assessment_Working_Group_WGBFAS_/25764978

³⁸ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, FANC, Fisheries Secretariat, WWF

³⁹ See for example HELCOM, 2019 "Essential fish habitats in the Baltic Sea" Meeting of the continuation of the project for Baltic-wide assessment of coastal fish communities in support of an ecosystem-based management (FISH-PRO III).

⁴⁰ LIFE

⁴¹ BalticWaters, Baltic Salmon Rivers Association, CCB, FANC, Fisheries Secretariat, WWF

⁴² The $F=F_{2024}$ scenario for plaice in SD 24-32 is 798 t (ICES 2024. Plaice (*Pleuronectes platessa*) in subdivisions 24-32 (Baltic Sea, excluding the Sound and Belt Seas). ICES Advice 2024 – ple.27.24-32 – <https://doi.org/10.17895/ices.advice.25019438>, Table 2) and for plaice SD 21-23 it is 8524 t (ICES 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). ICES Advice 2024 – ple.27.21-23 – <https://doi.org/10.17895/ices.advice.25019435>, Table 2). The catch in SD 21 needs to be removed, and based on Table 4 this constitutes a 26% share of the catch in SD 21-23, corresponding to $8524 \text{ t} \times 0.26 = 2216 \text{ t}$. This means the corresponding catch for the $F=F_{2024}$ scenario for plaice in SD 22-32 is $798 \text{ t} + (8524 \text{ t} - 2216 \text{ t}) = 7106 \text{ t}$. This

stock headline advice to safeguard and help recover eastern and western Baltic cod, which are taken as bycatch in the flatfish fisheries. At the very least, the fishing level must not increase, i.e. the plaice TAC must not exceed the $F=F_{2024}$ scenario ($\leq 7,106$ t),⁴³ but in order to minimise the bycatch impact on cod it should be set even lower. ICES should be requested to provide the relevant mixed fisheries considerations. In order to inform the setting of a plaice-TAC going forward that does not jeopardise the recovery of the depleted cod stocks. They recommend considering a spatial closure for vessels operating with bottom towed gear in SDs 22, 24, 25 and 26 where eastern Baltic cod is most abundant to avoid bycatch of the stock, for which a zero TAC is recommended⁴⁴. They also recommend that mandatory REM is installed on all vessels in the targeted flatfish fishery because of the high volumes of cod bycatches. The most selective fishing gears (both existing and new) designed for flatfish must be tested and used to avoid cod bycatch in the flatfish fisheries,^{45,46,47} and access to the plaice TAC must be conditional on the use of such gear. They further recommend considering the high catches of plaice below minimum size in demersal fisheries and the increased discarding due to the decreasing condition of plaice.

Herring SDs 30-31

The BSAC notes that the stock has been declining in biomass for the past 30 years despite the stock being fished below FMSY. This has led to ICES re-evaluating the reference points causing a delay to the advice.

The decrease of SSB in recent years is presumed to be largely a consequence of a change in the food chain, which caused a remarkable decrease in weight at age, deteriorated body condition and even starving and dying especially among the larger herring. Furthermore, the overall decrease in SSB after the peak in 1994 corresponds to an overall increase in fishing mortality during the same period up until 2016. After 2016, while fishing mortality has in general decreased, the SSB has not increased.

In 2023 the Finnish catch decreased by 7% (4,155 tonnes) and the Swedish catch by 34% (5,716 tonnes) compared to 2022.

The BSAC recommends an increased sampling programme so that more and better quality can be gathered.

refers to keeping F for plaice at the same level as in 2024, and must not be exceeded in order not to increase the pressure on cod. In order to decrease the pressure on cod, the plaice TAC would have to be set substantially below his level.

43 ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.21-23.

<https://doi.org/10.17895/ices.advice.25019435>

44 ICES, 2020. Report on eastern Baltic cod bycatch in non-targeted fisheries, mixing with western Baltic cod in SD24, and stock situation in SDs 27-32 (Ad hoc). ICES Scientific Reports. 1:76. 69 pp

45 ICES, 2019. EU request for further information on the distribution and unavoidable bycatches of eastern Baltic cod. In Report of the ICES Advisory Committee, 2019. ICES Advice 2019, sr.2019.24.

46 ICES, 2020. Report on eastern Baltic cod bycatch in non-targeted fisheries, mixing with western Baltic cod in SD24, and stock situation in SDs 27-32 (Ad hoc). ICES Scientific Reports. 1:76. 69 pp.

47 ICES states in the advice for plaice in subdivisions 21-23 that "There are gears available that successfully reduce cod bycatches in the flatfish fisheries; however, these active gears are not currently in use. Reducing the bycatch of cod in flatfish fisheries may enhance the recovery of the cod stocks." (ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.21-23. <https://doi.org/10.17895/ices.advice.25019435>)

Herring SD 28.1 Gulf of Riga

The **BSAC recommends**⁴⁸ that the 2025 TAC for Gulf of Riga herring should be set at **39,233 tonnes**, following the ICES MSY approach (also equal to MAP F_{MSY}). The corresponding TAC in the Gulf of Riga management area for 2025 would be calculated as 39,233 tonnes - 861 tonnes + 3,263 tonnes = **41,635 tonnes**.

A group of **OIG members**⁴⁹ recommend setting the TAC for herring in the Gulf of Riga at **≤ 32,796 t (lower F_{MSY} range 32,796 t – 41,635 t)** in order to build ecosystem resilience by allowing the stock biomass to increase more substantially.

Some small-scale fisheries representatives⁵⁰ recommend setting the TAC for herring in the Gulf of Riga at **32,796 tonnes** (calculated as F_{MSY} lower with central Baltic herring quota transfer).

Herring SDs 25-29, 32, ex GoR

The **BSAC recommends** that the 2025 TAC for herring in the central Baltic management area should be **125,344 tonnes**, which is in accordance with the MAP F_{MSY} scenario in the ICES advice, allowing for an increase in SSB.

The corresponding **EU TAC** in the central Baltic management area for 2025 would be calculated as⁵¹: **125,344 t (EU MAP) - Russian share 9.5% + 861 t – 3263 t) = EU TAC 111,034 tonnes**. The **fisheries representatives**⁵² are of the opinion that the significant reduction of the herring TAC for 2024 had been unwarranted and this overreduction should be compensated to the fishing industry, which is struggling to survive and all efforts to help should be brought into play.

The **fisheries representatives from Finland**⁵³ underlined that the significant reduction of the herring TAC for 2024 had been very difficult for the fishing industry. Strong fluctuations in the advice regarding the TAC levels for pelagic fish species from one year to another are troubling. These fluctuations in the advice are significantly greater than the simultaneous changes in the fish stocks. The fish stock assessments do not reflect the current situation at sea. The state of the herring stock in the northern parts of the TAC area has been found to be significantly better than in the southern parts of this area. The fishing opportunities in the northern parts are greatly affected by the poorer conditions in the southern Baltic Sea. Since the state of the herring stock appears to be improving, the total TAC should reflect this development and be set within the ranges provided in ICES advice, that is between **95,340 and 125,344 tonnes**.

Some fisheries representatives⁵⁴ from Sweden propose setting the 2025 TAC at 95,340 t, in line with the MAP F lower scenario. In this case, the EU TAC would amount to **87,144 t**.

The **fisheries representatives from Poland and Sweden**⁵⁵ propose lifting the additional closure of pelagic fisheries in April. This measure has had drastically negative consequences for the fishing industry. The basis for this closure had been the protection of the central herring stock during spawning, however, according to science, experience and observations at sea, herring aggregates to spawn in the coastal areas rather than in the open sea. They stress the urgency of increasing funding for scientific advice and

⁴⁸ Estonian Fishermen's Association, Latvian Fisheries Association

⁴⁹ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, DAFV, FANC, Fisheries Secretariat, WWF

⁵⁰ LIFE

⁵¹ Deduct 9.5% Russian share. Add 902 t for Gulf of Riga herring to be taken in SD 28.2 and deduct 2,959 t for Central Baltic herring to be taken in the Gulf of Riga (SD 28.1).

⁵² DFPO, Finnish Fishermen's Association, Finnish Fishermen's Association (FFA)

⁵³ Finnish Fishermen's Association, Finnish Fishermen's Association (FFA)

⁵⁴ Sweden Pelagic Federation PO (SPFPO)

⁵⁵ Fish Producers' Organisation Bałtyk Poland, Association of Fishermen of Sea PO Poland, Sweden Pelagic Federation PO (SPFPO)

modelling, to provide certainty and restore confidence in science. They recommend conducting an analysis of the economic impact of different catch scenarios included in the advice on the fishing industry. The results of this analysis should be included in the relevant EU legislation. This will be an opportunity to fully implement the ecosystem approach by taking into account and addressing all impacts, not just fisheries.

Some fisheries representatives from Poland⁵⁶ propose to use a smaller mesh size (16 mm) in herring fishery in the Main Basin, in order to protect the structure of the fish stock in terms of age, size and sex.

Some small-scale fisheries representatives⁵⁷ recommend setting the 2025 EU TAC at **48,442 tonnes**. This is an increase of 20% of the 2024 EU TAC. The stock has improved and is responding well to low F.

A group of OIG members⁵⁸ cannot provide a quantitative catch recommendation due to the degraded state of the stock and high uncertainties, but recommends minimising the fishing pressure. With the F_{MSY} point value scenario in the ICES headline advice the probability of the population staying below $MSY B_{trigger}$ in 2026 is 65%. They point at the sources of uncertainties and reasons for precaution: the dire state of the stocks (below B_{lim} since 2020 and projected to remain around that critical reference point) and the overall state of the Baltic ecosystem, sub-populations and the risk of genetic depletion, misreporting between herring and sprat, misreporting of herring/sprat as non-quota species, such as flounder, Russian share, estimation 27,000 t of catch 2025, ecosystem considerations such as the role of herring in the Baltic Sea ecosystem's food web. They also highlight the need to keep some food availability for the critically endangered Baltic Proper harbour porpoise and other predatory species. They recommend the following actions:

- Develop a rebuilding plan to ensure rapid recovery above B_{MSY} .
- Improve control, enforcement, onboard monitoring and sampling of landings to ensure that the misreporting of sprat as herring and other types of misreporting do not occur.
- TAC reserved exclusively for low-impact coastal fishers catching herring for direct human consumption.

Herring SDs 22-24

The BSAC recommends that the 2025 TAC for herring in SDs 22-24 should be set as a rollover of the 2024 TAC for of **788 t**.

Some fisheries representatives from Sweden⁵⁹ comment that a significant portion of the stock is being fished by recreational fishers, up to 5 times what commercial fishers are allowed to catch. It is important that these catches be recorded and included in the modelling of the stock and if necessary, measures for the recreational fishery should be taken.

Some small-scale fisheries representatives recommend to continue with the derogation for small-scale vessels adopted by the Council in 2023⁶⁰ for herring in SDs 22-24 in 2025.

A group of OIG members⁶¹ recommends a zero TAC for 2025 for this stock. They also recommend developing a rebuilding plan to ensure rapid recovery above B_{MSY} and implementing additional measures to

⁵⁶ National Chamber of Fish Producers Poland

⁵⁷ LIFE

⁵⁸ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, FANC, Fisheries Secretariat, WWF.

⁵⁹ Sweden Pelagic Federation PO (SPFPO)

⁶⁰ By way of derogation from the first paragraph, fishing this quota is permitted for Union fishing vessels of less than 12 meters length overall fishing with gillnets, entangling nets, handlines, pound nets or jigging equipment. Masters of those fishing vessels shall ensure that their fishing activity can be monitored at any time by the control authorities of the competent Member State. [Council Regulation \(EU\) 2023/2638 of 20 November 2023 fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2024 and amending Regulation \(EU\) 2023/194 as regards certain fishing opportunities in other waters \(europa.eu\)](#)

protect and restore known spawning habitats and nursery areas, as indicated in the ICES advice. They call for additional area and/or time restrictions on the herring fishery in the eastern parts of the North Sea divisions 4a, 4b and in division 3a, as catches of Western Baltic Spring herring in the fishery for North Sea herring will be inevitable.

Sprat SDs 22-32

Some fisheries representatives⁶² recommend setting the 2025 EU TAC at 201,000 tonnes, as a rollover of the 2024 TAC.

Some other fisheries representative⁶³ recommend a 2025 TAC (MAP F_{upper}) of 169,131 t. Taking into account the **share of Russia (10.08%)** this would give **EU TAC of 152,083 t.** This TAC is within the range recommended by ICES and would result in a 41% increase of the SSB in 2026. They underline that the sprat TAC should be set as F_{MSY} higher, due to mixed fisheries considerations. The fishing industry is struggling to survive and all efforts to help should be brought into play.

The Finnish fishers⁶⁴ refer to the significant uncertainty regarding young year classes of sprat. According to ICES advice, the recruitment is very low. Observations from fisheries do not support this view. According to the information received, there were plenty of young year-class individuals in the spring catch, indicating that significantly larger year classes were recruiting into the fishery than estimated. Based on this, the proposed sprat TAC reduction (24-42%) may be too large. In addition, a potential reduction in the sprat quota will complicate the herring fishery, and lead to sprat being the limiting factor in herring and sprat fishery.

Some fisheries representatives from Sweden⁶⁵ propose a total TAC in line with the lower range of FMSY EU MAP at 130 195 tonnes. Taking into account the Russian share of 10.08%, this would give EU TAC of 117,072 t. Moreover, they request the removal of the spawning closures periods that result of previous stock situation, simply an action to prevent a zero quota for herring which is not the case now.

Some fisheries representatives from Poland⁶⁶ propose to use a smaller mesh size (16 mm) in sprat fishery in the Main Basin, in order to protect the structure of the fish stock in terms of age, size and sex.

Some small-scale fisheries representatives⁶⁷ recommend a 2025 EU TAC for sprat at the level of 73,566 tonnes. This is calculated as 0.5 F_{MSY} – 10.08% Russian share. They point to the uncertainty in the forecasts in the ICES advice and ask ICES for additional scenarios based on different recruitment values. This sprat TAC together with the proposed TAC for central herring of 48,442 tonnes should avoid a choke situation.

A group of OIG members⁶⁸ recommend setting the EU TAC for sprat well below F_{MSY lower} (≤ 117,071 t), considering that the three most recent year classes (2021 – 2023) are among the lowest in the time series, mixed fisheries considerations of sprat and herring and the well documented misreporting issues⁶⁹. They

⁶¹ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, FANC, Fisheries Secretariat, WWF

⁶² National Chamber of Fish Producers Poland, Fish Producers' Organisation Bałtyk Poland, The association of fisherman and fish processors "Baltijos zvejas" Lithuania, Association of Fishermen of Sea PO Poland

⁶³ Danish Fishers PO (DFPO), Danish Pelagic PO (DPPO), Swedish Fishermen's PO, Finnish Fishermen's Association (FFA), Federation of Finnish Fisheries Associations, Estonian Fishermen's Association, EFFOP

⁶⁴ Finnish Fishermen's Association (FFA), Federation of Finnish Fisheries Associations

⁶⁵ Sweden Pelagic Federation PO (SPFPO)

⁶⁶ National Chamber of Fish Producers Poland

⁶⁷ LIFE

⁶⁸ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, DAFV, FANC, Fisheries Secretariat, WWF

⁶⁹ ICES. 2024. Sprat (*Sprattus sprattus*) in Subdivisions 22-32 (Baltic Sea). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, spr.27.22-32. <https://doi.org/10.17895/ices.advice.25019687>

recommend developing a rebuilding plan to ensure rapid recovery above B_{MSY} . To be able to set a fixed sprat TAC, spatial management and measures to account for species interactions must be put in place (e.g. by spatial or temporal limitations). They recommend increasing control, enforcement, onboard monitoring and sampling of landings to ensure that the widespread misreporting of sprat as herring and of sprat as non-quota species such as flounder and stickleback⁷⁰ does not continue. They underline that the uncertainties regarding the Russian share have further increased, as no information on catches for 2022 and 2023 was officially reported to ICES.

Salmon in SDs 22-31

The BSAC is in consensus on the need to look at an adaptive, ecosystem-based management of the Baltic salmon in all SDs. It repeats its calls to initiate the work on developing a management plan.

Furthermore, **the BSAC agrees** that the reference points used to assess the stock status should not penalise Member States that work on river restoration. Alternative or additional reference points are needed to monitor the stock developments and promote habitat restoration.

The fisheries representatives from Finland⁷¹ and Sweden recommend a **zero** catch from the mixed-stock at-sea fisheries in SDs 22 – 29 and a total catch of **40,000 salmon** in the Gulf of Bothnia and the Åland Sea, in 2025, in accordance with the ICES advice.

The Finnish and Swedish fishers⁷² support the ICES advice of sea fishing to be confined to existing coastal fisheries during the spawning migration (from the beginning of May until the end of August) in the Gulf of Bothnia and the Åland Sea, the total at-sea catch (both commercial and recreational) in these areas being 40 000 salmon in 2025. Although salmon can only be fished in the areas of Finland and Sweden, a significant portion of the total salmon quota is still allocated to southern member states. The size of Finland's annual salmon quota currently depends on the quotas transferred from the southern Baltic states, which cannot be utilised by them. They do not consider this a sustainable long-term solution.

The Swedish fishers⁷³ welcome allowing salmon fishery again in SD30, as many coastal fishers depend on salmon fisheries.

Some small-scale fisheries representatives⁷⁴ recommend to reopen the limited coastal fishery in SD 29 and 30.

The representatives of recreational anglers⁷⁵ recommend the following regulations and actions concerning Baltic salmon for 2025:

- A bag limit of one salmon (excluding recent spawners) per angler and day for sea anglers south of latitude 59.30 N.
- Recreational trolling north of 59.30 N should be subject to member state regulation and not be unnecessarily regulated by a 4 nautical mile boundary.
- Regulations demanding landing of whole un-filleted fish should only be for salmonids (salmon and sea trout), not for other species such as pike, perch and pikeperch.
- Utilise more EMFAF funding for the removal of fish migration barriers in the rivers.
- An ecosystem-based and adaptive management plan for salmon must be adopted.

⁷⁰ Source Swedish Verification Report from DG-MARE 30/06/2023.

⁷¹ Federation of Finnish Fisheries Associations, Finnish Fishermen's Association (FFA), Swedish Fishermen's PO

⁷² Finnish Fishermen's Association (FFA), Federation of Finnish Fisheries Associations, Swedish Fishermen's PO

⁷³ Swedish Fishermen's PO

⁷⁴ LIFE

⁷⁵ EAA, DAFV

A Europe-wide program should be initiated to achieve a balanced European management of cormorants.⁷⁶

A group of OIG members⁷⁷ postpones their recommendation until September 2024, once the information on the spawning population collected over the summer is available. The forecast for returning spawners for this year is not looking positive, if this trend continues over the summer no commercial fishing should be allowed. The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

Salmon in SD 32

The BSAC recommends that the 2025 TAC for salmon in SD 32 should be no more than **9,440 salmon**. This would correspond to reported commercial landings of **8,118 salmon**⁷⁸.

In addition, **a group of OIG members**⁷⁹ proposes the following:

- No wild salmon should be targeted in the Gulf of Finland (GoF). Salmon in the GoF can be targeted only by fishing gear that is proven to do no harm to released wild salmon bycatch.
- Salmon from GoF mix with Main Basin salmon stocks at sea. The mixed stock sea fishery must be stopped to safeguard the GoF stocks.
- The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

⁷⁶ EAA, DAFV

⁷⁷ BalticWaters, Baltic Salmon Rivers Association, CCB, EAA, FANC, Fisheries Secretariat, WWF

⁷⁸ Federation of Finnish Fisheries Associations, Finnish Fishermen's Association (FFA), Swedish Fishermen's PO

⁷⁹ BalticWaters, Baltic Salmon Rivers Association, CCB, FANC, Fisheries Secretariat, WWF