



Open Letter to the Danish Fisheries Minister: Leading the Way Toward Precautionary Baltic Sea Fisheries

Dear Minister Jacob Jensen,

As Denmark assumes the EU Council Presidency and prepares to lead the October Agrifish negotiations on Baltic Sea fishing opportunities for 2026, you have a unique opportunity to steer the Council toward precautionary, ecosystem-based fisheries management that secures the long-term health of the Baltic Sea and its fish populations.

The Baltic Sea is in crisis

The scientific evidence¹ is clear: the Baltic Sea ecosystem is in severe distress. Once productive fish populations such as eastern and western Baltic cod and western Baltic herring remain critically depleted, with the International Council for the Exploration of the Sea (ICES) again advising zero catch. Even with the drastic catch restrictions in recent years, these populations show no signs of recovery. Of the four Baltic herring populations, only the Gulf of Riga stock remains healthy. The Baltic sprat has suffered very low recruitment from 2021–2023, and signs of improvement rely on a single survey—making the forecast highly uncertain.

The poor condition (such as weight-at-age) of flatfish, such as plaice, also raises alarm bells. The salmon spawning migration has fallen short of the target level in the past two years. As a result, even the healthiest salmon stocks are now unlikely to produce enough smolts corresponding to sustainable levels in the coming years. Finally, European eel remains “Critically Endangered” on the HELCOM Red List and shows no sign of recovery, with Baltic catches largely dependent on restocking.

¹ See for instance the HELCOM HOLAS assessment (HELCOM (2023): State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194

Forage fish need extra precautionary measures

A recent [report](#) by FishSec² shows that forage fish such as sprat and herring are the backbone of the Baltic Sea food web. They provide vital prey for cod, salmon, seabirds and marine mammals and serve as a bridge for energy transfer between plankton and top predators. Their management must therefore be especially precautionary and grounded in an ecosystem-based approach, aiming to rapidly restore populations, increase ecological resilience and support the long-term sustainability of fisheries and coastal communities around the Baltic Sea.

Set fishing limits well below scientific advice to rebuild fish populations

The Common Fisheries Policy requires that fishing opportunities are set according to the precautionary and ecosystem-based approach³. Yet, the current advice is not designed to rebuild stocks within any concrete timeframe, let alone in the near future, nor to prevent unsustainable stock declines⁴. Continuing to fish vulnerable and declining fish populations is fundamentally unsustainable — both for the fishing sector that depends on healthy stocks and for the wider marine ecosystem. Fishing these populations even at, or slightly above, the Maximum Sustainable Yield (MSY), based on the single-stock headline advice provided by ICES, may jeopardise or delay their recovery and fails to prevent them from falling outside safe biological limits.

A recent study in the journal *Science*⁵ shows that fisheries management projections have been overly optimistic and that there is substantial uncertainty in modeled stock estimates, particularly for already overfished stocks.

A more holistic, ecosystem-based approach to fisheries management, in line with legal requirements, is needed to change the downward trend in Baltic fish populations.

Support the Commission's precautionary proposal

We therefore welcome the European Commission's proposal for Baltic fishing opportunities for 2026, which maintains central Baltic herring and sprat catches unchanged, significantly reduces Bothnian herring fishing, and fully respects the legal biological safeguards in Article 4.6 of the Baltic Multiannual Plan.

² Birgersson, L., Pedersen Schirmer, C (2025). [Small fish with a big impact – a review of forage fish importance for a healthy Baltic Sea. FishSec \(Fiskesekretariatet\). Stockholm, Sweden.](#)

³ Article 2.2 and Article 2.3 of the CFP Regulation (EU) no 1380/2013

⁴ Read more here: Joint stakeholder briefing [“Best available” is not good enough - addressing shortcomings in the current scientific advice](#)

⁵ Edgar, G. J., Bates, A. E., Krueck, N. C., Baker, S. C., Stuart-Smith, R. D., & Brown, C. J. (2024). [Stock assessment models overstate sustainability of the world's fisheries. Science, 385\(6711\), 860-865.](#)

We call on you to ensure that, under yours and Denmark's leadership, the Council:

- **Adopts 2026 Total Allowable Catches (TACs) for sprat and all four herring stocks at or below the Commission's precautionary proposal**; respecting both the precautionary and ecosystem-based approaches mandated by EU law;
- **Applies extra caution to forage fish**, such as herring and sprat, recognising their critical role in sustaining the Baltic food web;
- **Prioritises long-term ecosystem recovery** and the resilience of fishing communities over short-term economic pressures.

Denmark now has the opportunity to demonstrate that EU fisheries management can be based on precautionary principles. The decisions made under your Presidency will determine whether the Baltic Sea continues on its path towards ecosystem collapse or - with these pivotal actions - begins the necessary journey of recovery of Baltic fish populations.

Yours sincerely,

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