

**Annex: Comments and recommendations for Member States on the
Commission proposal for a *Council Regulation fixing for 2017 the fishing
opportunities for certain fish stocks and groups of fish stocks applicable in
the Baltic Sea***

COM (2016) 545

29 September 2016

We welcome the Commission proposal which is largely in line with both scientific advice and international and EU commitments to sustainable management of fisheries resources.

We provide our recommendations to the Council for the setting of fishing opportunities in 2017 based on the latest advice from the International Council for the Exploration of the Sea (ICES).¹

Total catch, total commercial catch and Total Allowable Catch (TAC)

Readers of ICES advice must understand that “total catch” and “total commercial catch” are not always synonymous with Total Allowable Catch (TAC).

ICES advises the total commercial catch for a stock whenever possible. Total catch represents the total fishing mortality for a stock from all stakeholders and across the stock’s full range, possibly across multiple management areas. Total commercial catch is fishing mortality only from commercial fishing.

For fisheries under the landing obligation, the corresponding TAC (or EU quota, if the TAC reflects third country catches) represents total commercial catch. For fisheries not yet under the landing obligation, the corresponding TAC represents only commercial landings. As of 1 January 2017, all catches of plaice in the Baltic will fall under the landing obligation in addition to herring, sprat, salmon, and cod.²

Differences between ICES total catch and regulatory TAC or quota

	Total catch	Total Allowable Catch (TAC), or quota
Framework	Scientific	Management, informed by science
Constraint	Stock range	Management area
Stakeholder	All	Commercial
Fishing Mortality	Total	Dependent on landing obligation

ICES may highlight distribution issues related to stock mixing, interspecies relationships, or management area mismatches, but holds no preference for any distribution method excepting those which could exceed the advised total catch. For example, stock mixing between the Baltic cod stocks in subdivision (SD) 24. Readers must examine ICES advice

¹ Full ICES advice is available at <http://www.ices.dk/publications/library/Pages/default.aspx>

² Commission Delegated Regulation (EU) 1396/2014

closely and be familiar with the management of a relevant stock to determine what portion of the advised total catch represents the advised TAC.

Map of the Baltic Sea showing management subdivisions³



³ FAO. 2016. [FAO major fishing areas] <http://www.fao.org/fishery/area/Area27/en>

Table showing ICES advice for 2017 including the total commercial catch in tonnes, percentage difference from advice for 2016, and the 2017 EU quota corresponding to ICES advice

Stock by management area, subdivision	Advised total commercial catch (t) for 2017, across the stock's full range & including third country catch	% Change from ICES advice for 2016	2017 recommendations, adjusted for management areas and reduced by third country quotas
Cod, Western Baltic, 22-24	917 (3 475)*	-55%*	917
Cod, Eastern Baltic, 25-32	26 994	-8%	25 644 [^]
Herring, Western Baltic Spring Spawners, 20-24	56 802	8%	28 401 ^{**}
Herring, Central Baltic, 25-29 & 32	216 000	7%	191 129 ^{***^}
Herring, Gulf of Riga, 28.1	23 078	-12%	27 429 ^{***}
Herring, Bothnian Sea, 30	134 556	39%	140 998 ^{^^}
Herring, Bothnian Bay, 31	6 442	-3%	
Sprat, Baltic, 22-32	314 000	53%	282 349 [^]
Plaice, Kattegat, Belts & Sound, 21-23	8 333	-4%	7 862 ⁺
Plaice, Baltic, 24-32	2 587	20%	
Salmon, Baltic, 22-31 (<i>count of fish</i>)	116 000	0%	89 320 ⁺⁺
Salmon, Gulf of Finland, 32 (<i>count of reared fish</i>)	11 800	0%	9 403 ⁺⁺

* Brackets include total catch (commercial + recreational), and advice comparison is with this #

** Reflects TAC splitting procedure in negotiated agreement for Baltic catch (SD 22-24)

*** Adjusted for the relative quota shares of each stock caught in the adjacent management area

[^] Based on prior EU-Russia TAC sharing agreement

^{^^} Bothnian Bay & Bothnian Sea herring are managed under one TAC

⁺ Estimated plaice catch in the Kattegat (SD 21) is deducted to determine the Baltic area quota

⁺⁺ After removing unreported, misreported, and discarded catch

Detailed Summary of Recommendations for Baltic Fishing Opportunities

COD

Since 2004, the Baltic Sea cod (*Gadus morhua*) has been managed as two separate stocks, Eastern and the Western, with advice provided per fishing zone regardless of stock mixing. Although biologically distinct, significant mixing of the Eastern and Western stocks in SD 24 has challenged ICES to refine their advice. Based on the 2015 cod benchmarking exercise, ICES advice is more thorough concerning the stock in SD 24.

However the Council allocates fishing opportunities between Eastern and Western Baltic cod, any increase in TAC could potentially result in a further increase of both landings and discards. This is due to the current lack of effective monitoring and limited proof of compliance with the landing obligation. Action is urgently required to curb unreported discarding and improve selectivity in the fisheries already under the landing obligation, particularly in the fisheries for Baltic cod.

Cod in Subdivisions 22–24, Western Baltic

Western Baltic cod is severely overfished. The SSB peaked in the early 1980s and reached a record low in 2013. Overall fishing mortality is, and has consistently been, well above F_{MSY} . The most recent stock assessment revised the historic SSB downward and the fishing mortality rate upward. This stock has not grown as expected in the previous assessment, and the SSB has remained below B_{lim} , outside of safe biological limits and near collapse, for nearly a decade. In addition, recruitment to the fishable stock in 2016 is the lowest in the 1994-present time series. This apparent recruitment failure is further crippling this extremely overfished stock.

Note that the assessments for this stock have historically been overly optimistic, with regular downward revisions of biomass and upward revisions of fishing mortality. It is thus likely that any anticipated stock growth is also overly optimistic.

The total commercial catch advice for western Baltic cod is 917 tonnes. This catch is a portion of the total catch represented in ICES advice, which is 3 475 tonnes. To arrive at the total commercial catch advice, ICES deducted 2 558 tonnes of assessed recreational catch.

The new Baltic Multiannual Plan stipulates what should be done under current situations as regarding the Western Baltic cod stock, and measures include closing a fishery to quickly rebuild the stock, as reiterated in the Updated Commission proposal 2016/0260 NLE. Reproduction is now clearly impaired and the biomass is below the critical limit value. The plan calls for stringent use of Article 5 safeguards and demands that fishing is reduced in line with the scientific advice and recital 13, both resulting in a TAC of 917 tonnes.

While we appreciate the Commission's proposal to balance fishery removals by reallocating 671 tonnes of the eastern Baltic cod stock to SD 24, we cannot support this proposal unless explicitly accompanied by a sub-TAC to ensure the remaining western stock in SDs 22-23 are protected from overfishing.

One of the primary objectives of the CFP is to "promote coastal fishing activities, taking into account socio-economic aspects" (CFP article 2.5.i). Due to the impact of continuing quota reductions, and the larger burden this places on the more vulnerable small-scale coastal fishery, many "Other Interest Group" members in BSAC and joint Baltic Action Plan from the Low Impact Fishers of Europe urge Member States to consider Article 17 of the CFP, in

particular the concluding line to prioritize fishing opportunities for “...fishing vessels deploying selective fishing gear or using fishing techniques with reduced environmental impact...”. The Commission’s proposal also highlights that under Articles 16 and 17 “Member States have ample room for[sic] manoeuvre on decision related to the social/economic model of their choice to exploit their allocated fishing opportunities”. Therefore we urge member states to apply Article 17 when distributing quota to their fishermen in 2017.

Recreational fisheries utilizing commercial style gears should also be limited and the Member States must shoulder that responsibility now. Furthermore, Member States should recognize the unique stock structure in SD 23 due to the trawling ban that has been in place since the 1930s. A closure for recreational rod and line fishing there would be of little value and should be considered separately from additional closures.

We also urge you to institute programs to maintain the knowledge base required to revive fishing in the future, and provide temporary emergency economic compensation under the EU Maritime and Fisheries Fund. Member states should also prepare to implement other measures, such as re-education, in case the stock fails to recover. Unfortunately that is a scenario that has to be seriously considered, and should be planned for.

Recommendation: The most important consideration when allocating Western Baltic cod TAC is precaution. The final TAC for Western Baltic Cod should be no more than 917 tonnes.

The TAC for SD 24 may be adjusted upward to account for Eastern cod caught there only if separate sub-TACs are allocated and managed for areas SD 22-23 and SD 24.

We urge Member States to apply Article 17 when distributing quota to their fishermen in 2017 to prioritize fishing opportunities for low impact fisheries, and to plan for other emergency economic and labour market measures.

Cod in Subdivisions 25–32, Eastern Baltic

Due to favourable environmental conditions and strong year classes towards the end of the 1970s, the eastern Baltic cod stock reached its highest recorded biomass levels in 1980–1982. From an early 1980s high of approximately 640 000 tonnes, high fishing mortality and poor environmental conditions contributed to a stock decline to only 87 000 tonnes by 1992. Fishing mortality remained high on this diminished stock through the 2000s.

Following the 2015 ICES benchmarking exercise, ICES determined that eastern Baltic cod is data-limited and it could not complete an analytical assessment. Key issues in the analytical assessment include the failure to confidently age cod, or quantify changes in cod growth and natural mortality. These issues, among others, increase uncertainty to such a degree that an analytical assessment is unusable.

Lacking an analytical assessment, ICES develops catch advice based on the ICES data limited framework. Comparing trawl survey data from the last five years, ICES estimates that the Eastern Baltic cod stock size has decreased by less than 20%. This converts into a total commercial catch advice for eastern Baltic cod of 26 994 tonnes.

Cod in the eastern Baltic is also harvested by Russia. According to recent communication with the Commission, the Russian share is calculated at 5% of the total Baltic cod TAC, in line with a previously negotiated TAC sharing arrangement. The Russian fishery is exclusively on

the eastern Baltic cod stock, thus the corresponding EU quota for eastern Baltic cod should be reduced in line with the agreement, resulting in an EU quota of 25 644 tonnes.

In 2014 and 2015 the Baltic experienced several significant inflows of oxygen-rich sea water, ending a decade-long stagnation in the central Baltic.⁴ While the inflow appears to have impacted cod condition positively, this improvement is still well below the longer term average. Previous expectations that the inflow would benefit cod productivity and recruitment have not yet materialized. In fact, the length at which juveniles reach sexual maturity (L50) in this stock is roughly 20 centimetres, the lowest in the recorded time series. This is an alarming figure, drawing surprise from scientists as far away as Canada, who asked in May of this year 'Are they still fishing this?'

Additional figures indicating the stock is in peril include parasite loading, generally poor condition over the long term (Fulton K factor), poor growth, questionable recruitment, and unexplainable high mortality of larger, older cod. These issues are similar to those observed in Newfoundland, Canada for decades following the collapse of the northern cod fishery.

Discarding of cod is considered to be a more substantial issue in the eastern Baltic than in the western Baltic. Observer data indicates that undersized cod represent nearly 13% of the total catch in tonnes, or 24% in numbers (18 million individuals), while landings data of undersized cod represent less than 2% in tonnes. This mismatch, due to discarding of undersized cod in circumvention of the landing obligation, is likely itself an underestimation of the true discard rate. Scientific observers in some Member States have been unable to board and observe fishing activities, and ICES has obtained information that fishers are illegally modifying their gear to increase catch rates of all cod, subsequently discarding undersized catch.

Recommendation: We urge Ministers to support ICES advice and, with the adjustments noted above to determine the EU portion of the TAC, allocate no more than 25 644 tonnes.

HERRING

The Baltic herring (*Clupea harengus*) is managed in four separate areas: Central Baltic Sea, Gulf of Riga, Western Spring Spawners, and Bothnian Sea and Bothnian Bay combined. The Central Baltic and Gulf of Riga herring stocks overlap in area 28. ICES provides its primary advice on the total catch of these stocks, then identifies the proportion of stock mixing and the resulting TAC for each management area. ICES advises separately on the two Bothnian stocks, with different levels of confidence in the assessments.

Herring in Subdivisions 20-24, Western Baltic Spring Spawners

Western Baltic spring spawning herring (*Clupea harengus*) is one of the more complex stocks to assess. Inter-annual variability in the migration patterns, migrations between the Baltic and North Sea management areas, catch distribution among fisheries, and stock mixing with central Baltic herring all add to the complexity. The stock biomass declined substantially from the early 1990s amid increased fishing mortality and reduced recruitment, reaching its lowest estimated SSB in 2011. Since that low, relative reductions in fishing mortality appear

⁴ Mohrholz V., Naumann M., Nausch G., Krüger S. and U. Gräwe. 2015. Fresh oxygen for the Baltic Sea – An exceptional saline inflow after a decade of stagnation. *Journal of Marine Systems*, 148: 152-166; Karnicki, S., BSAC General Assembly, 26 April 2016.

to be permitting growth in the SSB and the stock is now within safe biological limits, though recruitment is still low.

The total catch advised across the range of this stock is 56 802 tonnes. This stock is subject to a TAC setting procedure in annually negotiated agreements between the EU and Norway. The interpretation of this TAC rule allocates half of the advised catch to the Baltic SD 22–24, and the other half to the North Sea, or 28 401 tonnes.

Recommendation: We ask Ministers to support the Commission proposal for a TAC of no more than 28 401 tonnes, which is in line with the MSY approach and ICES advice.

Herring in Subdivisions 25–29 & 32, Central Baltic Sea, excluding Gulf of Riga

This is the largest of the Baltic herring stocks, composed of a number of local populations. Following a SSB decline below B_{lim} in the late 1990s, the stock has shown a steady increase and is now well above $MSY B_{trigger}$. Fishing mortality has remained below F_{MSY} since 2004. New data shows that the 2014 year-class of herring is the fourth largest since 1974.

Assuming catch is in line with ICES advice, 4 574 tonnes of the Central Baltic herring stock will be caught in the Gulf of Riga, and 223 tonnes of the Gulf of Riga stock will be caught in the Central Baltic. The corresponding TAC for the Central Baltic management area would recognise the mixing of these two stocks.

The corresponding TAC for this management area, recognising stock mixing, would be no more than 211 649 tonnes. Both EU and Russian fisheries pursue this stock. A previously negotiated TAC sharing agreement with Russia provides Russian herring fisheries 9.5% of the TAC. In order to not exceed scientific advice, Russian quotas must be reduced from the overall total catch to determine the EU quota. Reduced by 9.5%, the total EU quota would be 191 542 tonnes. The Commission proposal differs slightly from this figure, but is within an acceptable range of uncertainty.

Discards are considered negligible. Due to the introduction of the Landing Obligation, interspecies quota transfers are legally permitted up to 9%, within conservation constraints. The ICES advice does not consider any of these transfers, and notes that any future transfers should not result in overall harvests exceeding scientific advice.

Recommendation: We ask Ministers to support the Commission proposal for a TAC of no more than 191 129 tonnes, which is in line with the MSY approach and ICES advice.

Herring in Subdivision 28.1, Gulf of Riga

The Gulf of Riga is a semi-enclosed ecosystem of the Baltic Sea with lower salinity than the main basin, with the smallest and slowest growing individual herring in the Baltic. Herring is the dominant marine species in the Gulf, with few natural predators. Fishing mortality has been close to, but generally over, F_{MSY} , and has increased significantly in 2015 according to the current assessment.

As noted above, the corresponding TAC for the Gulf of Riga management area would recognise the mixing of this stock and Central Baltic Herring.

The Latvian fishery for Gulf of Riga herring is for human consumption purposes. Based on the concern about unsafe dioxin levels in herring over 17cm and the industry's unavoidable need for a different selectivity from the stock, we supported a Latvian proposal for a fishing mortality rate no greater than F-upper in the BSAC advice. A TAC set according to MSY F upper range would make it possible to limit the number of older fish. However until this unique challenge to selectivity requirements can be studied further, we support the Commission's proposal.

Recommendation: We ask Ministers to support the Commission proposal for a TAC of no more than 27 429 tonnes, which is in line with the MSY approach and ICES advice.

Herring in Subdivisions 3-31, Bothnian Sea & Bothnian Bay

Although ICES assesses these as two independent stocks with separate assessments, Council normally allocates a combined TAC. ICES confidence is higher for the Bothnian Sea stock, warranting the MSY approach. The Bothnian Bay stock is data limited. Due to the Council's combined TAC, the entire area TAC must be considered precautionary due to uncertainty in the Bothnian Bay herring assessment.

Due to low salinity and low mean temperature, herring in the Gulf of Bothnia is slow-growing and relatively small. The spawning stock biomass of Bothnian Sea herring tripled in the late 1980s, only to then drop by 40% by 1999. Since 2003, this stock's SSB has grown to the highest levels assessed in 20 years. While still high, ICES has dramatically revised the stock's estimated SSB downward in 2015 due to a necessary change in the assessment to handle ongoing uncertainty concerns. These concerns should diminish over time as the acoustic survey time-series grows.

Following a large decrease in the advice for 2016 relative to the change in assessed SSB (from 181 000 tonnes in 2015 to 96 613 tonnes for 2016), ICES has increased its advice substantially to 134 556 tonnes for 2017. Discarding is considered negligible.

Bothnian Bay herring is a small stock at the species' most northerly range under relatively extreme environmental conditions. A combination of low salinity, long winters, ice cover and cool summers affect this stock's growth. ICES categorises Bothnian Bay herring as data-limited and bases their 2017 advice on an exploratory assessment. Although uncertain, the survey index shows a relatively stable trend with a slight decrease, resulting in a precautionary increase in advice for catches no more than 6 442 tonnes. Discarding is considered negligible.

While a combined TAC risks overfishing the smaller stock in Bothnian Bay, ICES finds that this risk is low given the current stock development and fishing effort distribution.

Recommendation: We ask Ministers to support the Commission proposal for a TAC of no more than 140 998 tonnes, which is in line with the precautionary approach and ICES advice. We also ask Ministers to consider separating the management area to better represent the two Bothnian herring stocks.

SPRAT

Subdivisions 22-32

Sprat (*Sprattus sprattus*) is managed as a single stock across the Baltic Sea. Declining to below B_{lim} in the early 1980s, sprat has since recovered to well above $B_{trigger}$ reaching a maximum assessed SSB in 1996 of 1.9 million tonnes. Sprat stocks have since declined and rebounded, corresponding to relative changes in fishing mortality. ICES re-evaluated the assessment for this year, resulting in substantial estimated increases in biomass from 2012 to a predicted SSB for 2016 approaching the 1996 high. The Commission's proposed TAC reflects the EU portion after removal of estimated Russian catch from the ICES advice.

The revised assessment also estimates decreasing fishing mortality from 2012 to the present, predicted to be below F_{MSY} in 2016. This would be the first time fishing mortality is within long-term sustainable levels since 1994. ICES resulting total catch advice for 2017, reflecting increasing SSB and decreasing fishing mortality, is 314 000 tonnes, a 53% increase over previous advice. This significant increase is largely attributable to the stock biomass being revised upward.

Both EU and Russian fisheries pursue this stock. A previously negotiated TAC sharing agreement with Russia provides Russian sprat fisheries 10.08% of the TAC. In order to not exceed scientific advice, Russian quotas must be reduced from the overall total catch to determine the EU quota. Reduced by 10.08%, the total EU quota would be 282 349 tonnes.

Discarding is considered negligible.

Recommendation: We ask Ministers to support the Commission proposal for a TAC of no more than 282 349 tonnes, which is in line with ICES advice and the MSY approach.

SALMON

ICES advises on Baltic salmon (*Salmo salar*) catch within two management areas: the Main Basin and the Gulf of Bothnia (SD 22–31), and the Gulf of Finland (SD 32). Within these management areas Baltic salmon exist in a large number of river-specific populations ranging from healthy to vulnerable.

The last Baltic-wide management plan for Baltic salmon ended in 2010. The European Commission proposed a new plan in 2011 (COM(2011)470) which is still in negotiation. Currently salmon stocks are managed through EU quotas annually set in Council and individual Member State management of local salmon rivers. However the lack of an approved long-term management plan for Baltic salmon is particularly serious as Baltic salmon is listed under the Habitats Directive, obliging Member States to ensure "favourable conservation status". Salmon management targets are also included in the Water Framework Directive and the Marine Strategy Framework Directive.

Baltic salmon are particularly vulnerable to environmental conditions in their home spawning rivers. Dams and other forms of habitat destruction can prevent salmon from spawning at all. In many parts of the Baltic Sea region, particularly in the South, natural salmon populations have declined or disappeared.

In some larger rivers, hydropower companies are obliged to carry out major restocking programs, releasing salmon smolt (young salmon), in order to compensate for the loss of habitat and migration obstacles resulting from hydropower installations. The process of restocking is costly and ineffective. Today, reared fish die in high numbers before maturing to spawning adults. Although 5.5 million reared salmon smolts are released each year, compared to 2.9 million produced in the wild, salmon catches consist of between 72 and 92% wild fish.

Despite some positive developments, such as improved habitats in both spawning and nursery areas and subsequent increases in natural reproduction, the wild salmon in several rivers have not recovered. Juvenile salmon suffer higher than expected mortality. The reasons for this low survival are still largely unknown.

Baltic salmon populations remain depressed due to a combination of environmental factors including hydro-power and habitat destruction. Further problems include fishing mortality, substantial misreporting, low post-smolt survival and poor reproduction of some populations. Fisheries in open sea areas or coastal waters pose a greater threat to depleted stocks than fisheries in estuaries and rivers.

Recommendation: Management of salmon fisheries should be based on the status of individual river stocks, and fisheries on mixed stocks should be reduced as they present particular threats to stocks that do not have a healthy status.

Salmon in Subdivisions 22–31, Baltic Sea excluding Gulf of Finland

ICES assesses 29 rivers divided into 5 assessment units based on salmon biology and genetics. Since 1997 wild smolt production has increased substantially from very low values, particularly in the North. Smolt production in the Southeast shows no signs of improvement. Increases in smolt production are mainly due to increases in 2–3 rivers. The situation in the southernmost rivers is unchanged or deteriorating.

To evaluate the status of specific salmon runs, ICES uses the smolt production in 2014 relative to projected natural smolt production capacity on a river-by-river basis. The target for rebuilding stocks is to reach at least 75%⁵ of the estimated potential smolt production for each river. As an interim objective for weak stocks, 50% of the potential smolt production is used. Potential salmon biotope may still be underestimated in a number of salmon rivers such as the Pite River resulting in an incorrect potential smolt production. Out of 29 stocks assessed, only 4 rivers show a high probability of reaching the 75% target in the near future, while 18 rivers are less than 30% likely to reach this goal. Of those rivers, 7 are less than 30% likely to meet even the interim goal.

The rivers Rickleån, Kågeälven, and Öreälven in the Gulf of Bothnia, Emån in southern Sweden, and several other rivers in the Southeastern Main Basin are especially weak and desperately need longer-term stock-specific rebuilding measures.

Although not incorporated into the assessment, recent data suggests that M74 syndrome is increasing. M74 syndrome is caused by an unbalanced salmon diet focused predominantly

⁵ In the HELCOM Baltic Sea Action Plan and Finland, the target is 80 % of potential smolt production.

on young sprat, which lack adequate thiamine for the salmon's reproduction cycle. This deficiency is passed onto salmon eggs young salmon fry causing high mortality.⁶

ICES advises a total commercial catch at sea of 116 000 individual fish. ICES estimates the fishery will correctly report only 77% the total commercial salmon catch, with an additional 6% misreported, 7% unreported, and 10% unwanted. The handling of unwanted catch is less clear in the advice, but represents continuing discards in the historic catches table, including illegal and legal discarding through the exemption on seal-damaged fish. Thus the amounts of misreported, unreported, and unwanted catch must be deducted from the total commercial catch to determine the EU quota.

Recommendation: We urge Ministers to support a salmon TAC in the Baltic Sea, excluding the Gulf of Finland, of no more than 89 300 individual fish, which is calculated from ICES advice minus estimated mis- and unreported catch.⁷

Salmon in Subdivision 32, Gulf of Finland

This area contains a few small, wild populations with mixed reared and wild salmon caught in some rivers. The wild salmon populations are genetically distinct from each other, which indicate that these still are original salmon stocks, meaning that they have not reproduced with reared salmon. Reared salmon are easily identified by their missing adipose fin. This fin is removed before releasing a reared salmon into the wild. TAC management alone has been insufficient to improve the condition of wild salmon in the Gulf of Finland. This, among other reasons, triggered a 2016 EU special request on management measures for salmon in the Gulf of Finland.

ICES considers salmon stocks in the Gulf of Finland data-limited and advises using the precautionary approach. Very little data on wild smolt production is available for the assessment, consisting mainly of limited electrofishing surveys. Recreational sea and river catch is uncertain. In ICES expert judgement, all wild salmon rivers in the Gulf of Finland are well below the 75% potential smolt production target and generally not showing signs of recovery.

According to ICES, a reduction in the TAC alone would most likely not safeguard wild populations from exploitation. Instead, ICES advises the development of more selective harvesting methods that target reared salmon.

In response to the EU special request, ICES does not advise any quota transfers from SD 22-31 into SD 32. Any attempts to capture main basin salmon which migrate into the Gulf of Finland will likely increase catches on the local stocks, and ICES finds no biological basis to allow a higher harvest of local stocks. The assessment of Baltic salmon would however benefit from the inclusion of Gulf of Finland stocks, though ICES cannot determine the timeline to develop this combined assessment. In addition to setting TACs in line with ICES advice, which has not been done since 2011, ICES advises additional effort controls and

⁶ Keinänen, M., Uddström, A., Mikkonen, J., Casini, M., Pönöni, J., Myllylä, T., Aro, E., and Vuorinen, P. J. 2012. The thiamine deficiency syndrome M74, a reproductive disorder of Atlantic salmon (*Salmo salar*) feeding in the Baltic Sea, is related to the fat and thiamine content of prey fish. *ICES Journal of Marine Science*, 69: 516–528

⁷ The International Baltic Sea Fisheries Commission implemented a Baltic TAC sharing agreement between the EU and Russia in 1993, including a Russian salmon TAC share of 1.9% in SD 22-31 and 9.3% in SD 32. However there is no targeted fishery for salmon in Russia and relatively minor bycatch in the sea and coastal fisheries. While a shared stock, no reduction to the EU quota appears necessary.

improved enforcement to reduce illegal catches. Regarding a Finnish pilot study on sea trout survival from the Finnish gillnet fishery, ICES found that the pilot study was unrepresentative of salmon survival for a wide range of reasons, and did not advise any landing obligation exemptions based on the study.

Assuming a similar amount of restocking to previous years, ICES advises a total commercial catch at sea of 11 800 reared salmon, including a revised 2016 estimate of 81% wanted, reported catch, 16% unwanted catch and 3% unreported catch. The historic catch table clarifies that unwanted catch is all discarded for 2015, despite the implemented landing obligation, thus the amounts of unreported, and unwanted catch must be deducted from the total commercial catch to determine the EU quota.

Recommendation: We ask Ministers to support the Commission proposal for a TAC totalling no more than 9 403 salmon, with one important clarification. All catches should be reared fish only, with zero catches of wild salmon, corresponding to ICES advice and the precautionary approach.

PLAICE

Subdivisions 22-32

Plaice (*Pleuronectes platessa*) is the only flatfish species in the Baltic Sea subject to EU quota management. The landing obligation will apply to plaice catches beginning in 2017, thus total catch advice will correspond to a TAC for the Baltic management area. According to the annual scientific trawl survey, plaice stocks appear to be increasing strongly. ICES categorises the Eastern stock as data-limited, which limits increases in advice to 20%. Due to the area and stock range mismatch, and combination of a data limited stock, the entire area TAC must be considered precautionary. ICES advice identifies a western stock (SD 21–23) and an eastern, or Baltic, stock (SD 24–32). The corresponding Baltic TAC must be reduced by plaice catch in SD 21.

For the western stock, ICES applies the MSY approach for the 2016 advice resulting in total catch advice not to exceed 8 333 tonnes. ICES estimates that 36.7% of SD 21-23 plaice is caught in SD 21, resulting in 5 274 tonnes in SD 22-23.

ICES provides advice on the Baltic plaice stock in line with their precautionary approach. The resulting advice for Baltic plaice given the estimated increase in SSB is 2 587 tonnes. Adding the advised 5 274 tonnes in SD 22-23 results in a Baltic TAC corresponding to advice of 7 862 tonnes.

Both plaice stocks are subject to high levels of discarding as bycatch, but with the landing obligation this bycatch should be landed beginning in 2017.

Recommendation: We ask Ministers to support the Commission proposal for a TAC of no more than 7 862 tonnes, which is in line with ICES advice and the precautionary approach.