

HELCOM FISH Group

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Ref: BSAC/2024-2025/22

Copenhagen, Thursday 17th October 2024

Subject: BSAC input to HELCOM Recommendation 32-33/1 focusing specifically on salmon

Dear HELCOM FISH group,

The original HELCOM recommendations on salmon and sea trout ¹are being revised, with Recommendation 32-33/1 focusing specifically on salmon. Another HELCOM Recommendation will focus on sea trout and will be drafted at a later stage.

The Baltic Sea Advisory Council (BSAC) welcomes the HELCOM review of its recommendations on Baltic Salmon conservation and would like to contribute to this work with the presented input.

The BSAC members have carefully considered the HELCOM draft submitted to the HELCOM Expert Group on Migratory Fish² on the 23rd and 24th September and formulated the following comments:

- The overall objectives look adequate. The BSAC flags that a special attention should be given to how the monitoring of objective 1 - *Maintain and restore Baltic salmon populations to levels that ensure long-term sustainability by achieve river specific targets* - is carried. In particular, it will be important to not only focus on the smolt production but also monitor the number of spawners returning to the rivers.

Under the action topic *Apply best practice in rearing and releasing*, The BSAC is in agreement with HELCOM on the long-term aim to phase out compensatory releases. The BSAC recommends that HELCOM recognises within the recommendation that a phase out should occur only when a wild river stock has been re-established within the river in which compensatory salmon are currently released. HELCOM should also recognise that a re-established wild population may not

¹ <https://helcom.fi/wp-content/uploads/2019/06/Rec-19-2.pdf>, <https://helcom.fi/wp-content/uploads/2019/06/Rec-32-33-1.pdf>

² https://www.bsac.dk/wp-content/uploads/2024/06/4-1-Draft-revised-HELCOM-Recommendation-on-salmon_clean.pdf

achieve the same population strength as a river in its previous natural wild state or in parity with previous levels of compensatory releases. The BSAC state that compensation for loss will still be an issue, and fisheries rights owners, recreational and commercial fishers must be compensated for such loss caused by hydro-electric utility owners.

Furthermore, under the same action topic, the BSAC recommends specifically including the text, “including monitoring and reporting the number and percentage of fin-clipped salmon ascending fish passages in salmon rivers.

- Under the action topic *Manage coastal and riverine fisheries*, the HELCOM draft considers series of management measures³ that seem much too precise and should rather be developed on a smaller regional and local scale (for example at river level), depending on the local needs and population status. This would be in accordance with HELCOMs own goal of “*developing fishing rules for management of river fisheries through a participatory and open process that includes local stakeholders*”.

Among a range of measures, HELCOM actions include that “where needed a total fishing ban on salmon should be applied in coastal and riverine fisheries”. To totally close all angling opportunities within rivers has a negative effect upon local engagement in fisheries management and control. A total ban on fishing could therefore be negative for a river stock. BSAC recommends that where needed the harvesting of salmon should be banned but that angling in the river may be allowed to continue.

- Under the action topic *Manage marine fisheries*, the BSAC recalls the role of the CFP and BALTFISH Joint Recommendations (including BSAC stakeholders input to draft joint recommendations) when it comes to marine fisheries management.

The BSAC also highlights that data collection for salmon in marine areas is missing and research should be working on filling in this gap. The tools for understanding better what happens at sea are available but they are costly. To achieve this, HELCOM Contracting Parties could foster private investment from energy companies which infrastructures interact with salmon stocks upstream (dams) and downstream at sea (offshore windfarms).

- Under the action topic *Manage environmental pressures and threats in a coherent policy framework for permitting/planning*, the BSAC highlight the need to focus research, gather data, and incorporate in scientific assessment on the different components affecting natural mortality of salmon. This should include climate change effects, predators pressure, etc.

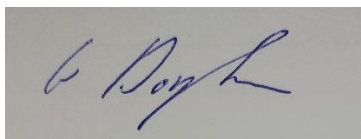
³ For instance, the measures on barbed hooks restrictions, number

- The BSAC additionally remarks that HELCOM might want to include provisions on educational needs for recreational fishers and other stakeholders. In particular, the importance of genetic diversity of the salmon populations seems to be underestimated by some stakeholders and should be promoted.
- The BSAC recommends that the management of marine fisheries under the CFP and any future Baltic salmon management plan is coherent with the objectives to protect and rebuild weak Baltic salmon populations, as well as with management of coastal and riverine fisheries.

The BSAC members wanted to thank the HELCOM secretariat for its availability to present the huge work undertaken in HELCOM with the contracting parties and the good cooperation.

The BSAC remains available to continue to contribute to the review of the HELCOM recommendations and thank you for your consideration of this letter.

Yours sincerely,



Glenn Douglas
Interim EBM CHAIR



Jarek Zielinski
Executive Committee Chair