

23 August 2017

To: The Baltfish High Level Group

**Re: Input to the Baltfish High Level Group meeting, 1 September**

At the 2017 October Council, Ministers will decide upon fishing opportunities in the Baltic Sea for 2018. These will be based upon the Common Fisheries Policy (CFP) and the Baltic multiannual management plan (BMAP), which provide clear guidelines for maximising the sustainable yield. Baltfish, as the regional preparatory body, conducts the groundwork.

Environmental, social and economic objectives are to inform the decisions taken and quotas are set on the basis that  $F_{MSY}$  is the limit so as to enable biomass to grow to levels above  $B_{MSY}$ . However, the BMAP contains  $F$  ranges for several stocks, allowing fishing above the  $F_{MSY}$  point when the respective stocks are not at risk of impaired recruitment (above  $B_{lim}$ ). This is an unambitious target which is unlikely to facilitate medium term improvements in catches but will rather impair biomass growth.

The principle laid down in the CFP is clear. Quotas need to be below  $F_{MSY}$  in order to grow stocks above  $B_{MSY}$ . The deadline for this exploitation rate was 2015. We are now three years behind schedule and it is not clear why it has not been possible to meet this requirement.

**Recommendations for the cod TACs**

For Baltic cod stocks, the situation remains at best uncertain. Biomass is low, recruitment is at risk of impairment, and fishing mortality has been set above scientific recommendations.

Given the low biomass of the western Baltic cod stock and the corresponding high levels of uncertainty regarding recruitment, for which predictions are particularly uncertain for the coming years, we recommend that quotas are set in line with the precautionary principle at  $F_{lower}$ . Therefore, the TAC for western Baltic cod should be no more than 1,376 tonnes.

For the eastern Baltic cod stock, the condition is also opaque. It is currently a data limited stock, mainly because of difficulties with ageing the cod otoliths. The biomass is estimated to be 7% above MSY Btrigger<sup>1</sup>.

Of particular concern has been the stunted growth of eastern Baltic cod. ICES has made use of a small fish index and length at maturity, in their efforts to better understand the stock status. These tools are of particular use when considering fisheries-relevant components of the Marine Strategy Framework Directive Descriptor 3 in that a fish population exhibits “a population age and size distribution that is indicative of a healthy stock.”

The small fish index shows a steady decline in the amount of small fish in the stock, which may also indicate a fall in recruitment. Similar to western Baltic cod, eastern Baltic cod are maturing at record-setting smaller sizes, and what is assumed younger ages (since age cannot be verified in the eastern stock). The length at which eastern Baltic cod first mature has decreased from almost 40cm in the early 1990s to 20cm in 2016–2017. When seen in other cod stocks, this kind of stunted stock development has been associated with poor stock resilience, but the impact on reproductive capacity in the Baltic is still unknown. Combining these two elements, a decline in small fish and fish maturing at smaller sizes, suggests the stock is in an unhealthy state.

We therefore recommend that the eastern Baltic cod TAC should not exceed 24,767 tonnes, which is in line with the ICES advice based upon the precautionary approach once the Russian share, estimated to be 5% of the total TAC, has been deducted.

### **Stock mixing and the transfer of quota between the cod stocks**

Due to the increased abundance of eastern cod in SD 24 which is part of the western Baltic management area (SD 22-24), discussions took place to transfer quota from the eastern to the western TAC. When quotas were set by the Council for 2017, this transfer took place with the result that both cod stocks were overfished with quotas set above  $F_{MSY}$ .

The Fisheries Secretariat and Seas At Risk do not support this quota reallocation. Firstly, the quota transfer increases the risk of overfishing of the western cod stock. While there is evidence that in SD 24 on average 2.3 eastern cod specimen are caught for every one western cod, there is no requirement to fish the quota in this subdivision. Given that the stock biomass of western cod is below the lowest reference point, that recruitment has been very low for the past 10 years with the likely exception of 2017, and that most fishing takes place during the spring spawning season, such a quota transfer does not adhere to the precautionary principle. Risks should be avoided and ICES has noted that SD 22 is the weakest component of the stock.

Secondly, such a quota transfer would disenfranchise Member States' fishing industries that hold eastern but not western cod quota. As such, these reallocation proposals were voted

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<sup>1</sup> ICES 2017. Annex 7.7-Eastern Baltic Cod assessment using seasonal data and SPiCT

against by the Latvian Fisheries Association during heated discussions at Baltic Sea Advisory Council (BSAC) meetings. They, along with The Fisheries Secretariat, WWF, Coalition Clean Baltic, the European Anglers Alliance and the Finnish Association for Nature Conservation supported a quota of 1,376 tonnes<sup>2</sup>. The majority position, put forward by the Danish Fisheries Producer Organisation, entails quota being added to the western quota and at the same time not being deducted from the eastern quota. However, this is not in line with the BMAP Article 3 and would lead to overfishing of both cod stocks.

Member States have the possibility to make quota swaps with one another. It is the simplest and most reasonable approach for the eastern cod quota to cover eastern cod, while the western quota covers western cod. Quota can then be swapped between Member States to reflect changes in distribution.

### Redirecting the sprat fishery

For several years ICES has recommended spatial management of the stock, redirecting the sprat fishery away from SD 25 and 26. The rationale is to provide more food for the eastern cod stock where it is more abundant, and it would also improve the quality of sprat for human consumption<sup>3</sup>. Furthermore, there is evidence that where sprat density is very high and forms too large a part of the salmon diet<sup>4</sup> as is the case now, then salmon are more likely to develop the M74 syndrome, which according to this year's assessments has returned in significant and worrying numbers<sup>5</sup>.

The BMAP provides an opportunity for ecosystem-based management to be further implemented and the CFP contains as one of its main objectives the ecosystem-based approach to fisheries management. Baltic decision-makers have enough knowledge regarding these stock interactions to manage them in such a way to provide benefits to multiple species within the ecosystem.

Due to the evidence pointing to the lack of positive signs for the eastern stock as well as the significant increase of the M74 syndrome in salmon, we call on Baltfish to advise Ministers to act on the scientific advice and redirect the sprat fishery.

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<sup>2</sup> BSAC recommendations for the fishery 2018, p.3 - <http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-fishery-2018/BSACRecommendationsfishery2018FINAL070717.pdf.aspx?lang=en-GB>

<sup>3</sup> Casini, M., Käll, F., Hansson, M., Plikshs, M., Baranova, T, Karlsson, et al. 2016. Hypoxic areas, density-dependence and food limitation drive the body condition of a heavily exploited marine fish predator. Royal Society Open Science, 3: 160416. 15 pp

<sup>4</sup> Keinänen, M., et al. 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, Volume 69, Issue 4, p.516-528

<sup>5</sup> ICES, p.6 - <http://ices.dk/sites/pub/Publication%20Reports/Advice/2017/2017/sal.27.22-31.pdf>

**Table of quota recommendations**

<b>Stock</b>	<b>TAC recommendation for 2018</b>	<b>ICES advice for 2017</b>	<b>TAC for 2017</b>
<b>Cod 22-24</b>	1,376	917	5,597 (includes quota transfer)
<b>Cod 25-32</b>	24,767*	25,644	30,857
<b>Herring 22-24</b>	17,309	28,401	28,401
<b>Herring 25-29, 32 (without GoR)</b>	238,229	191,129	191,129
<b>Herring Gulf of Riga</b>	28,999	27,429	31,074
<b>Herring 30-31</b>	95,566	140,998	140,998
<b>Sprat 22-32</b>	262,310 (if fishery is redirected)	282,349	260,993
<b>Plaice 24-32</b>	6,272	7,862	7,862
<b>Salmon 22-31**</b>	79,585 individuals	89,320 individuals	95,928 individuals
<b>Salmon 32**</b>	8,669 individuals	9,403 individuals	10,485 individuals

\* Corrected typo on 28 August

\*\* After deducting unreported, misreported and discarded catch

## The landing obligation, control & enforcement

It is regrettable that the implementation of the landing obligation has thus far been a failure. 11 million cod or 20% of caught individuals are estimated to have been illegally discarded from the eastern stock alone<sup>6</sup>. This failure raises serious question marks as to the effectiveness of the regionalisation of the CFP. This scandal damages the reputation of both the fishing industry and managers.

Researchers have been impaired from collecting information and we now have a situation where scientists say they “have less discard data than before the landing obligation was introduced”<sup>7</sup>. This is of particular concern for the severely depleted cod stocks and their dependent fishing communities. We cannot expect stocks to recover and landings to increase while this continues.

According to the European Fisheries Control Agency (EFCA), demersal trawlers are the most likely segment to be discarding and should thus be the focus of inspections. Moreover, EFCA has identified the misrecording of species in midwater trawls as non-compliance with the landing obligation within the pelagic fisheries<sup>8</sup>.

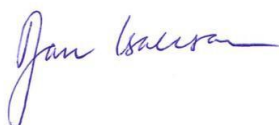
It is a serious matter when an industry shows blatant disregard for rules and laws. We strongly urge decision-makers to do their utmost to end this illegality. It is a matter of urgency that this situation ends.

## Recommendations for the pelagic TACs

For the pelagic stocks, both biomass and fishing mortality trends are positive. Managers have followed the scientific advice regarding quotas in recent years and the stocks have largely responded in the expected manner. The depletion of their predator, the cod, has contributed to a significant growth in biomass. It is of concern however that for several years the advice from ICES to redirect the sprat fishery has not been acted on.

We recommend that TACs continue to be set at  $F_{MSY}$  for these stocks.

Yours sincerely,



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Director  
Fisheries Secretariat (FishSec)



Dr. Monica Verbeek  
Executive Director  
Seas At Risk (SAR)

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<sup>6</sup> ICES WGBFAS Report, 2017, p.38 -

<https://www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2017/WGBFAS/01%20WGBFAS%20Report%202017.pdf>

<sup>7</sup> DiscardLess conference, March 2017 - <http://www.fishsec.org/2017/03/13/how-can-science-help-to-implement-the-landing-obligation>

<sup>8</sup> EFCA Annual Report for 2016, p.37&46

<https://www.efca.europa.eu/sites/default/files/EFCA%20Annual%20Report%20for%20the%20year%202016.pdf>

