

## Questions from the Commission's consultation paper to support development of a Baltic salmon management

**Your name: Coalition Clean Baltic, 29 April 09**

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| <b>Section 4.1.</b> | 1. General objectives of a management plan for salmon are presented in Section 4.1<br><i>Which respective importance would you give to each of these objectives below:<br/>         State if you think they are <b>very important</b> or <b>important</b> or <b>not so important</b> or <b>not important</b> or if you have <b>no opinion</b></i> |   |
|                     | Wild salmon in the Baltic Sea and its rivers shall be managed and protected within safe biological limits, safeguarding the genetic diversity of the different stocks; and contributing to the objectives for the Habitats Directive  | Very important. EC Habitats directive is valid for wild Baltic salmon, in EC Member States of the Baltic Sea Region, whether you like it or not. To safeguard the survival of all wild Baltic salmon populations, this kind of objective is of most importance.   |
|                     | Commercial and recreational fishermen in the Baltic Sea and its rivers shall be able to use the fishing possibilities resulting from a sustainable management of the Baltic salmon stocks.  | Important objective. Man shall be able to harvest the natural resource Baltic salmon, within the conservation limits of sustained stocks.   |
|                     | Science and research shall be further developed on salmon and sea trout in cooperation with the stakeholders.   | Very important. There is a great need to have more reliable information on wild Baltic salmon and sea-trout populations, to develop a true sustainable management. To reach reliable info on salmon and sea-trout various stakeholders, such as fishermen, anglers, local inhabitants, local fisheries management associations, env NGOs etc, must be involved. Financing for science, research and monitoring is today a problem for most EU MS in the Baltic Sea Region. EC should provide financial instruments to support the regional salmon studies needed for a proper management. |
|                     | The achievement of the objectives pursued should not create excessive and disproportionate administrative burdens.  | Not so important. The question is how to interpret the wording "excessive and disproportionate administrative burdens". There is a clear need for better and improved administration of the management of Baltic salmon. Better reporting of catches in all kind of fisheries (recreational angling, commercial, trolling etc). An answer of "important" on this question may be used to stop all kind of extra administrative costs, to not receive the info necessary for a sustainable management.   |

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|                | <p>2. <i>Would you suggest any additional objectives?</i></p> | <p>Yes.</p> <p>The new EC Baltic Salmon Management Plan should require MS to set up clear <b><i>Conservation Limits</i></b> (CL) for each wild salmon river, to guarantee the survival of all wild stocks and sustained populations. Such objective would follow the management principles adopted by NASCO and also by EC for the North-Atlantic salmon stocks. The most suitable way for CL is to require development of <u>objectives for the number of returning adult spawners for each wild salmon river</u>, that will guarantee the long-term survival of each population. (Such numbers must be developed individually for each salmon river, but a <u>minimum number of returning spawners should annually be 200</u> (as a 3-year average). Denmark has in 4 low-land wild salmon rivers in South-West Jutland set a goal for minimum of 1000 returning spawners).</p> <p>A new Objective on “<b><i>50 % escapement for all wild salmon on its way to the spawning areas</i></b>” should be introduced to guarantee that salmon fisheries never will harvest wild salmon to a level that would jeopardize the wild stocks.</p> <p>The reason is as follows: Alaska-USA introduced such management approach in 1924, the so called “White Act”. This regulations gives the regional authorities the power to introduce new regulations on fisheries management to reach the goal. The evaluation is that this goal has been the most important objective ever introduced for the sustainable management of the Pacific salmon in Alaska’s sea-, coastal areas, and rivers. EC should learn from such good practices for salmon management.</p> <p><b><i>No releases of salmon in rivers with naturally spawning salmon.</i></b></p> <p>Salmon research and science have clearly showed that releases of salmon in rivers with wild populations in the long-run will destroy the naturally spawning salmon population. To conserve the genetic variability, biodiversity of salmon, all releases must be stopped. In exceptional cases with wild population close to extinction supplementary releases of the genetic native populations salmon can be necessary.</p> |
| <b>Section</b> | 3a) <i>What is your opinion on having a global TAC</i>        | We understand the wording “global TAC” , as an EC salmon TAC for all   |

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| <p><b>4.2</b></p> | <p><i>including both catches from rivers and at sea?</i></p> | <p>Baltic salmon fisheries.</p> <p>A total TAC for all Baltic salmon fisheries is one important component for Baltic salmon management. We believe that ALL fisheries must be included in any TAC for Baltic salmon. Unregulated fisheries cannot be accepted. A future TAC(tot) can be set as the sum of TAC(sea) and TAC(rivers). <math>TAC(tot) = TAC(sea) + TAC(rivers)</math>. The TAC(tot) shall be in line with ICES advice for a total annual harvest of Baltic salmon, to follow the precautionary approach. As the salmon TAC for commercial fisheries today is underutilized, not reflecting the real landings, there is a possibility to allocate the “not-used TAC in commercial fisheries” for river fisheries. In such case the setting of TAC(sea) should use the existing allocation keys for Baltic EU MS, and the new TAC(rivers) could be allocated to MS in relation to existing and historical salmon river fisheries. In such case the “Homing principle” will also be applied to some extent, which means that rivers with high salmon production will be allocated bigger share of salmon fisheries. The national TAC(rivers) will be distributed on national level for different salmon rivers, but could never be as high for an individual river that it would threaten the Conservation Limits set up for each salmon river.</p> <p>The total TAC should be complemented with regulations to guarantee fulfilment of an <u>objective of 50 % escapement for all wild salmon on its way to the spawning areas</u>. Harvest control rules, for open-sea, coastal- and river fisheries must be developed by EC and Member States to guarantee the escapement goal.</p> <p>EC shall require that Member States (MS), mainly responsible for coastal and river fisheries, yearly reporting on harvest control rules in national waters, that will guarantee the objective on “50 % escapement for wild Baltic salmon”.</p> <p>It would be very strange not to include the salmon river fisheries in the salmon TAC, because the proportion of river fisheries in relation to sea fisheries can be substantial. In Torne river the salmon river annual catch is 10 – 15 000 salmon today. The total future salmon river fisheries may expand to a level of approx. 50 000 per year. In relation to the salmon sea landings, about 170 000, this corresponds to a big share of the total catch.</p> |
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|                            | <p><i>3b) If you oppose to a global TAC, state your preferred alternative options for limiting fisheries.</i></p> | <p>See comments under 3a)<br/>Besides the Total Baltic TAC, we have the following proposals for harvest control rules.</p> <p>EC shall require MS to set up a mangement schemes for all wild salmon rivers (incl. coastal- ,river-mouth and river fisheries), that will safeguard each wild salmon population, including the weakest. MS must set up clear <u>objectives for the number of returning adult spawners for each wild salmon river</u>, that will guarantee the long-term survival of each population. A <u>minimum number of returning spawners should annually be 200</u> (as a 3-year average) for wild salmon rivers. Each salmon river management plan should also include components for habitat restorartion, protection of spawning areas etc.</p> <p>Minimum number of returning spawners limits is set to guarantee a sustained salmon population. To allow for river fisheries a higher level must be set.</p> <p>In the future ICES model for Baltic salmon management the goal for the number of returning spawners to rivers should be combined with the 75-80 % production target.</p> |
| <p><b>Section 4.3.</b></p> | <p><i>4. Should the plan keep the existing technical measures and/or set up additional measures?</i></p>          | <p>The seasonal regulations for long-lining fisheries should be limited to guarantee the migration of a sufficient number of returning salmon spawners from southern Baltic proper to wild salmon rivers, which would safeguard the objectives for returning adult spawners set up for each river.</p> <p>ICES should evaluate the existing time-frames for long-lining, and propose seasonal opening and closing of such fisheries. (The consequence of such evaluation might be that the limit for late spring long-lining fisheries might be moved more towards early spring/winter).</p> <p>New regulations should also be introduced to safeguard that returning spawners have the possibility to return to its home spawning areas during the whole migration season. We propose the introduction of <u>weekly closed periods</u> for coastal, river-mouth, and river fisheries under the whole fishing season, to guarantee both early and late returning spawners. For a certain</p>  |

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|                       |  | number of days no fishing shall be allowed. Best way would probably be that such regulations would be the same for all MS, and coordinated by EC.   |
| <b>Section 4.4.</b>   | <i>5. What is your opinion on the proposed targets and timeframes?</i>   | <p>We fully support the Helcom BSAP goals, which means to reach production of wild salmon of at least 80 % of the best estimate of potential production by 2015.</p> <p>In the EC consultation paper under 4.4 is said “A smolt production target can easily be converted into a spawning stock target ....”. We cannot support the views expressed. We believe it is not easy to convert a smolt production target into a spawning stock target. To do this you need to know the smolt mortality during migration period out to the Baltic Sea, smolt mortality in coastal areas and post-smolt survival at sea. Much of these information is not available today, e g because of very poor monitoring of returning spawners, out-migration of smolts etc in many rivers. To do a reliable conversion, we need proper monitoring of returning spawners and out-migrating smolts in all wild salmon rivers.</p> |
| <b>Section 4.4.1.</b> | <i>6. What is your opinion on setting intermediate targets on weak rivers and on how should we treat these rivers?</i> | <p>It is reasonable to set intermediate targets for the weak salmon rivers. Such target for weak rivers could be 50 % of the estimated potential smolt production by year 2015. A clear time-table shall also be set for the 75-80 % production goal. All “weak rivers” shall develop Salmon River Management Plans within 1-2 years, incl. measures on proper monitoring (returning spawners, out-migrating smolts, parr densities ), habitat restoration/protection, harvest/fisheries regulations, control)</p> <p>A crucial point for this approach is that “weak rivers” have so far not been defined. Criteria of “weak rivers” should be set, and a selection process of the “weak rivers” should be started, including stakeholder participation.</p>   |

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| <b>Section 4.5.</b> | <p>7. <i>Should the plan include measures to promote fishing on reared salmon instead of wild and which measure would you regard as the most appropriate?</i></p> | <p>Yes, as long as there is very strong release programmes for reared salmon. And to protect weak wild salmon populations. The seasonal opening and other regulations of the salmon fisheries in the Gulf of Bothnia, Gulf of Finland, Gulf of Riga and Baltic Proper, should be regulated on a regional scale, preferably by EC DG Mare, to get a common regulation/protection of all wild weak Baltic salmon populations. Fishing periods should be set to safeguard objectives for returning spawners for all weak populations. (Sweden and Finland has today different time-frames for opening of coastal trap-net fisheries in the Gulf of Bothnia. Both Swedish &amp; Finnish salmon fisheries exploit e.g. the 5 weak Swedish salmon river populations in Gulf of Bothnia. Sweden's fisheries starts in June, and Finland's in April. The Finnish opening periods have recently been prolonged for 2 weeks at starting/closing seasonal periods.)</p> |
|                     | <p>8. <i>In case of a fin-clipping program, how and on what basis should the areas for mandatory release of wild salmon be identified?</i></p>                    | <p>Areas for Terminal fisheries have been identified within the IBSFC SAP. The basis for identification of such areas for terminal fisheries should be studies of presence of wild &amp; released salmon in such areas. The proportion of wild salmon should not be allowed to be more than 2-5 % of the total salmon available in such areas.</p>   |
|                     | <p>9. <i>Which other management tools would you propose to decrease fishing pressure on populations from weak rivers?</i></p>                                     | <p>The approach to reduce the fishing pressure on weak salmon populations, must be to limit the total mixed stock salmon fisheries as much as possible, and to strictly control the coastal fisheries close to river-mouth, the river-mouth and river fisheries, in rivers with weak salmon populations. The best way is probably to strictly limit and control salmon fisheries in river-mouth and neighbourhood coastal areas and river fisheries, for such river populations. EC DG Mare should develop such regulations principles to be implemented by MS.</p>  |
| <b>Section 4.6.</b> | <p>10. <i>Aside from the measures and targets proposed below, would you recommend any other measure to safeguard the genetic diversity?</i></p>                   | <p><b>No releases of salmon in rivers with naturally spawning salmon.</b> Salmon research and science have clearly showed that releases of salmon in rivers with wild populations in the long-run will destroy the naturally spawning salmon population. To conserve the genetic variability, biodiversity of salmon, all releases must be stopped. In exceptional cases with wild population close to extinction supplementary releases of the genetic native populations salmon can be necessary</p>   |

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|                       |   | To set up a clear overall objective that “All naturally spawning Baltic salmon river populations will be managed and protected within “safe biological limits” securing full reproductive possibilities and genetic variability of the species”.   |
| <b>Section 4.6.1.</b> | <i>11. What is your opinion on setting a target on minimum numbers of wild spawners per meta population unit or per river in the management plan?</i> | <u>Targets for minimum number of returning spawners must be set per river (genetic limit reference points) within a timeframe</u> , because a target minimum numbers of returning wild spawners per meta-population (proposed by ICES) can never guarantee that all wild populations within the meta-population will survive. A meta-population target can still be met, if one wild population, within the meta-population, will be extincted.  |
| <b>Section 4.6.2</b>  | <i>12. What is your opinion on the measures to limit the number of released reared salmon suggested above?</i>  | We agree fully to the views expressed to <u>immediately phase-out all voluntary releases of salmon in rivers with depleted salmon stocks</u> , to reduce the high proportion of reared and released salmon in the Baltic Sea. Extensive artificial salmon stocking programmes threaten the naturally spawning Baltic salmon. With the fishing pressure practices of today it is not possible to harvest most the compensatory released salmon, which creates a serious problem for the survival of the wild salmon populations, e g because of strayers.<br>We believe that it is very important to discuss <u>limitations of salmon compensatory releases</u> , if increased exploitation of reared stocks is not possible. An increased number of artificially released salmon in the Baltic Sea threaten wild Baltic salmon populations. The proposal to set a limit on the ratio between released smolt and wild salmon smolt production per country seems to be a very good proposal to handle the problem. The ratio could be set at least at 60 “wild”/40 “released” as a starting point. A final ratio per country should be set out from an advice from a scientific assessment of the impact of all salmon release programmes in the Baltic in relation to the high probability for survival of all wild Baltic salmon populations for the coming 50-100 years.. |
| <b>Section 4.6.3.</b> | <i>13. Do you support having rules or recommendations for releases of salmon included in the plan?</i>  | Yes. We believe that such actions are of crucial importance to safeguard the genetic variability of wild Baltic salmon<br>Guidelines is needed for both breeding and releasing practices. Production of reared salmon shall follow international guidelines regarding brood stock  |

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|                     |  | selection to avoid the risk of genetic mixing between reared non-native stocks with local wild stocks. Use of non-native stocks shall be phased out as soon as possible, and be made illegal. In potential rivers where salmon should be introduced again, the genetics of released salmon in such rivers with extirpated stocks should be decided via an ICES recommendation, that must be followed by all MS..   |
|                     | <i>14. What rules or recommendation would you recommend?</i>   | <p>Rules on releases of salmon shall be introduced in the plan. Such rules shall follow the the international recommendations on brood stock selection, genetics of the brood stock, and methods of rearing and release. As early life-stages as possible, preferable eggs, should be used in release programmes. Follow guidelines e g from NASCOs Williamsburg resolution, IUCN Council, FAO guidelines.</p> <p>EC presented regulations on Risk assessment for fish-farming in 2007, that that also shall be applied for all hatcheries for salmon.</p> <p>EC should perform a risk assessment on the effects of salmon releases on the wild populations in order to establish the proportion of reared smolts that can be releases without jeopardising the genetics and long-term survival of the wild populations.</p> |
| <b>Section 4.7.</b> | <i>15) Should recommendations on measures to improve the habitat and water quality in rivers form part of the management plan?</i> | Yes. Requirement to develop high quality Salmon River Management Plans shall be set for all Baltic EC MS. Such plans should include mandatory requirements on monitoring of returning spawners and out-migration, fisheries regulations that guarantee at least 200 returning spawners to each river, protection measures for salmon habitats, habitat restoration programmes to restore the historical spawning areas and to maximise the production , protection of salmon habitats for spawning/breeding, etc.  |
| <b>Section 4.8.</b> | <i>16) Should implementation plans be part of the management plan?</i>   | Yes, of course. Requirements for setting up National Implementation Plans for each river to fulfil the objectives and targets set in the management plan, should be one of the most important component.   |
|                     | <i>17) Should there be coordination of such plans and, if so, who should be responsible for it?</i>                                | Yes, a coordination is needed and should be handled by EC. Responsible for such coordination can be the DG Mare/DG Env, or a new international Baltic salmon surveillance group, with participation from all stakeholders.   |
| <b>Section</b>      | <i>18) Do you agree that the management plan should</i>  | Yes. Responsible for such coordination can be the DG Mare, or a new  |

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| <b>4.9.</b>          | <i>include the setting up of such a surveillance group and if so, who should host the meetings and administrate the work?</i>   | international Baltic salmon surveillance group, with participation from all stakeholders. An international surveillance group should be hosted by DG Mare. National support groups should be hosted by Environmental & Fisheries national Boards. All stakeholders should be invited for the international surveillance group.   |
| <b>Section 4.10.</b> | <i>19) What is your best/worst practice when it comes to monitoring in salmon rivers?</i>   | <p>Proper reporting of all river salmon fisheries landings must be established, so the TOTAL salmon landings will properly reported. .</p> <p>The system of Index Rivers, from the SAP, should be maintained, but also enlarged to more rivers.</p> <p>A good salmon river monitoring, applied for all salmon rivers, should include:</p> <ul style="list-style-type: none"> <li>-number of returning spawners, with females separated, on annual basis</li> <li>-parr densities in rivers, on an annual basis</li> <li>-number of out-migration smolts to the Baltic Sea, on annual basis (very important parameter that only a few rivers apply today)</li> <li>-description of habitat improvements(where, area in m2)</li> <li>-description of spawning habitats protected (where, area in m2, etc)</li> <li>-description of potential and historical spawning areas (where, area in m2, etc)</li> </ul> <p>We support the EC-proposals.</p> |
| <b>Section 4.11.</b> | <p><i>20a) What is your experience of separation of salmon and sea trout, both on a practical and management scale?</i></p> <p><i>20b) Could you recommend a best practice?</i></p> | <p>a)We learned from interview with Polish fisheries inspection a couple of years ago that Polish inspectors do not distinguish between salmon and sea-trout in landing controls. The situation can be the same for other Baltic EC MS.</p> <p>US salmonid fisheries apply same landing sizes for salmon/sea-trout e g in river systems, because fishermen many times do not distinguish properly salmon/sea-trout.</p> <p>b)EC must safeguard that all Baltic EC MS inspectors have a training that guarantee that they can distinguish between salmon and sea-trout.</p> <p>Apply same landing size regulations for salmon and sea-trout in Baltic Sea, because most fisheries are mixed salmon/sea-trout fisheries.</p>   |

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|   | 21) <i>Would you support a future inclusion of sea trout into a management plan if this is found advisable from a scientific view?</i> | <p>Yes, very much for important aspects related to the mixed salmon/sea-trout fisheries. Still there will most probably be problems for commercial and recreational fisheries to always separate between salmon and sea-trout.</p> <p>Apply same landing size regulations for salmon and sea-trout in Baltic Sea, because most fisheries are mixed salmon/sea-trout fisheries.</p>   |
| <b>Section 4.12.</b>  | 22) <i>What other research areas would you propose?</i>  | <p>*EC should initiate a scientific assessment on genetic effects of the impact of all salmon release programmes in the Baltic in relation to the long-term survival of all wild Baltic salmon populations for the coming 50-100 years. To find a scientific advice on the maximum allowable proportion between reared and wild salmon in the Baltic Sea.</p> <p>*Increase the tagging programmes of wild/reared Baltic salmon to get proper information to better evaluate e.g. migration patterns, straying in salmon rivers. And to get better knowledge for sustainable management practices.</p> <p>*Evaluation of the proportion of strayers in individual salmon rivers, using existing tagging data.</p> <p>*Perform studies to identify Baltic coastal areas where salmon from weak rivers would likely to be caught.</p> |
| <i>Here is room for you to write any other comments you may have</i>  |  |  |
| <p>*We believe it is very important to identify Baltic coastal areas where salmon from weak rivers would likely to be caught.</p> <p>*Proper management to guarantee the survival of the genetic resource from wild Baltic salmon populations that are extincted from its natural habitats, but only exist in hatcheries today. EC must decide on the responsibility for proper management of such distinct genetic populations between EC Baltic MS and Russia.</p> <p>*EC should invite Russia, and introduce practices to assure the participation and involvement of Russia in the international management of the Baltic salmon. Support Russia to apply same monitoring and management schemes decided by EC. Provide support to Russia to guarantee participation of Russia in all future meetings, where it is appropriate for Russia to participate.</p> |  |  |