

10 August 2009

To
DG Mare
Directorate E - Baltic Sea, North Sea and Landlocked Member States

Ilona Jepsena
Stefanie Schmidt
Ellen Bruno

CCB proposals on fisheries control and TACs for Baltic Sea fisheries for 2010

CCB was not represented at the BS RAC Ex Com meeting 23 June 2009, Vasa, Finland, and had consequently no chance to influence the recommendations made by the BS RAC to EC on Baltic Sea fisheries for 2010.

As an Baltic NGO-actor with special interest in development of sustainable Baltic Sea fisheries we would like to provide you with our views for consideration, when developing a proposals Baltic fisheries conservation and control for 2010.

CCB views on Baltic fisheries management for 2010 are expressed in the Annex, attached to this letter.

We also would like to comment some of the BS RAC recommendations for salmon fisheries 2010, that we cannot support.

BS RAC recommendation says:

“The BS RAC considers that the TAC for 2010 should build on the management objectives of the Salmon Action Plan, until a new management plan is adopted”.

The Salmon Action Plan for the Baltic Sea, was adopted by International Baltic Sea Fisheries Commission (IBSFC) in 1997, and has no legal status any longer, as IBSFC was closed down 2004. The management objectives for Baltic salmon for the future has been discussed within BS RAC, in connection with the development of a new EC Baltic Salmon Management Plan. The stakeholders in BS RAC have agreed for a future production capacity target of at least 75 % smolt production. From this perspective it is most appropriate for ICES, in its advice for 2010, to evaluate in relation to the 75 % smolt production level.

BS RAC recommendation says:

“The scientific foundation still seems very weak for the alleged low at-sea survival, that also forms part of the background for the advice”.

The available estimates on post-smolt survival is of utmost importance to take into account for Baltic salmon management decisions. Any uncertainties of non-reported tagging, as the basis for post-smolt

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survival estimates, should not curtail the very important scientific evaluations in trends for post-smolt survival. Insufficient scientific information cannot be an argument for high exploitation rates, the precautionary principle shall be always be applied in such cases.

*EC should require better Baltic salmon tagging data from Member States (e g from Sweden where tagging data have not been available in recent years) as such information is of most importance to monitor the post-smolt survival.

Best regards,

Gunnar Norén

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