

29 September 2016

To: The Fisheries Ministers of the EU Member States

**Re: Baltic TACs at the EU Fisheries Council Meeting, 10-11 October 2016**

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 2017, COM (2016) 545. 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 the first opportunity for you to firmly support the agreed management objectives of the Baltic Sea multi species and multi annual fisheries management plan (2016/1139). We emphasise the need to set fishing opportunities **below** the exploitation level that corresponds with maximum sustainable yield ( $F_{MSY}$ ) in order to restore and maintain fish stocks above levels capable of producing maximum sustainable yield as required by the CFP.

One of the objectives of the Common Fisheries Policy is to "promote coastal fishing activities, taking into account socio-economic aspects" (CFP article 2.5.i). Especially the more vulnerable small-scale coastal fisheries feel the pressure of necessary cod quota reductions and the generally bad shape of Baltic Sea cod stocks. We therefore urge Member States to apply article 17 of the CFP when distributing 2017 quota to their fishermen, and in particular to prioritise fishing opportunities for fishing vessels deploying selective fishing gear or using fishing techniques with reduced environmental impact.

Our main recommendations regarding Baltic Sea TACs are as follows:

- For stocks of **Sprat, Plaice, Eastern Baltic Cod, Central Baltic herring, Gulf of Riga Herring and the Western Spring Spawning herring** we call on you to support the Commission's proposal, which is in line with scientific advice and the Baltic multiannual plan.
- The **Eastern Baltic cod** stock shows little change from previous years. Adhering to scientific advice is particularly important for this vulnerable stock, especially given that the length at which the juveniles reach sexual maturity (L50) in this stock is roughly 20 centimetres, the lowest in the recorded time series. This alone is an indicator of an extremely stressed stock, and coupled with additional data it is clear that this stock is in peril. In setting the TAC all Russian catches must be reflected in the EU quota.
- The **Western Baltic cod** stock is severely overfished, and continued overfishing is substantial. Reproduction is now clearly impaired and the biomass is below the critical limit value. The CFP and Baltic Multiannual plan were designed specifically to avoid the risk of recruitment failure, yet this has occurred after our repeated warnings. We therefore urge you to set a TAC of no more than 917 tonnes, which corresponds to Recital 13 and Article 5 of the Baltic multiannual plan.
- Salmon stocks remain diminished in 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 call on you to support the Commission's proposal with zero catch of wild salmon. The Commission's proposal for a TAC totalling no more than 9 403 salmon is numerically in line with ICES advice, but omitted specifying that only reared salmon should be caught.

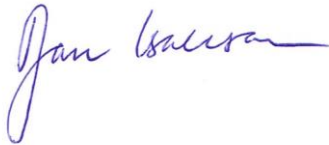
In addition to our TAC recommendations we also urge ministers to:

- Enforce the landing obligation. Observer data indicates that **one of four cod** caught in the eastern Baltic Cod stock is still being thrown overboard dead or dying.
- Separate the Bothnian Bay and Sea herring management area into the **Bothnian Bay and Bothnian Sea herring** stocks, to better represent the differences in the stocks .

In conclusion, we urge you to stand firm and implement the objectives of the Baltic multiannual plan by following scientific advice and setting sustainable fishing limits for 2017.

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

Yours sincerely,



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Director  
Fisheries Secretariat (FishSec)



Dr. Monica Verbeek  
Executive Director  
Seas At Risk (SAR)