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To

DG Mare, European Commission

Baltic Region EU Member states, Fisheries ministries

TAC setting for Baltic salmon 2011 and the current situation for returning salmon spawners in the Baltic Sea region

Dramatic decline in Baltic salmon returning spawners

Coalition Clean Baltic would like to draw your attention to the current situation for Baltic salmon. As the migration season for salmon draws to an end it is clear that the numbers of spawners gathered in different rivers are in some cases alarmingly low (see table below). It is very hard to find support for that this situation can be explained only as natural variations, and there is an acute need to respond to the situation. The TAC discussions in the Council this fall should reflect this. ICES advice should be followed, and this is especially evident this year. ICES has advised to reduce the exploitation with 25% compared to last year's actual fishing (corresponding to 59% TAC decrease) giving a quota of 120 000 individuals in the main basin.

Of the total Baltic smolt production of roughly 2,5 million smolts, 91 % stems from the Bothnian Bay and 75 % from the two biggest rivers Tornio river and Kalix river. Tornio river alone produces 47 % of the total smolt production in the Baltic Sea and a reduction in smolt production here has a very big impact. Not yet final numbers give an indication that the amount of spawners are cut in half this year in Tornio river. Unofficial information from Lithuania and Latvia also indicates reduction of returning spawners.

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Returning salmon spawners in 2010 season

Year	2008	2009	2010	2009-2010 Difference
Byske river (Swe)		1980	1734	-12%
Kalix river (Swe)	6838	6383	3482	-45%
Piteå river (Swe)	700	1050	946	-10%
Åby river (Swe)	120	180	82	-54%
Tornio river(Swe/Fin)		33 000	16211	-51%
Rickleån (Swe)		----	44	
Mörrumsån* (Swe)	1718	1107	309	-72%
Simojoki (Fin)	1843	1150	721	-37%

*= mostly salmon but also sea trout

Unclear STECF advice on Baltic salmon TAC to EC

We would also like to bring to your attention that we have noticed that STECF has made a mistake in adopting to the rules in the Commission policy paper, COM(2010)241 for giving advice on TACs. STECF concludes in “*ADVICE ON STOCKS IN THE BALTIC SEA (SGRST- 10-01)*” that none of the salmon stocks in the main basin are likely to reach the 75% smolt production target, in 2010. Also STECF states that 8 rivers will not even meet the 50% smolt production target. The main problem is that the post smolt survival rate of salmon is still falling and there is an obvious increase in fishing effort in long line salmon fishing.

After this summary of the stock status, STECF first states that it agrees with ICES advice. STECF then use the guidelines in the Commission policy paper for setting a TAC advice and decides to place Baltic salmon in category 6 resulting in a TAC of 249 900 fish. This category states as basis:

“State of the stock not known precisely and STECF advises on an appropriate catch level.”

Under this category a TAC should then be set with the :

“Aim to set the TAC according to STECF advice but do not change the TAC by more than 15%.

It is our strong opinion that the above definition of a stock does not match Baltic salmon and that salmon must be placed in category 3, stating that the

“Stock is outside safe biological limits”

This gives the guidelines to set a TAC with:

“ Aim to set the TAC to the highest value of

(a) the forecast catch corresponding to taking the highest yield in the long term, or (b) the catch corresponding to reducing the fishing mortality rate by the larger value of

(i) 30% (ii) one quarter of the difference between the current fishing mortality and the rate that would provide the highest yield in the long term but do not reduce the TAC by more than 30% as long as fishing mortality will not increase."

The STECF advice for salmon should thus in this case be a 30% reduction in catch for 2011, giving a TAC advice on 206 000 fish, which from our perspective not is sufficient, but closer to ICES advice.

Our main argument is that we do know about the status of salmon stocks, and we know that stocks are outside safe biological limits. We know about the spawning migrations and reproduction and about where the problems are. We are well aware about the problems in the fishery, especially the mixed fishery and we know there is a lot of illegal and unreported catch of salmon (STECF states 38% of catch categorized as IUU). We know that a large part of the mortality is in the recreational fishery and that it is likely to increase. Furthermore we know we have several stocks and populations in the Baltic Sea.

Baltic salmon TAC and the allocation key for EU Baltic Member states

To conclude we would like to address the problems with the relative stability in the case of salmon. A problem with the current TAC and the allocated catches per country is the fact that some countries catch their share or close to it (for example Sweden and Finland) while others are far from actually catching their quota limit. This means that under the current TAC allocation key there is little or no interest for some countries to accept the decrease in total TAC, as advised by ICES, because this will mean an actual large cut in their quota but for others it will have no effect on the fishery.

This must change and the given quota must be brought down to reflect the current national catches to allow any future reductions to be spread evenly and carried by all countries and salmon fishermen. In the case of salmon the Commission is not following the scientific advice and is not proposing a correct quota that reflects the ambitions and actual fishing today but rather an irrelevant historical figure.

CCB proposals and comments

1. The numbers of returning salmon spawners are down with around 50% in the most important rivers and we urge Baltic governments and EC to apply a precautionary approach to salmon fisheries for 2011.
The TAC must be lowered to match ICES advice of 120 000 salmon for 2011.
2. Baltic salmon is outside of safe biological limits and STECF should have placed Baltic salmon stocks in category 3, and presented a lower TAC advice in line with the Commissions policy paper COM(2010)241. STECF first states that it agrees with ICES advice.
3. The Commission must launch a discussion on how to change the TAC allocation key for Baltic salmon and move away from setting quotas that do not reflect the actual fishing.