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For the Attention of:

The BALTFISH High Level Group Chairperson
Danish Presidency c/o Sonja Østerlund Feldthaus
By email: sonfel@um.dk

cc: BALTFISH Member State delegates and Environment Ministry representatives

Date: 25 April 2018

Implementing ICES recommendations and advice on Sprat and Cod in the Baltic Sea

With reference to: ICES advice on fishing opportunities, catch, and effort for the Baltic Sea.
Published 31 May 2017.

- 1) Sprat: *spr.27.22-32*.¹
- 2) Eastern Baltic cod: *cod.27.24-32*.²

We would like to express our support for the ICES recommendation “that a spatial management plan is developed for the fisheries that catch sprat, with the aim to improve cod condition”, and the ICES advice that “restrictions on sprat catches taken in the main cod area should be established”, and enquire what action BALTFISH has taken, or plans to take.

The ICES recommendations and advice are in line with the ecosystem-based approach to fisheries management as outlined in Article 2 of the Common Fisheries Policy³ and within the remit of BALTFISH to take action as outlined in Article 8 of the Baltic Sea Multi-Annual Plan⁴.

¹ DOI: 10.17895/ices.pub.3255

<http://ices.dk/sites/pub/Publication%20Reports/Advice/2017/2017/spr.27.22-32.pdf>

² Version 4: 8 March 2018 DOI: 10.17895/ices.pub.3096

<http://ices.dk/sites/pub/Publication%20Reports/Advice/2017/2017/cod.27.24-32.pdf>

³ REGULATION (EU) No 1380/2013 - <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:354:0022:0061:EN:PDF>

⁴ REGULATION (EU) 2016/1139 - <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R1139&from=EN>

In 2016 BALTFISH discussed the relocation of pelagic fishing effort as part of the Technical Working Group report on “measures to improve the situation of Baltic cod stocks”⁵. The Presidency paper outlined the situation thus - ‘Given the protracted negative trend in cod status...relocating at least some parts of the pelagic fishing effort outside SD 25-26, as advised by ICES, should be seriously considered by managers”.

Member States concluded “most BALTFISH Members do not see this idea provided by ICES as worth pursuing further, at least until the newest ICES advice is available.” In the following years, ICES has however repeated its recommendation.

We understand that BALTFISH, with the agreement of its members, could propose a solution to respond to this important element of ICES advice, for example through a sprat TAC management measure, establishing a special condition restricting the part of the TAC to be taken in subdivisions 25 and 26.

Implementing such a policy to implement the ICES recommendations and advice is likely to aid the recovery of the eastern cod stock. When more sprat is available where cod juveniles are high in population this likely contributes to their growth.⁶

We also note that too much sprat in the diet of young salmon increases the prevalence of the M74 disease.⁷ By redirecting the sprat fishery northward, reducing catches in subdivisions 25 and 26, these stock interactions can be accounted for and can lead to a win-win for the stocks concerned i.e. more food for the cod and less sprat in the salmon diet.

We thank you for your attention on this issue and look forward to your response in due course.

Yours sincerely,

Ottilia Thoreson, Acting Director, WWF Baltic Ecoregion Programme

Janis Rozitis, Director, Pasaules Dabas Fonds

Jan Isakson, Director, The Fisheries Secretariat

Magnus Eckeskog, Oceans campaigner, Greenpeace Nordic

Conrad Stralka, Executive Director, BalticSea2020

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Sascha Müller-Kraenner, CEO, Deutsche Umwelthilfe

María José Cornax, Senior Director, Policy and Advocacy, Oceana

⁵ Baltfish Technical Working Group report - <https://www.fishsec.org/app/uploads/2016/04/Working-group-draft-report-on-cod.pdf>

⁶ Casini et al 2016, p.8, <http://rsos.royalsocietypublishing.org/content/royopensci/3/10/160416.full.pdf>

⁷ Keinänen et al 2012 <https://academic.oup.com/icesjms/article/69/4/516/635546>

Annex:

1) ICES advice on fishing opportunities, catch, and effort for the Baltic Sea Published 31 May 2017 - spr.27.22-32. DOI: 10.17895/ices.pub.3255

Extract:

“ICES recommends that a spatial management plan is developed for the fisheries that catch sprat, with the aim to improve cod condition. The abundance of cod in subdivisions 25–26 is high compared to other areas in the Baltic and the cod condition is considered to be limited by food availability.

Sprat and herring are important food items for cod (especially sprat), but the present high biomass of the two prey stocks is mainly distributed outside the distribution area for cod (Figure 3). Any fishery on the two prey species in the main cod distribution area (subdivisions 25–26) will potentially decrease the local sprat density, which may lead to increased food deprivation for cod (Casini et al., 2016).

The relative catch proportion of sprat in the main cod distribution area has since 2010 increased from 37% of the total catch to 47% in 2012–2016. Any increase in fishing pressure on sprat in the main cod distribution area may deteriorate the feeding condition for cod as prey availability decreases.

Restrictions on sprat catches taken in the main cod area should be established. Redistribution of the fishery to the northern areas (subdivisions 27–32) may also reduce the density-dependent effect, i.e. increase growth for the clupeids in the area. “

2) Baltic Sea Multi-Annual Plan (BSMAP)

REGULATION (EU) 2016/1139 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 6 July 2016

Technical measures

Article 8.1.c

1. The Commission is empowered to adopt delegated acts in accordance with Article 16 of this Regulation and Article 18 of Regulation (EU) No 1380/2013 regarding the following technical measures:

c) limitations or prohibitions on the use of certain fishing gears and on fishing activities, in certain areas or periods to protect spawning fish, fish below the minimum conservation reference size or non-target fish species, or to minimise the negative impact on the ecosystem;

3) BALTFISH Technical Working Group report: Measures to improve the situation of Baltic cod stocks. DATE OF FINAL REPORT

Extract:

“Food limitation for cod in SD 25-26 and possible relocation of pelagic fishing effort”

“For the last two years, ICES have advised that a spatial management plan for pelagic fisheries in subdivisions 25-26 would be desirable to improve cod condition. Sprat and herring are important food items for cod, but the present high biomass of the two prey stocks is mainly distributed outside the distribution area for cod. The relative catch proportion of sprat in the main cod distribution area has since 2010 increased from 37% of the total catch to 47% in 2014. This increase in fishing pressure on sprat may deteriorate the feeding condition for cod as prey availability decreases. Restrictions on sprat catches taken in the main cod distribution area should be established.”