

Coalition Clean Baltic

25 June 2010

Coalition Clean Baltic (CCB) recommendations and comments on the ICES advice for the Baltic Sea 2011

CCB is a member of the Baltic Sea RAC but was not able to attend the meeting where the fishing opportunities and the ICES advice for 2011 were discussed. Because of that, CCB comments to the Baltic Sea RAC position paper are not accepted after the meeting. Therefore CCB feel obliged to write this separate statement to the Commission.

ICES advice 2011

CCB has been a strong advocate for supporting the scientific advice all the way up to the actual TAC decision in the Council and the consequent fishing effort and reported landings. It is now clear that the cod management plan and the TAC set according to the scientific advice have given results and that this example should be followed for all commercial species. In general CCB wants to point out that all TACs should make sure to include the expected Russian catches.

Cod

We are very happy to note that the recoveries of the stocks are continuing, although the western SSB is still struggling to move away from the Bpa level. The last years we have seen a Commission proposal and decision in the Council in line with the scientific advice for the first time. To follow the advice and the management plan has proven successful indeed and CCB supports the continued use of this management plan.

- **TAC should be set at 18 800 t. for the western stock and 64 400 t. for the eastern stock**

ICES list several uncertainties in the advice. Unreported fishing, discarding figures are unclear and fish taken by the recreational fishermen are still unknown. This must change and correct data must be collected and made available to science. Large catches in recreational angling cannot continue to go unreported, and this is especially important when fish is taken from the weaker western cod stock.

CCB wants to underline the need for a strong control of the fisheries the coming years since the stocks are improving and the temptation to overfish might increase.

Salmon

The salmon catches have dropped during a few years before 2008 but now an increase of catches in 2009 is reported. The use of long lines is increasing and the fishery at sea on mixed stocks continues.

For salmon, the scientific TAC advice and the politically set TAC are not matched at all. In fact they are by far the furthest apart of all commercially exploited species in the Baltic that has a TAC. Last year the set total salmon TAC overshoot the advice with 132%! (ICES total area 22-32 = 133' agreed TAC in area 22-32 = 309')

We are still waiting for the salmon management plan. We hope that the plan will champion the scientific advice for the Baltic salmon stocks to reverse the above mentioned situation with a TAC set far from the limits needed for a recovery. We also want the Commission to acknowledge problems of miss reporting and illegal catching of undersized salmon reported as Sea trout.

The post-smolt survival rates are still very low and all the facts of the case are not yet available. However there are clear indications that the farmed salmon have an extremely low survival rate. We hope the management plan include a timeline for phasing out the large scale restocking of salmon in the Baltic and that the fisheries must adapt to a world without this costly, inefficient and from a genetic point of view, unwanted activity. Efforts and money should be aimed at increasing the reproductive capacity of the rivers.

- We support ICES in the ambitions to lower the **TAC to 120 000 in the main basin (area 22-31)** and to keep the **catches for Gulf of Finland at present level and not allow any increases.**
- ICES is clear in saying that the **fishing should be concentrated to coastal areas and estuaries** where better control of which stock is being exploited is possible. CCB strongly supports this and call for a **stop of the mixed fisheries**

CCB are concerned about the situation in the Gulf of Finland. ICES continue to say that the data is so poor that TAC advice and modeling is impossible. All efforts must be made to remedy this and not only in the Gulf of Finland. Migration patterns and the feeding migration across the Baltic for salmon must be better studied to know more about where and when to close and open the fishing.

The final TAC consideration must make sure to include the catches in recreational fishing. ICES report that catches last year has increased to over 18 000 individuals (ca 3000 via rec. fishing) in the Gulf of Finland when including recreational fishing.

CCB also feels that ICES not strongly enough emphasize the need to protect the wild salmon in the Russian river Luga. This salmon has been genetically tested in Finland to be a distinct wild salmon and different from the restocked salmon in Finland and Russia originating mostly from the Neva salmon. Russian scientist estimate that about 500 wild individuals spawn each year in the Luga. The fishing at sea must be very strict and there can be no catch of wild salmon of Estonian river or from the Luga River.

Herring

Before the new long term management plan is introduced, CCB support the ICES advice to move towards the MSY approach and PA is supported by CCB.

- **CCB support the ICES advice to decrease the TAC for Central herring according to MSY approach or PA approach to 95 000 tonnes (25-29 plus the Gulf of Finland)**

- **CCB support the ICES MSY transition/PA advice to decrease the TAC in Gulf of Riga to 33 100 tonnes**
- **CCB will also support the ICES advice to raise the TAC for the Bothnian Sea (area 30) to 115 000 tonnes according to PA advice (no MSY available)**

CCB is concerned about the reports on a mixed fishing on sprat and herring giving uncertainty to the landings and reporting of the actual species caught. This fact alone supports the lowering of the TACs and a more targeted control of the herring/sprat fleet 2011 seems appropriate.

CCB also want to point out that the situation remains unknown for the Bothnian Bay stocks and this is unsatisfactory.

Sprat

This large stock was last year reported to yield the biggest harvest ever. A growing cod stock competing for food with the fishermen is an unwanted situation and CCB support the ICES advice to lower the TAC. The uncertainty of data and the fact that a MSY approach is not available underlines the need to stay with the precautionary approach in this case.

- **CCB supports the ICES advice to lower the TAC to less than 242 000 tonnes.**

Flatfish

As ICES do not have data enough to give any advice at all on plaice, turbot or flounder a strict precautionary approach should be employed. Plaice is the only flatfish with a set TAC. Catches should not be allowed to increase. A decreased TAC to move towards recent landings is the best option before better data is presented.

- **CCB recommends a TAC to be set at less than 2 500 tonnes (catch 2009 2 235 tonnes)**