FISH
FISKESEKRETARIATET
THE FISHERIES SECRETARIAT

SEAS AT RISK

Stockholm & Brussels, 16 September, 2014

To: The Fisheries Ministers of the EU Member States

Re: Input to the EU Fisheries Council meeting, 13–14 October 2014

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations on the European Commission's proposal on fishing opportunities in the Baltic for 2015 (COM(2014)552). We ask you to endorse them in your deliberations at the upcoming Fisheries Council meeting in order to ensure more sustainable utilisation of our common marine resources.

We welcome the Commission's proposal, which is largely in line with the objectives of the reformed Common Fisheries Policy (CFP), the principles set out for the fixing of fishing opportunities in the earlier Commission Communication (COM(2014)388), as well as scientific advice. This decision on the Baltic Sea TACs will be the first test of the new management objectives and your willingness as Minister to firmly support the agreement. In addition, most Baltic stocks – cod, herring, sprat and salmon – will be covered by the EU landing obligation from 1 January 2015, and therefore the fishing opportunities proposed now are total catches, including former discards.

In short, this is our recommendations:

- For the **western Baltic cod** stock we call on you to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.
- The Commission has not proposed a TAC for the **eastern Baltic cod stock**, but due to the exceptional circumstances – it is now classified as data-limited – we call on you to support the ICES advice to apply an "uncertainty cap" resulting in a total catch of 29 085 tonnes. However, a prompt implementation of the landing obligation is of great importance, as it will provide better data on the total catches and could contribute to a faster stock recovery. Therefore, a roll-over of the total catches in 2013 – including estimated discards – of 36 356 tonnes could be considered.
- For **western Baltic herring**, **central Baltic herring** and **Gulf of Riga herring** we call on you to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.
- For **herring in the Bothnian Sea and Bay** we suggest a more modest increase in the TAC of 15 per cent, resulting in 158 700 tonnes – considering the large uncertainties in the scientific data underpinning the assessment, and the continuous overestimations of the productivity of these stocks.
- For **Baltic sprat**, we call on you to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.
- For **salmon in the Main Basin and the Gulf of Bothnia**, we call on you to recommend a total commercial catch at sea for 2015 of no more than 82 000 individuals (based on the reported catch for 2013 + an estimated discard of 3 000 undersized individuals). The

FISKESEKRETARIATET (FISH)
PRÄSTGATAN 9
SE-111 29 STOCKHOLM
SWEDEN
www.fishsec.org

SEAS AT RISK (SAR)
RUE D'EDIMBOURG 26
B-1050 BRUSSELS
BELGIUM
www.seas-at-risk.org

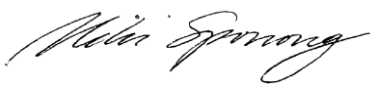
ICES advice for this area includes estimated discards of seal-damaged fish, as well as unreported and misreported catches – none of which will be addressed by the landing obligation if the BALTFISH recommendation to exclude seal-damaged fish in the discard ban plan prevails.

- For **salmon in the Gulf of Finland**, we call on you to recommend a total commercial sea catch of less than 9 864 individuals for 2015, including the 81 per cent reported wanted catch and the estimated 2,6 per cent discard of undersized fish ("unwanted catch") . There should be no commercial fisheries on wild salmon in this area, and subsequently all salmon caught in the Gulf of Finland that retains its adipose fin should be released. This should be possible even with the discard ban because of the proposed exemption for trap-nets.
- We also urge you to support the Commission proposal for **plaice**.

See Annex 1 for a summary of the ICES advice and more detailed comments on 2015 fishing opportunities in the Baltic Sea.

Finally, we urge you to progress, without any further delay, the deep-sea file in order to ensure sustainable management of deep-sea fisheries and the protection of vulnerable marine ecosystems in the deep sea.

Yours sincerely,



Niki Sporrong
Director
Fisheries Secretariat (FISH)

Dr Monica Verbeek
Executive Director
Seas At Risk (SAR)

FISH
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THE FISHERIES SECRETARIAT

SEAS AT RISK

Annex 1: On the proposal for a *Council Regulation fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2015* (COM(2014)552)

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.

The International Council for Exploration of the Sea (ICES) advice on the Baltic Sea fish stocks was published on the 30 May 2014. It was supported in its entirety by the Scientific, Technical and Economic Committee on Fisheries (STECF) in June[1]. The following provides a summary and comment on the proposal, as well as the scientific advice.

We have divided our comments into sections by species, starting with demersal, continuing with pelagic and salmon stocks, and ending with flatfish. Recommendations are given at the end of each section.

OBJECTIVES AND SCIENTIFIC ADVICE ACCORDING TO THE NEW CFP

The Commission proposal (COM(2014)552) is the first proposal for fishing opportunities under the reformed Common Fisheries Policy (CFP), which revised the long-term targets for EU commercial fish stocks – importantly Article 2.2:

The Common Fisheries Policy shall apply the precautionary approach to fisheries management, and shall aim to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield.

In order to reach this objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield, the maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and on a progressive, incremental basis at the latest by 2020 for all stocks.

These objectives are also in line with the EU commitment made in Johannesburg in 2002[2].

Rather than focusing on avoiding an undesired outcome – as is the case with the precautionary approach – the Maximum Sustainable Yield (MSY) framework strives at *achieving a desired* outcome: a high sustainable long-term yield.

Exploitation rates (F_{MSY}) in line with the MSY target are estimated to maximise the average long-term catch. ICES defines B_{MSY} as the Spawning Stock Biomass (SSB) that results from fishing at F_{MSY} for a long time. The fishing mortality (F) is a measure of the number of fish killed by fishing. The Spawning Stock Biomass (SSB) for the stock is the

[1]Scientific, Technical and Economic Committee for Fisheries (STECF) (2014). Review of scientific advice for 2015, part I: Advice on stocks in the Baltic Sea (STECF-14-10). Publications Office of the European Union, Luxembourg, EUR XXXX EN, JRC XXXX, 41 pp.
[2]Johannesburg Declaration, WSSD, 2002.

reproductively mature fish, measured in tonnes. A biomass reference point – MSY $B_{trigger}$ – is used within the MSY framework and should trigger a "cautious response" when the biomass is estimated to fall below it. In practice it is often set at Bpa – the precautionary reference point for SSB – even though the two concepts have a different basis. MSY $B_{trigger}$ is also said to constitute the lower range of B_{MSY}.

In 2012, ICES developed a framework for quantitative advice regarding data-limited stocks, which forms the basis for the data-limited approach in quota management. The advice for data-limited stocks is essentially based on a combination of biomass indices and landings data (depending on what is available), and a ±20 per cent "uncertainty cap" is applied to the previous years' advice or so-called *status quo* landings. ICES identified six different categories of data-limited stocks, and several of the Baltic Sea stocks falls within these categories – most notably, the eastern Baltic cod stock has been classed as data-limited in this year's assessment.

Because of the upcoming implementation of the new EU landing obligation – also called the discard ban – some new terminology has been introduced in the advice for 2015. "Wanted catch" is now used to describe fish that would be landed in the absence of the EU landing obligation, whereas "unwanted catch" refers to the previously discarded component. In some cases, the total catch – i.e. the catch quota – is not known due to poor discard data from previous years. It is hoped that the discard ban will gradually improve the knowledge of all catches and give a fuller picture of overall fishing mortality.

COD

Since 2004, the Baltic Sea cod (*Gadus morhua*) is managed as two separate stocks: the eastern and the western stock. The stocks are biologically distinct from one another, although there is some migration of fish between the areas. In 2007, a multi-annual plan for both stocks was adopted (EC 1098/2007), which aims at restoring the cod stocks to sustainable levels and keeping them there.

Due to the recently observed changes in (individual) growth rate of the eastern cod, ICES states that no multi-species advice can be delivered for 2015, as unchanged growth is assumed in the modelling used for multispecies catch projections.

Cod in Subdivisions 22–24, Western Baltic

The western Baltic cod stock is highly productive and has historically been about 25 per cent larger than it is today. In the 1970s and 1980s it was twice its current size. Since the late 1990s, the stock has been fluctuating between the precautionary biomass level (Bpa) and the level where stock recruitment could be at risk (Blim).

The cod in this area does not belong to one homogeneous genetic population and three potential spawning sites have been identified: the Sound (SD 23), the Belt Sea (SD 22) and the Arkona basin (SD 24). Spawning occurs during different periods of the year and ICES advises that measures to protect local spawners in the Belt Sea should be taken. There are also some recent studies indicating that local measures should be taken to protect spawners in the Sound[3].

[3]Lindegren, M., Waldo, S., Nilsson, P. A., Svedäng, H. and A. Persson. 2013. *Towards sustainable fisheries of the Öresund cod (*Gadus morhua*) through sub-stock-specific assessment and management recommendations.* ICES Journal of Marine Science, 70: 1140–1150.

The degree of mixing between the eastern and western cod stocks is estimated to have increased in recent years, particularly in SD 24; it is considered to be substantial and likely to increase uncertainties in the assessments.

The western cod stock was benchmarked in 2013 and it was concluded that ICES has consistently overestimated the fishing possibilities during the last years. Despite the fact that catches have been below the agreed TAC since 2010, the fishing mortality (F) has not declined as anticipated. It is still roughly twice the calculated F_{MSY} = 0.26, and has even remained above the long-term target set in the management plan.

The existing cod management plan aims at rebuilding the stock by limiting the annual catches and there is a ±15 per cent restriction on changes in the total allowable catch (TAC). It also sets out to reduce fishing effort (number of fishing days) by 10 per cent annually until the target fishing mortality (F = 0.6) has been reached. In this year's assessment, ICES states that the current management plan can no longer be considered precautionary and is therefore basing its advice on the MSY approach, including estimated "unwanted catch".

Bycatch in the fishery mostly consist of flatfishes, especially flounder, which can be substantial at times. Some actions have been taken in the past to reduce discards and in 2001 modifications to fishing gear were introduced by the International Baltic Sea Fisheries Commission (IBSFC), including the "Bacoma" cod-end. The fishing industry has pointed out that these measures are ineffective and that increased flounder bycatch interferes with the selectivity of the gear, leading to increased cod discarding.

In accordance with the MSY approach, the proposed Total Allowable Catch (TAC) for western Baltic cod is 8 793 tonnes in 2015, including estimated unwanted catches. This is in line with the ICES advice and corresponds with a fishing mortality rate at MSY. It would almost halve the fishing possibilities for next year (-48 per cent). Following the management plan would yield a total commercial catch of 17 065 tonnes.

For the western Baltic cod stock we call on Ministers to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.

Cod in Subdivisions 25–32, Eastern Baltic

The eastern Baltic cod stock has historically been much larger than it is today. Due to very favourable environmental conditions and extremely strong year classes towards the end of the 1970s, the stock reached its historically highest levels in 1980–1982, when it was more than twice the size of today. In the early 21st Century, however, the stock was severely overfished and at risk of collapse. In recent years, supported by the multiannual plan, the stock was thought to be recovering.

Today, it is in trouble again, labelled as "vulnerable" by both HELCOM and the International Union for Conservation of Nature (IUCN) due to the threat of synergistic effects of eutrophication and climate change[4]. Over the past two years, the spawning stock biomass (SSB) is estimated to have decreased by more than 20 per cent. The main reason seems to be that the stock currently consists of a disproportional amount of

[4]HELCOM, 2013. Species Information Sheet for Cod: www.helcom.fi

small and thin individuals[5], coupled with a dramatic decline in the number and biomass of larger individuals.

At first, the primary cause of this was believed to be a lack of sprat and herring in areas with a lot of cod (i.e. SD 25). However, new information indicates that at least seasonally the occurrence of sprat may be high enough in the southern Baltic Sea, where cod is most abundant[6]. Additional factors related to the spread of hypoxic bottoms (as a result of eutrophication) may also explain the poor body condition of eastern Baltic cod. Swedish scientists recently concluded that a combination of hypoxic bottoms and competition for space control the population[7]. Due to the low oxygen levels, the benthic areas that cod can inhabit and where they can find other prey than clupeids (e.g. benthic invertebrates) have declined.

Baltic cod in general is highly limited by hydrological conditions (salinity and oxygen levels in bottom water) and recent reproduction has only been reported from the Bornholm Deep (SD 25) and to lesser extent in SD 26. The abundance of cod in northern areas is nowadays very low.

Because of the skewed geographic distribution and the species interactions between sprat, herring and cod, ICES is suggesting that a spatial management plan should be devised and implemented for herring and sprat, particularly in subdivisons 25–26. Decreased fishing effort on sprat and herring in SD 25–26 would likely optimize the growth of cod (more clupeids would become available for the growing cod stock), whereas increased effort in SD 27–32 would optimize the yield and growth of sprat and herring (by reducing the competition for food).

In the most recent assessment, ICES classified the eastern cod stock as data-limited. There are three main areas of concern: 1) the observed changes in growth rate have made age reading more difficult and discrepancies among different scientists more pronounced; 2) the high proportion of slimmer individuals might have affected the "catchability" in fisheries and surveys, creating biased results; and 3) the rapid decline of larger individuals makes it difficult to determine whether they die from fishing or natural causes. All these concerns have led to a rejection of the age-based assessment used in the past.

Therefore, the current ICES advice is based on trends in SSB and the so-called *status quo* catch. Last year, only 36 356 tonnes were caught – 46 per cent of the TAC, including estimated discards. The low quota uptake can partially be explained by the reduced growth rate, resulting in whole age groups being below the legal minimum landing size. This has also led to increased discarding of undersized cod.

Since the SSB is estimated to have declined with more than 20 per cent, the ICES advice for 2015 is a 20 per cent reduction of the total *status quo* catch in 2013, resulting in total catches of no more than 29 085 tonnes. This is based on the data-limited approach and includes "unwanted catches" previously discarded. No alternative under the current management plan is provided. The Commission has not included a proposal for eastern

[5]Eero, M., Vinther, M., Haslob, H., Huwer, B., Casini, M., Storr-Paulsen, M. and F. Köster. 2012. *Spatial management of marine resources can enhance the recovery of predators and avoid local depletion of forage fish.* Conservation Letters, 5(6): 486–492.
[6]Stefan Neuenfeldt, National Institute of Aquatic Resources, Technical University of Denmark, *pers. comm.*, 2014.
[7]Joachim Hjelm, Swedish University of Agricultural Sciences, *pers. comm.*, 2014.

cod due to the uncertainties in the assessment, but indicates that it will do so later in September.

Due to the exceptional circumstances for the eastern Baltic cod stock, we call on Ministers to support the scientific advice for a total catch of 29 085 tonnes, in order to give the stock a chance to recover.

However, a prompt implementation of the landing obligation is of great importance, as both scientists and managers need better data on the total catches in order to device management measures that will facilitate stock recovery. Therefore, if no agreement can be found that supports both the ICES catch advice and the implementation of the landing obligation, a roll-over of the total catches in 2013 of 36 356 tonnes could be considered.

HERRING

The Baltic herring (*Clupea harengus*) is managed in four separate areas: the Western Baltic and Kattegat, the central Baltic, the Gulf of Riga, the Bothnian Sea and Bothnian Bay.

Herring in Subdivisions 25–29 and 32, Central Baltic, excluding the Gulf of Riga

This is the largest of the Baltic herring stocks, but it is really composed of a number of local populations. After a dip in the late 1990s, the stock has shown a steady increase since the beginning of the 2000's and is now at about 70 per cent of the long-term average.

The strong increase of the sprat stock in the 1990s (SD 27–29 and 32) increased the competition for food between herring and sprat, and the mean weight of herring remains low. The herring stock is also affected by cod predation, and the size of the eastern cod stock may have a significant impact, but only in the southern areas (mainly SD 25) where cod is abundant. Thus predation from cod will have a limited effect on the Central Baltic herring population as a whole.

Because of the species interactions between sprat, herring and cod, ICES is suggesting more spatial management of herring and sprat, particularly in subdivisons 25–26. Increased fishing effort in SD 27–32 would likely optimize the yield and growth of sprat and herring by reducing the competition for food.

ICES classifies the stock as being harvested sustainably and at full reproductive capacity. The fishing mortality under the MSY approach (F_{MSY}) has been set to 0.26. Bycatch and discarding are assessed as negligible and therefore the advice is on the total catch under the landing obligation.

For 2015, the Commission is proposing a TAC of 170 185 tones – an increase of 51 % compared to last year. ICES recommended total catches of less than 193 000 tonnes (including Russia).

For central Baltic herring, we call on Ministers to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015. However, we want to remind the Member States about the scientific uncertainties in this assessment and consider this in the discussions.

Herring in Subdivision 28.1, Gulf of Riga

The Gulf of Riga is a semi-enclosed ecosystem of the Baltic Sea and the low salinity restricts the occurrence of marine species. Herring is the dominant species in the Gulf, and predation mortality is low.

The recruitment of Gulf of Riga herring is highly dependent on environmental conditions, such as ice cover. Since the 1989, the majority of winters have been mild, and this climate has been favourable for its reproduction. The mean weight started to decline in the mid-1980s and remains on the low side.

A mix of Gulf of Riga herring and central Baltic herring is caught in subdivisions 28.1 and 28.2. Therefore, the TAC set for Gulf of Riga herring includes a small proportion of central Baltic herring, currently 12.8 per cent of catches or approximately 3 950 tonnes, and vice versa for central Baltic herring. An almost negligible amount (0.8 %) of Gulf Riga herring is estimated to be taken in subdivision 28.2 together with central Baltic herring.

The fishing mortality consistent with MSY has been set to 0.35. However, the ICES models suggested two different candidate values for F_{MSY}: 0.35 and 0.26. The higher value now used by ICES should only be applied together with a 20 per cent limit on the variation of the annual TAC. Discard and illegal/unreported catches are considered negligible, and the advice is therefore for total catch under the new landing obligation.

For 2015, the Commission is proposing total catches of 38 780 tonnes – an increase in the TAC of 26 per cent. ICES recommends total catches of no more than 34 300 tonnes, resulting in a fishing mortality of 0.35 in line with the MSY framework. The discrepancy is due to a difference between the stock and the management area, with the Commission proposal including estimated catches of central Baltic herring in the Gulf of Riga[8].

For Gulf of Riga herring we call on Ministers to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.

Herring in Subdivision 30, Bothnian Sea, and Subdivision 31, Bothnian Bay

Due to low salinity and mean temperature, the herring in the Gulf of Bothnia is slow-growing and relatively small. The two separate herring stocks in the Bothnian Sea and Bothnian Bay are currently managed together, though data for the weaker, most northern stock is more limited. There are no specific management objectives or long-term management plan for these stocks, but according to ICES the joint TAC might not adequately protect the weaker stock.

In the whole region, the body weight of herring has decreased over the last 20 years. This might be due to a combination of a decrease in zooplankton prey, density-dependent effects and selective seal predation – though seal predation is considered to have a minimal impact on the stock. The weight decrease has had financial consequences for the Swedish fishery, as the production of "surströmming" demands a greater size.

[8]Scientific, Technical and Economic Committee for Fisheries (STECF). Review of scientific advice for 2015 - part I: Advice on stocks in the Baltic Sea (STECF-14-10), page 24.

The spawning stock biomass of **Bothnian Sea herring** tripled in the late 1980s, only to then drop by 40 per cent by 1999. Since 2003, it has increased again and is now on a record-high level. However, ICES has flagged great uncertainty around the estimates for the past two years.

ICES classifies Bothnian Sea herring as being harvested in a sustainable way and the TACs in recent years are the highest ever recorded – almost three times the TAC in 2007/2008. However, the quotas have not been limiting catches since 1991 due to low market demand. The fishing mortality consistent with the MSY approach has been set to 0.15 and discarding is considered to be negligible.

Bothnian Bay herring is a very small stock, existing under extreme environmental conditions [for herring]. A combination of low salinity, long winters, ice cover and cool summers affect the growth. Average weight has decreased since the 1990s. Both the stock size and the fishing mortality are uncertain, and it is classified as a data-limited stock. ICES uses biomass index values in combination with recent landings data to provide its indicative advice, which shows an increasing trend for the past two years. Discarding is considered to be negligible.

The Commission proposal for the herring stocks in the Bothnian Sea and Bothnian Bay is 186 534 tonnes – an increase of 35 per cent. This is consistent with the ICES advice for the two stocks: catches of no more than 181 000 tonnes for herring in the Bothnian Sea and 5 534 tonnes for herring in the Bothnian Bay.

FISH, together with the rest of the Baltic Sea Advisory Council (BSAC), suggests a more modest increase in the TAC for herring in the Bothnian Sea and Bay – 15 per cent, resulting in 158 700 tonnes – considering the large uncertainties in the scientific data underpinning the assessment, and the continuous overestimations of the productivity of these stocks. We also believe it would be better to separate the management of the two stocks, in order to better protect the data-limited northern stock.

Western Baltic herring in Division IIIa and Subdivisions 22–24

This stock is usually called western Baltic spring spawning herring. In summer, it migrates from the western Baltic (SD 22–24) into the more saline waters of Division IIIa and the eastern parts of Division IVa in search of food. In these areas, it mixes with North Sea autumn spawning herring. For this reason, the two stocks have traditionally been managed together. In recent years, mixing with the central Baltic herring population (SD 24–26) has also been detected.

The western Baltic herring stock has largely been declining since the early 1990s. Despite decreasing catches during the same time period, the spawning stock biomass (SSB) continued to decline until it hit an all-time low in 2011. Recruitment is still below average and the reasons for the poor recruitment since 2006 are unknown, but most likely due to increased mortality at the egg or larval stage.

There is currently no long-term management plan for western Baltic spring spawning herring, but the IIIa TAC rule implies that half of the advised catch is set as a TAC for subdivisions 22–24, and the other half for the North Sea. A management strategy for

both stocks, including procedures for setting the quotas in Division IIIa, was agreed by the EU and Norway in March 2014, but has not yet been evaluated by ICES.

The ICES advice is based on the MSY approach and "wanted catch". Despite the poor recruitment, the stock is estimated to be above MSY $B_{trigger}$ in 2014 – the lower range of B_{MSY} – and to be at full reproductive capacity under the precautionary approach. The fishing mortality – the proportion of the stock taken in the fishery – has decreased gradually but was still above F_{MSY} in 2013. It has not been possible to properly quantify discards, but indications are that they are low – below the "bycatch ceiling" in recent years.

The target fishing mortality (F_{MSY}) has been set at 0.28, and the MSY $B_{trigger}$ has been set at 110 000 tonnes – equal to Bpa.

The Commission proposal for western Baltic herring is a total catch of 22 220 tonnes for 2015 – an increase of 12 per cent – including the previously unwanted catch (seems to be set to 0 tonnes due to a lack of data). ICES advised on a "wanted catch" of western Baltic herring in divisions IVa east, IIIa and subdivisions 22–24 of no more than 44 439 tonnes, stating that the resulting total catch cannot be quantified.

For western Baltic herring, we call on Ministers to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.

SPRAT

Sprat (*Sprattus sprattus*) appears to be spread out all over the Baltic Sea and is the largest fish stock in the region. It is managed as a single stock in subdivisions 22–32 – basically the entire Baltic Sea.

The stock is highly affected by the abundance of cod, its main natural predator. Therefore, spawning stock biomass was low in the first half of the 1980s, when the cod stocks were very large. In the beginning of the 1990s it started to increase and reached the maximum spawning stock biomass ever recorded in 1996–1997 at 1.7 million tonnes. Since then it has declined – fluctuating around 1 million tonnes since 2002 – and none of the last four year classes have been strong.

As with Baltic herring, the mean weight of Baltic sprat is currently low; in the 1990s, it decreased by around 40 per cent. This decrease in weight is especially prominent in the northern Baltic (SD 27–29 and 32), where most of the sprat is currently concentrated.

Because of the skewed geographic distribution and the species interactions between sprat, herring and cod, ICES is suggesting that a spatial management plan should be devised and implemented for sprat and herring. Decreased fishing effort on sprat in SD 25–26 would likely optimize the growth of cod (more sprat would become available for the growing cod stock), whereas increased effort in SD 27–32 would optimize the yield and growth of sprat and herring (by reducing the competition for food).

Fishing mortality is currently estimated to be above both the MSY target (F_{MSY} = 0.29) and the precautionary approach. Discards are estimated to be negligible and a total catch advice is provided. MSY $B_{trigger}$ is assumed to be equal to Bpa.

For 2015, the Commission proposes a TAC of 199 622 tonnes, which is in line with the ICES advice and a 17 per cent decrease relative to last year. ICES recommended total catches of less than 222 000 tonnes (including Russia).

For Baltic sprat, we call on Ministers to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.

SALMON

The Baltic salmon (*Salmo salar*) is a unique branch of the Atlantic salmon species. The management of Baltic salmon is currently divided into two areas: the Main Basin and the Gulf of Bothnia (SD 22–31) and the Gulf of Finland (SD 32). But, in reality, Baltic salmon consists of a much larger number of river-specific populations, some of which are still very vulnerable.

Baltic salmon is greatly affected by environmental conditions, especially those prevalent in the rivers of their origin to which they return to spawn. Dams and other forms of habitat destruction have had a devastating effect on salmon habitats and spawning grounds in the freshwater environments. In many parts of the Baltic Sea region, particularly in the south, the natural salmon populations have declined or even disappeared.

In some of the bigger 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 that the hydropower installations have resulted in. The process of restocking is very costly and ineffective. Today, reared fish die in high numbers before becoming adult. Even though 5.5 million reared salmon smolts are released each year, compared with 2.9 million naturally produced, salmon catches consist of between 72–92 per cent wild fish.

Baltic salmon has earlier suffered from a reproduction disorder called M74. The occurrence of M74 has been decreasing since the mid-1990s to a currently low level. However, M74 mortality has varied over the years and sudden changes in the incidence of the disease are likely to occur in the future.

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 has not recovered. Also, the positive trend has been countered by a steep decline in the survival of juvenile salmon (in the post-smolt life stages, when entering the sea). This decline has reduced fishing possibilities considerably. The reasons for this low post-smolt survival are still largely unknown, but the effects are rapidly limiting the effectiveness of the available management tools.

A ban of the Baltic Sea drift net fishery came fully into force in January 2008, and for a period of time the salmon catches decreased. By 2010, the long-line fishery for salmon had increased dramatically and catches were back to earlier levels. Since then, however, the catches in the offshore fishery have declined again and are now even lower than in 2008. The coastal fishery also shows an overall declining trend. River catches have increased since 2011, possibly because of the relatively large spawning runs in 2012 and 2013. According to ICES, the different aspects affecting the fishing effort and catches are 1) regulatory measures, 2) marketing restrictions due to the high dioxin content and 3) increased seal damage to both gear and catch.

To date, many of the targets set out in the Salmon Action Plan adopted by the International Baltic Sea Fishery Commission (IBSFC) in 1997 have not been reached. A new management plan was proposed by the Commission in 2011 (COM(2011)470), but has not yet been adopted. This lack of long-term management is particularly serious as Baltic salmon 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.

Together with environmental factors, fishing mortality, substantial misreporting, low post-smolt survival and the weak reproduction of some populations continue to keep stocks down. Fisheries in open sea areas or coastal waters are more likely to pose a threat to depleted stocks than fisheries in estuaries and rivers. ICES advises that management of salmon fisheries should be based on the status of individual river stocks, and that 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, Main Basin and the Gulf of Bothnia

In this area, populations in 29 rivers are assessed according to biological and genetic conditions. Management actions started in 1997 with the IBSFC Salmon Action Plan. Since then, the total wild smolt production has increased substantially from very low levels, particularly in the north, but smolt production in the south-east shows no signs of improvement. It is important to remember, however, that this increase is mainly due to increases in 2–3 rivers, and that the situation in the southern-most rivers is unchanged or even deteriorating.

To evaluate the status of specific stocks, ICES uses the smolt production in 2013 relative to projected natural smolt production capacity on a river-by-river basis. The target for rebuilding stocks is to reach at least 75 per cent[9] of the estimated potential smolt production for each river. As an interim objective for weak stocks, 50 per cent of the potential smolt production is used. Out of 29 stocks assessed, only two of the northern-most rivers show a high probability of reaching the 75 per cent target in the near future, while ICES states that Emån, Simojoki, Rickleån and Öreälven are the least likely to reach it.

According to ICES, salmon stocks in the rivers Rickleån and Öreälven in the Gulf of Bothnia, Emån in southern Sweden, and in several rivers in the south-eastern Main Basin are especially weak and need longer-term, stock-specific rebuilding measures. The offshore fishery in the Main Basin catches individuals from all the weak salmon stocks on their feeding migration. In order to enable a potential recovery of weak stocks, further decreases in exploitation are required along their feeding and spawning migration routes at sea.

The overall perception of this stock has not changed much since last year. There does, however, seem to be some uncertainly regarding how to interpret the fishing mortality target proposed by the Commission in the management plan (COM(2011)470), and whether it includes the total catch at sea or just the commercial catch. Misreporting of salmon as seatrout (13 000 salmon), particularly in the Polish fishery, as well as

[9]In the HELCOM Baltic Sea Action Plan, the target is 80 % of potential smolt production.

unreported catches (12 000 salmon), continues to be a problem – it is estimated to 22 per cent in total – and affects the certainty of the assessments.

The ICES advice for 2015 is a total commercial catch at sea of less than 116 000 individuals. This would imply a total catch of 180 000 individuals, when adding recreational catches at sea (17 000 salmon) and river-based catches (47 000 salmon).

In its proposal, ICES is applying the estimated catch proportions from 2013: 89 per cent "wanted catch", consisting of 68 per cent reported, 10 per cent unreported and 11 per cent misreported catches, and 11 per cent "unwanted catch" (discards), consisting of 3 per cent undersized individuals and 8 per cent seal damaged salmon. This makes the advice complex and difficult to understand.

The Commission proposal for 2015 is a total catch of 97 911 individuals – an 8 per cent decrease compared to 2014.

For salmon in the Main Basin and the Gulf of Bothnia, we call on Ministers to recommend a total commercial catch at sea for 2015 of no more than 82 000 individuals (based on the reported catch for 2013 + 3 000 undersized individuals discarded). This is due to the proposed exemption of seal-damaged fish in the discard ban plan agreed by BALTFISH, and the fact that implementation of the new CFP (including the landing obligation) in no way guarantees that the substantial unreported and misreported catches will decrease or disappear.

We also strongly recommend that the ICES advice that "fisheries on mixed salmon stocks present particular threats to weak stocks; fisheries in open seas are more likely to pose a threat; and that effort on such fisheries should be reduced" is followed. Finally, we emphasise the need for long term stock-specific rebuilding measures, including habitat restoration and removal of physical barriers in rivers and fisheries restrictions for weaker stocks in estuaries and rivers.

Salmon in Subdivision 32, the Gulf of Finland

This area contains a few small, wild populations together with a few rivers with mixed stocks (consisting of both reared and wild salmon). The wild salmon populations are genetically distinct from each other, which indicate that these still are original salmon stocks, meaning that they have not been mixed with reared salmon.

In light of the MSY objective, wild salmon populations in the Gulf of Finland are well below the 75 per cent potential smolt production target and generally not showing signs of recovery. Very little data on wild smolt production is available for the assessment, consisting mainly of limited electrofishing surveys. The ICES advice is therefore based on precautionary considerations rather than the MSY approach, and states that the fishing effort should not increase.

According to ICES, a reduction in the TAC would most likely not safeguard wild populations from exploitation. Instead, the advice is to develop more specific harvesting methods, like selective gears in specific areas, significantly reducing the risk of catching wild salmon. Information about the amounts of wild salmon caught in the mixed-stock

fisheries is limited. Information about the extent of recreational fisheries targeting salmon is also limited.

Assuming a similar amount of restocking to previous years, the ICES advice is a total commercial sea catch of no more than 11 800 salmon. This is based on the estimated catch proportions from 2013: 89 per cent "wanted catch", of which 8 per cent is estimated as unreported, and 11 per cent "unwanted catch" (discards), consisting of 2,6 per cent undersized individuals, 6 per cent seal damaged salmon and 2,4 per cent salmon "damaged for other reasons".

The Commission proposes a TAC for 2015 of 10 034 individual salmon – a decrease of 23 per cent.

For the Gulf of Finland, we call on Ministers to recommend a total commercial sea catch of less than 9 864 individuals for 2015, including the 81 per cent reported wanted catch and the current 2,6 per cent discard of undersized fish ("unwanted catch") .

There should be no commercial fisheries on wild salmon and subsequently all salmon caught in the Gulf of Finland that retains its adipose fin should be released. This should be possible even with the discard ban because of the exemption for trap-nets.

SEA TROUT

The Baltic Sea region contains approximately 1 000 sea trout stocks (*Salmo trutta*), which can be found in 881 rivers, and 471 of those stocks are thought to be wild. The status of the stocks varies considerably, as does the quality of their habitats in the rivers.

Sea trout is caught in rivers, coastal areas and the open sea. It does not migrate as extensively as salmon, but longer migrations do occur, and the main fishery is in fact in the Main basin. Catches of sea trout in the Main basin have been fluctuating from around 1 000 tonnes in 2002 to 212 tonnes last year.

The majority of the catches contain mixed stocks, which is potentially problematic for the weaker stocks. Discards of undersized sea trout take place mainly in the coastal fisheries, particularly in the gillnet fishery, but there are no clear estimates available for any fisheries. There are also strong indications that significant amounts of salmon are still misreported as sea trout.

There is no TAC set for sea trout, but national regulations include *inter alia* minimum landing size, local and seasonal closures, and minimum mesh sizes for the gillnet fishery.

Due to the widespread misreporting of salmon as sea trout, as well as the lack of uniform management of this species in the region, we ask Ministers to consider joint management of Baltic salmon and sea trout under a future multiannual management plan.

FLATFISHES

Five flatfish species are found in the Baltic Sea: Baltic flounder (*Platichthys flesus*), turbot (*Scophthalmus maximus*), brill (*Scophthalmus rhombus*), plaice (*Pleuronectes platessa*) and dab (*Limanda limanda*). Fishing for these species is mostly for human consumption, although a large part of the flatfish caught in the Baltic today is bycatch in the demersal trawl fishery for cod, of which a substantial part is discarded. There are currently no management plans for either of these species, and the knowledge concerning most stocks is poor. However, progress has been made in recent years in assessing data poor stocks and we welcome ICES's recent work to create better data on these species, especially on the different Baltic flounder stocks.

Plaice

Plaice is the only flatfish species in the Baltic Sea subject to EU quota management. It has a limited distribution in the Baltic Sea, mainly confined by their tolerance of low salinity. Plaice is common in the western parts and extends eastwards to the Gulf of Gdansk and northwards to the Gotland area; it is sporadically found farther north. There are at least two plaice populations in the region.

According to the annual scientific trawl survey (BITS), in which the catch per unit of effort (CPUE) of individuals larger than 15 cm is considered, the plaice stocks appear to be increasing strongly.

Since 2012, the ICES advice is divided into a western stock (SD 21–23) and an eastern stock (SD 24–32). ICES categorises both stock as data-limited, which limits quota increases to 20 per cent. Both stocks are subject to high levels of discarding in other fisheries, and this has been considered in the ICES advice ("wanted" and "unwanted" catches).

Because of the strongly increasing population trends, the ICES advice for plaice for 2015 is that "wanted catches" in SD 21–23 should be no more than 2 626 tonnes and "wanted catches" in SD 24–32 of no more than 886 tonnes.

The TAC proposed by the Commission for 2015 is 3 249 tonnes – a decrease of 5 per cent – which is in line with its "data limited approach" and the scientific advice. N.B. this species will not be included in the landing obligation until 2017 at the earliest, so this is a total of the "wanted catch" for the management area.

We urge Ministers to support the Commission proposal for plaice.