

27 September 2017

To: The Fisheries Ministers of the EU Member States

**Re: Baltic TACs at the EU Fisheries Council Meeting, 9-10 October 2017**

Dear Minister,

On behalf of the Fisheries Secretariat (FishSec) and Seas At Risk (SAR) we send you our recommendations on the European Commission's proposal on fishing opportunities in the Baltic Sea for 2018, COM (2017) 461. We ask you to endorse them at the upcoming Fisheries Council meeting in order to ensure more a sustainable utilisation of our common marine resources.

We welcome the Commission's proposal, which is largely in line with scientific advice and EU commitments.

We emphasise the need to set fishing opportunities **below** the exploitation level that corresponds to maximum sustainable yield ( $F_{MSY}$ ) in order to restore and maintain fish stocks above levels capable of producing maximum sustainable yield as required by the CFP.

Our main recommendations regarding Baltic Sea TACs are as follows:

Stock and management area	Commission proposal	2017 TAC	SARFISH recommendation
Cod, Western Baltic, 22–24	5 597*	5 597	1 376
Cod, Eastern Baltic, 25–32	22 275*	30 857	24 767
Herring, Western Baltic Spring Spawners, 22–24	12 987	28 401	17 309
Herring, Central Baltic, 25–29 & 32	238 229	191 129	177 521–238 229
Herring, Gulf of Riga, 28.1	28 999	31 074	23 476–28 999
Herring, Gulf of Bothnia, 30–31	70 617	140 998	70 617–95 566
Sprat, Baltic, 22–32	262 310	260 993	197 061–262 310
Plaice, Baltic, 22–32	6 272	7 862	6 272
Salmon, Baltic, 22–31 ( <i>individual fish</i> )	106 096	95 928	78 400**
Salmon, Gulf of Finland, 32 ( <i>individual wild/reared fish</i> )	10 003	10 485	9 558***

\* Commission proposal assumes a quota transfer from the Eastern cod TAC to the western TAC

\*\*ICES advice after deducting unreported, misreported and discarded catch

\*\*\*All catches should be reared fish only, with zero catches of wild salmon


- With regard to **Eel** we call on Ministers to implement the Commission proposal prohibiting fishing on this endangered species. This should be extended to all areas of the EU.
- The **Eastern Baltic cod** stock shows little change from previous years. Adhering to scientific advice is particularly important for this vulnerable stock, especially given that the length at which the juveniles reach sexual maturity (L50) in this stock is roughly 20 centimetres, the lowest in the recorded time series. This alone is an indicator of an extremely stressed stock, and coupled with additional data it is clear that this stock is in peril.
- The **Western Baltic cod** stock is severely overfished, and continued overfishing is substantial. Reproduction is now clearly impaired and the biomass is below the critical limit value. The CFP and Baltic Multiannual plan were designed specifically to avoid the risk of recruitment failure, yet this has occurred after our repeated warnings. We therefore urge you to set a TAC of no more than 1376 tonnes, which corresponds to the provisions in Recital 13 and Article 5 of the Baltic multiannual plan.
- Salmon stocks remain diminished in most of the Baltic. For **Central Baltic salmon**, we recommend a TAC of 78 400 individual fish. This is in line with scientific advice that includes assumptions that actual catches will be much higher given the substantial amount of misreported and unreported fishing.
- For **salmon in the Gulf of Finland**, where wild salmon stocks are particularly low, we call on you to support the ICES advice for a total TAC of no more than 9 558 specimens, and have zero catch of wild salmon.

In addition to our TAC recommendations we also urge ministers to:

- Implement spatial management of the **sprat** stock by prohibiting fishing in SD 25. This is an additional measure to provide **eastern Baltic cod** with more food and to reduce the prevalence of M74 in **salmon**.
- Better control and enforce the landing obligation. Scientists estimate that over 11 million **eastern Baltic cod** were caught and illegally discarded last year. Discards of **plaice** catches are 100% in some areas.
- Update the Baltic management plan to correct for the fact that currently the **Bothnian Bay and Sea herring** stocks are managed together and lack reference points.
- Maintain the closed area during spawning season for **western Baltic cod**
- Further implement Articles 17 and 22 of the CFP Basic Regulation, in particular for the cod stocks, where small-scale fishermen lack quota and there is a mismatch between capacity and the available resources.

**The attached Annex I provides more detail and our rationale for the recommended TACs and Annex II provides recommendations with regard to the proposed closure of the eel fishery.**

Yours sincerely,



Jan Isakson  
 Director  
 Fisheries Secretariat (FishSec)  
 FISKESEKRETARIATET (FISH)  
 PRÄSTGATAN 9  
 SE-111 29 STOCKHOLM  
 SWEDEN  
[www.fishsec.org](http://www.fishsec.org)



Dr. Monica Verbeek  
 Executive Director  
 Seas At Risk (SAR)  
 SEAS AT RISK (SAR)  
 RUE D'EDIMBOURG 26  
 B-1050 BRUSSELS  
 BELGIUM  
[www.seas-at-risk.org](http://www.seas-at-risk.org)