

Stockholm & Brussels, September 30, 2010

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 26 October 2010

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations for the upcoming Fisheries Council regarding the European Commission's proposal on fishing opportunities in the Baltic for 2011 (COM(2010)470) and the EU negotiating mandate on tuna management under ICCAT. We ask you to support our recommendations in your deliberations at the Council meeting in order to ensure more sustainable utilisation of our common marine resources.

1. Proposal for a Council Regulation 'fixing for 2011 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea COM(2010)470'

Regarding Baltic Sea fish stocks, some alarming developments for Baltic salmon have been recorded lately. Post-smolt survival rates are down to around 10 percent and this autumn dramatic declines in the number of fish returning to spawn have been recorded for several important rivers. Many of the targets set out in the Salmon Action Plan adopted by the International Baltic Sea Fishery Commission in 1997 have not been reached. The situation is particularly serious as Baltic salmon also is listed under the Habitats Directive, obliging Member States to ensure "favourable conservation status". It is also covered by targets in the Water Framework Directive and the Marine Strategy Framework Directive.

Regarding fishing opportunities in the Baltic Sea for 2011, FISH and SAR call on you to:

- Reduce the TAC for salmon in the Main Basin and the Gulf of Bothnia by 68% to 120,000 individuals, as recommended by ICES and supported by STECF, or, as a bare minimum, by 30%. The proposed reduction of 15% is based on the questionable and seemingly arbitrary decision by STECF to regard Baltic salmon as a category 6 species (according to COM(2010)241), rather than, for example, category 3.
- Ensure that no wild salmon is caught in the Gulf of Finland, and take national measures to combat poaching.
- Set up programmes to monitor recreational catches, as there are indications that the decline in returning spawners is partially caused by non-commercial traps and nets close to the river mouths.
- Adhere to the cod management plan and support the Commission's proposal for both cod stocks, resulting in a 15% increase in Total Allowable Catch (TAC) for the Eastern stock and a 6% increase for the weaker Western stock; but effort

reductions are needed (in line with scientific advice) to help bring capacity down and to reduce incentives for highgrading and illegal landings.

- Consider further measures to deal with the increasing levels of bycatch and discards of Baltic cod, such as increased selectivity and real-time closures.
- Support severe reductions for the pelagic stocks, in line with the ICES advice. For Baltic sprat and Western Baltic herring the Commission proposal of a 30% reduction should be followed as a bare minimum. For Central Baltic herring, herring in the Gulf of Riga and herring in the Bothnian Sea/Bothnian Bay, we call on you to support the Commission proposal of -27%, -10% and -12% respectively.
- Consider how to attain the 2015 target of MSY in time for stocks exploited at higher levels in 2011 than suggested in the ICES MSY transition scheme.

See Annex 1 for more detailed comments on 2011 fishing opportunities in the Baltic Sea.

2. EU negotiating mandate for the annual meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT) on 17–27 November

The Atlantic bluefin tuna has rapidly declined over the past few decades and is in a highly critical state. The ICCAT annual meeting will be particularly crucial for the future of the Atlantic bluefin tuna, as progress of current management plans for reducing fishing capacity and farming capacity will be reviewed and a three-year recovery plan for bluefin tuna by 2022 should be agreed.

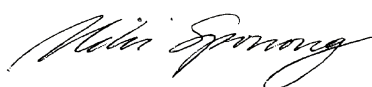
At the October Council meeting, FISH and SAR call on you to give a detailed mandate to the EU for the upcoming ICCAT negotiations, including the following:

- An ambitious three-year recovery plan with a high probability of success (at least >80%), including a TAC well below the current level of 13,500 tonnes, a closure of all the known spawning areas in the Mediterranean to fishing, and ideally a suspension of the industrial (purse seine) fishery.
- An immediate suspension of the industrial fishery in 2011 until the ICCAT SCRS is in a position to advise with confidence as to what level of catch will achieve ICCAT's rebuilding target.
- That the pending payback scheme for fishing over the quota of 1,500 tonnes annually for 2011 and 2012 is not lifted again this year, as this would have far-reaching consequences not just for the tuna but for the credibility of the CFP.
- An extension of the ICCAT observer programme to cover all fishing operations.

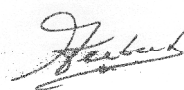
See Annex 2 for more detailed comments on the EU mandate for the ICCAT meeting.

REGARDING THE CURRENT NEGOTIATIONS with Norway, Iceland and the Faroes on **mackerel quota**, we would like to emphasize that we need a political solution that provides a total catch that is in line with the scientific advice for the stock.

Yours sincerely,



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Fisheries Secretariat (FISH)



Monica Verbeek
Executive Director
Seas At Risk (SAR)