

8 October 2015

To: The Fisheries Ministers of the EU Member States

**Re: Baltic TACs at the EU Fisheries Council Meeting, 22 October 2015**

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 2016, COM (2015) 413. We ask you to endorse them 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 scientific advice and EU commitments.

The decision on the Baltic Sea TACs is an opportunity for you to firmly support the agreed CFP management objectives. We emphasise the need to set fishing opportunities **below** the exploitation level that corresponds with maximum sustainable yield ( $F_{MSY}$ ) by 2015, where possible, and by 2020 at the latest in order to restore and maintain fish stocks above levels capable of producing maximum sustainable yield as required by the CFP.

Here are our recommendations:

- The **Western Baltic cod** stock is severely overfished, and continued overfishing is substantial. Recreational fishing is a significant part of the overall catch. We remind you of your commitment<sup>1</sup> to reach  $F_{MSY}$  of 0.26 by 2016. However, given the critically low state of the stock,  $F_{MSY}$  alone is not precautionary. The TAC should be set below  $F_{MSY}$  and additionally reduced to account for recreational catch. We therefore urge you to set a TAC of no more than 5 239 tonnes, which corresponds to ICES advice after accounting for recreational catch.
- In addition, for the **Western Baltic Cod** stock, we remind you of your commitment to protect locally spawning cod in subdivision 22. In line with this commitment, we recommend the creation of a sub-TAC for subdivisions 22-23 which should not exceed 65% of the overall area TAC, or 3 405 tonnes.
- The **Eastern Baltic cod** stock is in a data limited situation for the second year in a row, showing a relative decrease in biomass and increase in exploitation rate. Therefore ICES advises a precautionary approach. Last year the Council approved a TAC which was significantly above ICES advice and hence agreed to overfish this already weak stock. The Commission proposal, although a 20% reduction from the current TAC, remains significantly above ICES advice. We call on you to support ICES advice corresponding to a TAC not exceeding 29 200 tonnes, which is particularly important for this vulnerable stock.
- For stocks of **Sprat, Plaice, and Central Baltic and Gulf of Bothnia herring**, we call on you to support the Commission's proposal, which is in line with scientific advice.
- Due to differences in the **Bothnian Bay and Bothnian Sea herring** stocks, we further recommend separating the management area to better represent stock structure.

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<sup>1</sup> 2014 Presidency Compromise (14275/14)

- For the **Gulf of Riga herring** stock we recommend a modest decrease in the TAC of 15 %, resulting in 32 963 tonnes. Given the relatively good state of the stock and industry's effort to reduce the exploitation rate below  $F_{MSY}$ , this recommendation is a compromise with industry in the Baltic Sea Advisory Council.
- For the **Western Spring Spawning herring** stock we recommend the continued application of the IIIa TAC-setting procedure, resulting in a 50:50 split between management areas of the ICES advised total catch, which brings the Western Baltic herring TAC to 26 274 tonnes.
- Salmon stocks remain depressed over most of the Baltic. For **Central Baltic salmon**, we recommend a TAC of 89 300 individual fish. This is in line with scientific advice, incorporating 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 recommend a TAC of no more than 10 024 individual reared salmon, and zero catch of wild salmon. The Commission's proposal is numerically in line with ICES advice, but omitted to specify only reared salmon should be caught.

We note with concern that Council has consistently decided on TACs exceeding scientific advice, with a sharp increase from 2012 to 2014. Unless this trend is reversed, progress towards the objective of healthy and abundant stocks will be seriously hampered.

In conclusion, we urge you to stand firm and implement the objectives of the CFP by following scientific advice and setting sustainable fishing limits for 2016 that will restore and maintain fish populations above biomass levels capable of producing MSY.

**The attached annex provides more detail and our rationale for the recommended TACs.**

Yours sincerely,



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