

Copenhagen 7th July 2017

Corrected 30th August 2017 (see under eastern Baltic cod OIG position, in yellow)

BSAC recommendations for the fishery in the Baltic Sea in 2018

The BSAC recommends setting the catch levels for the Baltic stocks in 2018 at the values indicated in the table below. For all stocks, the recommendations are formulated and agreed after consideration of the biological advice, as presented by Eskild Kirkegaard, ICES ACOM Chair, to the Joint WG of the Baltic Sea Advisory Council on 7th and 8th June 2017¹ and further discussion at the BSAC Executive Committee meeting on 29th June 2017.

At the Joint WG meeting, the Working Group took note of the way in which ICES had interpreted the Multiannual Plan for the Baltic (MAP) and had incorporated it into the advice for 2017, as well as the values in the ranges in Annexes I and II of the MAP².

Based on the discussions in the Working Group, the BSAC would like to repeat that there is a need to establish a procedure for changing the reference points in the Annexes I and II as new data becomes available. The provisions in Article 4 (6), whereby the Commission may submit a proposal for the revision of the conservation reference points, is not considered sufficient.

The BSAC is aware that the assessments from ICES offer the best available picture of the development in stocks, and the advice provides ranges in line with agreed management plans and/or requests for advice from contracting parties. It does not take into account socio-economic considerations. Therefore, socio-economic aspects need to be considered by managers in the decisions they take. The members of the BSAC are concerned that for some stocks, the advice contains drastic changes in the assessment of spawning stock biomass (SSB) from year to year and does not always reflect the actual stock development. Therefore, the advice cannot always be translated immediately into practical fisheries management. They express the view that a more sensible approach to fisheries management should be reflected by the advice, e.g. in recommending a long-term, step by step approach in the case of changes to the fishing mortality.

¹ <http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Joint-Working-Group>

² http://www.bsac.dk/getattachment/BSAC-Resources/Documents-section/European-Parliament-and-Council/MAMPBaltic2016_1139http___eur-lex-europa.pdf.aspx?lang=en-GB

The OIG³ organisations recommend following the ICES 2017 advice for the Baltic, as well as adhering to the provisions in the Basic Regulation and the Multiannual Plan for the Baltic.

For several stocks, the latest assessment from ICES has shown remarkable changes compared to the assessment of the previous year. This is particularly the case for Western Baltic cod, plaice in Sub-divisions 21-23 and herring in Sub-divisions 22-24. The BSAC is concerned about the consequences that these radical changes have on management if a pragmatic way of translating new knowledge to practical management is not accepted. It is not acceptable that a responsible decision, taken on a sound scientific basis in a particular year, suddenly becomes irresponsible because ICES has acquired new knowledge. It is also unfair to demand that the industry adapts to a fast-moving target from year to year.

Proposals from the BSAC on how to implement this pragmatic approach are dealt with under the explanations for each of the stocks concerned.

³ WWF, Oceana, The Fisheries Secretariat, Coalition Clean Baltic, European Anglers Alliance, Finnish Association for Nature Conservation
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	TAC for 2017 Tonnes (except salmon)	BSAC recommendation for 2018	Minority position for 2018
Cod 22-24	5.597	8.597	1.376 ⁴
Cod 25-32	30.857	30.857	24.767 ⁵
Herring 22-24	28.401	24.141	17.309 ⁶
Herring 25-29, 32, ex GoR	191.129	263.665	238.229 ⁷
Herring Gulf of Riga	31.074	30.687	28.999 ⁸
Herring 30-31	140.998	103.591	95.566 ⁹
Sprat 22-32	260.993	Rollover (260.993)	262.310 ¹⁰

⁴ WWF, Oceana, The Fisheries Secretariat, Coalition Clean Baltic, European Anglers Alliance, Finnish Association for Nature Conservation, Latvian Fisheries Association.

⁵ WWF, Oceana, The Fisheries Secretariat, Coalition Clean Baltic, European Anglers Alliance, Finnish Association for Nature Conservation.

⁶ idem

⁷ idem

⁸ idem

⁹ idem

¹⁰ idem

Plaice 24-32	7.862	7.862	6.272 ¹¹
Salmon 22-31	95.928 individuals	95.928 individuals	79.585 individuals ¹²
Salmon 32	10.485 individuals	10.485 individuals	8.669 individuals ¹³

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

¹¹ idem

¹² idem

¹³ idem

Cod SDs 22-24

The BSAC recommends setting the 2018 TAC for cod in Sub-divisions 22-24 to 8.597 tonnes.

A fishing mortality in line with F_{msy} will correspond to a total catch of 7.154 tonnes of Western cod. With an expected German recreational catch of 1.754 tonnes, this would leave 5.400 tonnes to be caught by the commercial fleets. It is assumed that 31% of this catch will be taken in Sub-division 24 where on average 2.3 cod of Eastern origin are caught for each cod of Western origin.

Setting the 2018 TAC for Western cod according to F_{msy} would result in an expected catch of 9.752 tonnes.

This would correspond to a reduction in fishing mortality of 30% (from 0.37 to 0.26) and would result in a spawning stock biomass in 2019 of 46.848 tonnes – comfortably above $MSY B_{trigger}$. The expected catch of Western cod in 2019 could then be set at approximately 15.000 tonnes. With a recreational catch of 2.000 tonnes, this would mean that the TAC for 2019 would be composed of 13.000 tonnes of Western cod, not including any element of Eastern origin.

If the TAC is set in line with the interpretation by ICES of the management plan, it would be 6.066 tonnes in 2018 and 14.000 tonnes (deducting 2.000 tonnes for recreational catches and still excluding the Eastern component) in 2019.

The problem of how to deal with the cod of Eastern origin is complex and it becomes even more so as the size of the Western cod stock increases. ICES has proposed to put a cap on the amount of cod that is transferred from East to West in order to prevent an imbalance caused by the massive growth in the Western stock. This cap is set at 15% of the advised catch in the East. With the present condition of the Eastern cod stock, this would mean that a maximum of approximately 4.000 tonnes can be included in the Western TAC.

Without going further into the details about the Eastern component, the BSAC concludes that the TAC for the Western area can either be increased by 500 tonnes in 2018 and then by 8.000 tonnes (+East) in 2019, or it can be increased by 4.000 tonnes in 2018 and then by another 4.000 tonnes (+East) in 2019. In the first case, the TAC will increase by at least 8.500 tonnes over the next two years. In the second case, it will increase by at least 8.000 tonnes.

These observations, combined with a general scepticism towards the validity of the revision by ICES of the SSB, and the aforementioned need to apply some pragmatism to the latest available numbers, lead the BSAC to advise a “middle road” in setting the TAC for Western cod in 2018 (and 2019).

The middle road would be to increase the TAC for Subdivisions 22-24 by 3.000 tonnes to 8.597 tonnes in 2018 and then to set the TAC for 2019 on the basis of MSY , if the stock has increased to more than $MSY B_{trigger}$. A TAC of this size is likely to correspond to a commercial catch of 5.000 tonnes of Western cod, corresponding to a fishing mortality of 0.24 and resulting in a spawning stock biomass in 2019 of more than 47.469 tonnes, even if the downward revision by ICES holds true.

As the cod stock will be above B_{lim} in 2018, and the TAC is set at a level that will increase it to above $MSY B_{trigger}$ during the management year, there is no need for extraordinary measures, and the closure of the cod fishery in Sub-divisions 22-24 during February and March should be abolished.

The minority group¹⁴ is in favour of setting the TAC in line with the ICES advice corresponding to the MAP with F_{lower} giving a commercial catch of 1.376 tonnes (total catch of 3.130 tonnes). They do not support a quota transfer from the Eastern Baltic cod TAC to the Western Baltic cod TAC.

Another OIG organisation¹⁵ is flexible with respect to the TAC advised by ICES. The priority is to ensure that all catches count against the TAC and that full accountability would enable free choice of gear.

A small-scale fisheries organisation¹⁶ is of the opinion that the calculation leading to the TAC of 8.597 tonnes is too theoretical and far away from the ICES advice. Therefore, it is in favour of setting the TAC at 6.066 tonnes and does not agree to abolishing the extended spawning closure.

Cod SDs 25-32

The BSAC recommends setting the 2018 TAC for cod as a rollover of the 2017 TAC at 30.857 tonnes.

The advice from ICES is based on the precautionary approach, which implies that ICES cannot estimate the actual size of the stock. The advice given is therefore given in relative terms. According to the internal rules of ICES, this advice is calculated as a percentage of the advice given in the previous year. In effect, this means that the advice for the cod fishery in the Eastern Baltic for 2018 is a 3% reduction of an 8% reduction (advice for 2017) on a 20 % reduction (advice for 2016) of an assumed level of catches from 2014.

The surveys that provide the data for the ICES index of abundance do not cover cod in Sub-division 24. Even if it may be claimed that the stock component in Sub-division 24 is likely to exhibit the same trends in development as the cod in the main distribution area, it is also widely recognised that cod in Sub-division 24 are in a better condition and are less vulnerable to seal predation than cod further east. It is not clear how these cod have been included in the sequence of advised reductions over the years since 2014, when ICES first realised that their assessments were not on target.

This again implies that the figure offered as a proposed management measure for the Eastern cod stock cannot be regarded as a proxy for the biomass. Therefore, it makes little sense to deduct cod from this proposed catch level.

¹⁴ WWF, Oceana, The Fisheries Secretariat, Coalition Clean Baltic, European Anglers Alliance, Finnish Association for Nature Conservation, Latvian Fisheries Association

¹⁵ Baltic Sea 2020

¹⁶ Association of Fisheries Protection

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Moreover, the BSAC finds it excessive to adapt an already questionable TAC with such a minor correction as 3%. The precision of the assessment and the applied methods are not accurate enough to warrant such minute adaptations.

As a result, the BSAC recommends setting the EU TAC for cod in Sub-divisions 25-32 as a rollover of the TAC for 2017.

The minority¹⁷ position is to follow the ICES advice, which corresponds to an EU quota of **24.767 tonnes**. (total Baltic TAC of 26.071 tonnes, minus the 5% Russian share).

Herring SDs 22-24

The BSAC recommends that the 2018 TAC for herring in this management area should be 24.141 tonnes.

This is one of the stocks where the assessment by ICES shows a significant change compared to that of last year. Regardless of whether the latest advice is more precise than the previous advice, it is obvious that the fishing industry cannot adapt to a change of such magnitude over just one year.

As a result, the BSAC advises to reduce the TAC for herring in Sub-divisions 22-24 by 15% until an upcoming benchmark by ICES can verify the latest results. If these results are still valid, the TAC should be reduced by 20% annually until the target mortality is reached.

This would imply that the TAC for herring in Sub-divisions 22-24 is set at 24.141 tonnes.

The minority¹⁸ supports the ICES advice of no more than 17.309 tonnes.

Herring SDs 25-29, 32, ex GoR

The BSAC recommends that the 2018 TAC for herring in the central Baltic management area should be 263.665 tonnes (EU share + Russian quota), which is a 24% increase in the advised catch, corresponding to the EU management plan.

The minority¹⁹ position is to follow the Baltic Sea multiannual plan (MAP) provisions and the ICES advice based on the Baltic Sea MAP. The TAC for herring in subdivisions 25-29, 32 should not exceed 238.229 tonnes (which is consistent with MAP F_{MSY} point value). Calculation pattern: SDs25-29, 32 herring TAC = (advised catch minus 9.5% Russian share), plus catch of Gulf of Riga herring taken in central Baltic, minus catch of herring from central Baltic stock taken in Gulf of Riga.

¹⁷ WWF, Oceana, The Fisheries Secretariat, Coalition Clean Baltic, European Anglers Alliance, Finnish Association for Nature Conservation

¹⁸ idem

¹⁹ idem

Herring SD 28.1 Gulf of Riga

The **BSAC** recommends that the 2018 TAC for herring in this management area should be 30.687 tonnes.

The minority²⁰ position is to follow the F_{msy} advice option, which corresponds to a fishing mortality of 0.32 and a TAC of 28.999 tonnes.

Herring SDs 30-31

The **BSAC** recommends following the precautionary approach, so that the 2018 TAC for herring in this management area should be set at 103.591 tonnes.

In justification of the recommended TAC of 103.591 tonnes, the BSAC highlights the uncertainties in the advice, which result in big changes. This makes a moderate reduction in the TAC for 2018 acceptable and, by allowing the fishermen to transfer unused quota from 2017 to 2018, it will not mean a big change in the reality for the fishermen.

The minority²¹ position is to follow the MSY approach with F_{msy} , which corresponds to a TAC of 95.566 tonnes.

Sprat SDs 22-32

The **BSAC** recommends setting the total 2018 EU quota for sprat as a rollover from 2017 (260.993 tonnes) Sprat is often caught together with herring. For this reason and based on the fact that the spawning stock of sprat is well above MSY $B_{trigger}$, the fishing mortalities from column B in the management plan should be applied. According to ICES, this would translate into a reduction of 0.7%, which is too small to make a difference to the stock (more sprat disappeared between the two assessments of 2016 and 2017).

Moreover, members of the BSAC highlight the information provided on species interactions between sprat and salmon and the potential negative impact of the large sprat biomass on the salmon stock (M74); as well as the potential negative impact on the cod. They see no reason for trying to maintain the sprat stock at levels 2.5 times higher than MSY $B_{trigger}$, when such negative consequences are described. They would therefore agree to set the quota even higher than stipulated by the plan, if this would be possible with reference to environmental impacts.

The BSAC is not in favour of introducing spatial management of the sprat fishery. The previous poor condition of cod that initiated this discussion has been reversed and there appear to be no good arguments for preventing the fleets from fishing sprat where they find the conditions optimal in relation to fuel consumption, catch rates and safety of the vessels.

²⁰ idem

²¹ idem

The minority²² proposes to follow the Management Plan with F at F_{msy} , which corresponds to a TAC of 262.310 tonnes and it supports spatial management to restrict sprat fishery in SDs 25+26.

A small-scale fisheries organisation²³ also calls for spatial management of the sprat fishery.

Plaice SDs 22-32

The BSAC recommends setting the 2018 TAC for plaice as a rollover at 7.862 tonnes, in view of the fact that the stock size and recruitment have been increasing significantly since 2002 for the stock component that accounts for the main part of the landings. ICES also describes this stock as being in good condition, albeit at a perceived lower level than was thought last year.

The minority²⁴ is in favour of following the precautionary approach recommended in the ICES advice, which corresponds to a TAC of 6.272 tonnes.

Salmon SDs 22-31

In accordance with the ICES advice, the BSAC recommends setting the TAC for salmon in Sub-divisions 22-31, using the F_{msy} approach, as a rollover of the 2017 TAC at 95.928 individuals. This is perceived as a sustainable catch, based on the biological assessment of the catch that the stock can sustain.

Moreover, the representatives of the BSAC cannot accept the limitation of the commercial catches because of the illegal unreported catches, discards and the allocation to the recreational fisheries.

The Danish Fishermen Producer Organisation recommends setting the TAC in line with the scientific advice at 116.000 individuals.

The minority²⁵ position is that the amounts of misreported, unreported, and unwanted catch must be deducted from the total commercial catch to determine the EU TAC and recommend an EU TAC of no more than 79.600 individuals.

²² idem

²³ Association of Fisheries Protection

²⁴ WWF, Oceana, The Fisheries Secretariat, Coalition Clean Baltic, European Anglers Alliance, Finnish Association for Nature Conservation

²⁵ idem

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Salmon SD 32

The BSAC recommends that the 2018 TAC for salmon in SD32 as a rollover of 10.485 individuals.

The Finnish sector recommends a rollover because the current TAC reflects well the pattern of the fishery.

The Estonian Fishermen's Association supports the rollover of the TAC, which results in 10.485 individuals. It points out that Estonia acknowledges that wild salmon stocks in the Gulf of Finland exist in three Estonian rivers and Estonia will therefore be highly committed to measures necessary for the conservation of the wild salmon stocks in the Gulf of Finland. In particular, Estonia will continue its strict and targeted management measures in the coastal waters, as well as salmon rivers and their outlets, e.g., construction and maintenance of fish passages, habitat restoration, restocking activities and protection measures to support wild salmon stocks through its migratory paths, as recommended by ICES. There has been a positive trend in parr densities and smolt production during the last few decades, as well as demonstration of a workable and balanced composition of technical measures to protect salmon stocks in Estonia.

The minority²⁶ position is that after deducting the figures for the unwanted and unreported catches, as well as the Russian share, it would give a TAC of 8.700 individuals. It adds that no targeted fishing for wild salmon is permitted in the Gulf of Finland.

²⁶ idem