



Setting sustainable Baltic Sea fishing opportunities for 2018

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Introduction

Setting appropriate fishing limits is fundamental to achieving the objective of the Common Fisheries Policy (CFP) to end overfishing and to restore and maintain all fish stocks above levels capable of producing the maximum sustainable yield (MSY). More specifically, Article 2.2 of the CFP requires that: *“In order to achieve the objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing the 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”*.

In October, EU fisheries ministers are scheduled to agree on fishing opportunities in the Baltic Sea for 2018. Nearly three years have passed since the 2015 MSY deadline and not all stocks are being exploited at or below MSY exploitation rates as required by CFP, with the 2020 deadline approaching. This is also the second year that certain fishing limits will be decided within the framework of the agreed Baltic Sea multi-annual plan (MAP). Ministers should recall that the CFP only allows the postponing of the 2015 MSY deadline in exceptional cases, when meeting it *“would seriously jeopardise the social and economic sustainability of the fishing fleets involved”* (Recital 7). It is high time for ministers to set catch limits in line with the scientific advice and the rules of the Baltic Sea MAP. Taking action now will allow depleted fish stocks to recover for the benefit of fishers, coastal communities and the environment.

The following sections present an overview of scientific advice on catch limits for Baltic Sea stocks and Pew’s recommendations to the European Commission and Fisheries Ministers when proposing and agreeing fishing opportunities for the Baltic Sea in 2018. More detailed recommendations on Total Allowable Catches (TACs) can be found at the end of the document.

ICES stock advice for implementing the CFP and the Baltic Sea MAP

The International Council for the Exploration of the Sea (ICES) published its scientific advice on catch limits in the Baltic Sea for 2018 at the end of May 2017¹. According to the ICES advice, only three out of the eight stocks in the Baltic Sea with MSY advice are being harvested at or below MSY exploitation rates. Five of those stocks are being overfished. It is worth noting that two of those stocks: herring in subdivisions 20-24 (spring spawners) and western Baltic cod (subdivisions 22-24), have a stock biomass below the MSY B_{trigger} reference point.

¹ [ICES webpage](#)

Where possible, ICES provides advice on catch limits corresponding to the F_{MSY} ranges available to decision-makers from Annex I of the Baltic Sea MAP². The maximum catch limits and need for any remedial measures to recover stocks depend on the status of the stock in relation to the biomass conservation reference points in Annex II of the Baltic Sea MAP.

In 2017 the advice for two herring stocks in the Bothnian Sea (ICES subdivision 30) and Bothnian Bay (ICES subdivision 31) was merged by ICES into one piece of advice covering both stocks (Gulf of Bothnia herring). Whilst Annex I and Annex II of the Baltic Sea MAP cater for two separate stocks of herring for the Bothnian Sea and Bothnian Bay, it does not make provision for F_{MSY} ranges and biomass conservation reference points for a singular Gulf of Bothnia herring stock (ICES subdivisions 30 and 31). The single TAC for this stock should therefore be set not exceeding the F_{MSY} point value, as ICES advises.

Both Baltic cod stocks continue to give cause for concern. Last year, the agreed fishing opportunities for both stocks far exceeded the scientific advice. This year's advice for both stocks is clearer and more detailed regarding elements such as the impact of recreational fisheries and the mixing of the eastern and western stock in subdivision 24. ICES estimate that western Baltic cod stock biomass is well below the B_{lim} reference point in 2017 and is likely to be just above B_{lim} in 2018. This depends on predictions of a good recruitment, estimates that are highly uncertain. It also assumes that commercial and recreational catch limits and conservation measures in 2017 are fully effective in reducing fishing pressure as predicted. Pew recommends significant caution in setting fishing opportunities for this vulnerable stock in 2018. Fishing limits should be set well below the maximum levels indicated in the scientific advice, to safeguard the expected good recruitment and place the stock on a clear path of recovery to levels above those capable of producing MSY.

Fishing opportunities for 2018

Regarding the proposal on fishing opportunities for 2018, we ask the Commission to:

- Propose Baltic Sea TACs in accordance with CFP (Article 2.2) and Baltic Sea MAP (Article 3) requirements and objectives.
- Not exceed scientifically advised catch levels in its proposal for Baltic Sea TACs.
- Make all of its proposals public in a timely manner³.
- Exert significant caution when proposing the TAC for western Baltic cod (subdivisions 22-24). **Continue with remedial conservation measures and consider a TAC significantly lower than the maximum ICES catch advice for the management area in 2018.**
- Consider remedial measures and/or a lower fishing mortality level when proposing the TAC for western Baltic herring (subdivisions 22-24). Noting that the stock biomass is below MSY $B_{trigger}$ and action is required to recover the stock to above levels capable of producing MSY.
- Propose separate TACs for Baltic Sea plaice in subdivisions 21-23 and subdivisions 24-32, to ensure the stocks are managed sustainably and in line with the precautionary approach.

² [REGULATION \(EU\) 2016/1139 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation \(EC\) No 2187/2005 and repealing Council Regulation \(EC\) No 1098/2007](#)

³ Last year several proposals, including those for the Baltic cod stocks, were issued as non-papers which were not immediately made available in the public domain.

- Make information publicly available on what it considers to be the best available scientific advice in tonnes (or numbers of individuals e.g. salmon) for each TAC it proposes fishing limits for, to allow a better understanding of how scientific advice matches with the TACs proposed⁴. For example, it is often not clear how the Commission arrives at a TAC proposal for salmon.
- Make publicly available any scientific evidence used to justify the use of Article 4.4 of the Baltic Sea MAP, or supporting the exceptions outlined in Recital 7 of the CFP.

With respect to the Council of Ministers decisions, we:

- Ask ministers to decide on TACs in line with CFP (Article 2.2) and Baltic Sea MAP (Article 3) requirements and objectives.
- Urge ministers to set TACs which do not exceed scientific advice for all stocks.
- Welcome continued commitment from fisheries ministers to set the 2018 TAC for sprat not exceeding F_{MSY} ⁵.
- Urge ministers to recognise the continued serious situation of western Baltic cod (which has been subject to overfishing for several years and was again set above ICES advice in 2017) and to **continue with remedial conservation measures, including a TAC significantly lower than the maximum ICES catch advice for the management area in 2018**. In line with the agreed Baltic Sea MAP (Article 5.2), remedial measures must be taken, which should include continued conservation measures and setting fishing opportunities below the fishing mortality range set out in Annex I (Column B) of the MAP, to ensure the rapid return of the stock concerned to above the level capable of producing MSY.
- Highlight that the herring in subdivision 20-24 stock biomass is below $MSY B_{trigger}$ and urge ministers to agree on remedial measures in line with Article 5.2 of the Baltic Sea MAP, which could include additional conservation measures and setting fishing opportunities below the fishing mortality range set out in Annex I (Column B) of the MAP.
- Note that ICES provides advice on maximum catches. To avoid large fluctuations between consecutive years ministers could limit the variation of fishing opportunities for central Baltic Sea herring in 2018 to +20% in line with Article 4.4c of the Baltic Sea MAP.
- Request, in case ministers want to make use of the F ranges listed in Annex I (Column B) of the agreed Baltic MAP (F_{MSY} point value – F_{MSY} upper) despite the well understood negative economic, social and environmental consequences, that scientific evidence be provided and published to demonstrate:
 - That all stocks under the TAC concerned are above the conservation reference point; ($MSY B_{trigger}$); and
 - That the criteria for one of the exceptions provided for in the Baltic MAP Article 4.4 are met. Such evidence should be submitted to the European Commission before the negotiations on Baltic fishing limits, reviewed by the Scientific, Technical and Economic Committee for Fisheries (STECF) and made public.

⁴ In particular, the following information should be provided for each proposed TAC: 1) TAC zone; 2) Stocks covered; 3) All scientific advice used to calculate the TAC proposal; and 4) Information on matching scientific advice with proposed TAC units (information on how area mismatches have been addressed, what amount has been deducted for third country shares, how catch limits take account of the landing obligation etc.).

⁵ Proposal for a Council Regulation fixing for 2016 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea – [Statements \(13404/15\)](#).

- Call on Ministers to live-stream their first exchange of views on the Commission's proposal for fishing limits in line with 2009/937/EU Article 8 to enhance transparency, contribute to good governance and increase citizens trust in EU decision making⁶.

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⁶ See also [joint NGO letter to the Estonian presidency](#).

Detailed TAC recommendation in tonnes / individuals for salmon (*approximate values)

Name	TACs ⁱ			ICES ADVICE			CALCULATED CATCH OPTIONS USING OTHER REFERENCE POINTS				Baltic MAP Safeguards Art. 5.2&3	Pew recommendation
	2015 TAC	2016 TAC	2017 TAC	Advice on stock & exploitation status	Advice for 2018 catches ⁱⁱ	Variation from 2017 TAC	F _{MSY}	MSY F _{Lower} MAP Art. 4.2&3 ⁱⁱⁱ	MSY F _{Upper} MAP Art. 4.4a ^{iv}	20% Variation MAP Art. 4.4c ^v		
Gulf of Bothnia herring (30-31) ^{vi}	158,470	120,872	140,998	F > F _{MSY} B > MSY B _{trigger}	95,566	-32%	95,566	F-Ranges not defined in Baltic MAP			NA	≤95,566
Western Baltic herring (22-24)	22,220	26,274	28,401	F > F _{MSY} B < MSY B _{trigger}	17,309 ^{vii}	-39%	17,309	12,987	NA ^{viii}	NA ^{ix}	Plus measures to ensure B > B _{MSY} ^x	<17,309
Central Baltic herring (25-27, 28.2, 29 and 32)	163,451	177,505	191,129	F < F _{MSY} B > MSY B _{trigger}	238,229 ^{xi}	+25%	238,229	177,134 ^{xii}	295,937 ^{xiii}	229,355	NA	≤238,229
Gulf of Riga herring (28.1)	38,780	34,915	31,074	F > F _{MSY} B > MSY B _{trigger}	28,999 ^{xiv}	-7%	28,999	23,476 ^{xv}	33,275 ^{xvi}	-	NA	≤28,999
Eastern Baltic cod (25-32)	51,429	41,143	30,857	F > F _{MSY proxy} B > MSY B _{trigger proxy}	22,242 ^{xvii}	-28%	-	F-Ranges not defined in Baltic MAP			NA	≤22,242
Western Baltic cod (22-24)	15,900	12,720	5,597	F > F _{MSY} B < B _{lim} (2017) B > B _{lim} (2018) B < MSY B _{trigger}	6,066 ^{xviii}	+8%	6,066	2,357 ^{xix}	NA ^{xx}	NA ^{xxi}	Plus measures to ensure B > B _{MSY} ^{xxii}	<6,066
Baltic sprat (22-32)	213,581	202,320	260,993	F < F _{MSY} B > MSY B _{trigger}	262,310 ^{xxiii}	+1%	262,310	197,061	271,308	-	NA	≤262,310
Baltic plaice (22-32) ^{xxiv}	3,409	4,034	7,862	Plaice (Sub. 21-23): F < F _{MSY} B > MSY B _{trigger} Plaice (Sub. 24-32): Undefined	6,272	-20%	6,272	F-Ranges not defined in Baltic MAP			NA	≤6,272
Salmon (22-31)	95,928	95,928	95,928		87,116 ^{xxv}	-9%	-	Not covered Baltic MAP			NA	≤87,116
Salmon (32)	13,106	13,106	10,485		10,349 ^{xxvi}	-1%	-	Not covered Baltic MAP			NA	≤10,349

Footnotes

- ⁱ Green font = did not exceed scientific advice, Red font = exceeded scientific advice.
- ⁱⁱ Based on EU MAP (F_{MSY} plus Advice Rule), ICES MSY approach (F_{MSY} plus Advice Rule) or ICES precautionary approach.
- ⁱⁱⁱ Baltic MAP stipulates that fishing opportunities shall comply with the target fishing mortality ranges F_{MSY} lower to F_{MSY} (Art. 4.2), or lower (Art. 4.3).
- ^{iv} Despite negative socio-economic and environmental effects, the Baltic MAP (Art. 4.4a) allows fishing up to MSY F_{Upper} , provided that the stock is above MSY $B_{trigger}$ and “if, on the basis of scientific advice or evidence, it is necessary for the achievement of the objectives laid down in Article 3 in the case of mixed fisheries, or if it is necessary to avoid serious harm to a stock caused by intra- or inter-species stock dynamics.”
- ^v The Baltic MAP (Art. 4.4c) allows fishing up to MSY F_{Upper} , provided that the stock is above MSY $B_{trigger}$ “in order to limit variations in fishing opportunities between consecutive years to not more than 20%.”
- ^{vi} In 2017 the two herring stocks in ICES subdivisions 30 (Bothnian Sea) and 31 (Bothnian Bay) were merged into one stock (Gulf of Bothnia) during ICES benchmarking. Previously, The TAC was calculated by summing the ICES advice for subdivisions 30 and 31. The EU multiannual plan (MAP) still formally covers Gulf of Bothnia herring as two stocks. The combined stock of herring in subdivisions 30 and 31 is not currently specified in the plan. Catches associated with a new F_{lower} and F_{upper} are calculated by ICES but are not specified in the plan.
- ^{vii} An EU Baltic Sea Multiannual Plan (MAP; EU, 2016) was established in 2016 and applies to herring in subdivisions 22–24, which is part of the distribution area of the WBSS stock. The MAP is not adopted by Norway and, thus, not used as basis of the advice for this shared stock.
- ^{viii} Not applicable because stock is below MSY $B_{trigger}$.
- ^{ix} Not applicable because stock is below MSY $B_{trigger}$.
- ^x The Baltic MAP specifies that if $SSB < MSY B_{trigger}$ further remedial measures shall be taken to ensure rapid return of the stock to levels above the level capable of producing MSY. To achieve such levels, fishing opportunities for the stock concerned shall be fixed at a level consistent with a fishing mortality that is reduced below the range set out in Annex I, column B, to the Regulation, taking into account the decrease in biomass of that stock.
- ^{xi} 9.5% Russian share deducted from overall ICES advice (based on historical % share values). TAC = $267,745 * 0.905 + 260$ (Gulf of Riga herring assumed to be taken in Subdivision 28.2) - 4,340 (Central Baltic herring assumed to be taken in the Gulf of Riga).
- ^{xii} 9.5% Russian share deducted from overall ICES advice (based on historical % share values). TAC = $200,236 * 0.905 + 260$ (Gulf of Riga herring assumed to be taken in Subdivision 28.2) - 4,340 (Central Baltic herring assumed to be taken in the Gulf of Riga).
- ^{xiii} 9.5% Russian share deducted from overall ICES advice (based on historical % share values). TAC = $331,510 * 0.905 + 260$ (Gulf of Riga herring assumed to be taken in Subdivision 28.2) - 4,340 (Central Baltic herring assumed to be taken in the Gulf of Riga).
- ^{xiv} TAC = $24,919 - 260$ (Gulf of Riga herring assumed to be taken in Subdivision 28.2) + 4,340 (Central Baltic herring assumed to be taken in the Gulf of Riga).
- ^{xv} TAC = $19,396 - 260$ (Gulf of Riga herring assumed to be taken in Subdivision 28.2) + 4,340 (Central Baltic herring assumed to be taken in the Gulf of Riga).
- ^{xvi} TAC = $29,195 - 260$ (Gulf of Riga herring assumed to be taken in Subdivision 28.2) + 4,340 (Central Baltic herring assumed to be taken in the Gulf of Riga).
- ^{xvii} 5% Russian share deducted from overall ICES advice. Percentage value based on communications with EC and Polish Ministry of Maritime Economy and Inland Waterways.
- ^{xviii} Western Baltic cod caught in SD22-24 (3,541 tonnes) + Eastern Baltic cod caught in SD 24 (2,525 tonnes) based on Ratio EB cod / WB cod in SD 24. In addition, ICES assume recreational catches 1,754 tonnes not included in the SD 22-24 TAC (Commercial + Recreational catch is estimated at 7,820 tonnes in SD22-24 for 2018).
- ^{xix} Western Baltic cod caught in SD22-24 (1,376 tonnes) + Eastern Baltic cod caught in SD 24 (981 tonnes) based on Ratio EB cod / WB cod in SD 24. In addition, ICES assume recreational catches 1,754 tonnes not included in the SD 22-24 TAC (Commercial + Recreational catch is estimated at 4,111 tonnes in SD22-24 for 2018).
- ^{xx} Not applicable because stock is below MSY $B_{trigger}$.
- ^{xxi} Not applicable because stock is below MSY $B_{trigger}$.
- ^{xxii} The Baltic MAP specifies that if $SSB < MSY B_{trigger}$ further remedial measures shall be taken to ensure rapid return of the stock to levels above the level capable of producing MSY. To achieve such levels, fishing opportunities for the stock concerned shall be fixed at a level consistent with a fishing mortality that is reduced below the range set out in Annex I, column B, to the Regulation, taking into account the decrease in biomass of that stock.
- ^{xxiii} 10.08% Russian share deducted from overall ICES advice. Percentage value based on 2009 TACs sharing agreement between EU and Russia.
- ^{xxiv} ICES does not provide advice for a TAC covering both stocks. The TAC is presently calculated using different ICES advices, which results in a non-precautionary TAC. For more info see ICES Baltic Sea plaice TAC calculation table: <http://ices.dk/sites/pub/Publication%20Reports/Advice/2017/2017/ple.27.21-23.pdf> (p. 4). Pew asks for separate TACs for each stock.
- ^{xxv} In accordance with ICES information on IUU fisheries 7% of unreported salmon catch and 16% of misreported salmon catch was also deducted from overall ICES advice. 1.9% Russian share deducted from overall ICES advice. Percentage value based on 2009 TACs sharing agreement between EU and Russia.
- ^{xxvi} In accordance with ICES information on IUU fisheries 3% of unreported salmon catch was also deducted from overall ICES advice. 9.3% Russian share deducted from overall ICES advice. Percentage value based on 2009 TACs sharing agreement between EU and Russia.