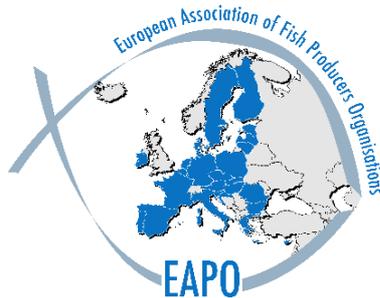


**European Association of Fish Producers Organisations**

**Association Européenne des Organisations de Producteurs dans le secteur de la pêche**



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**Letter by e-mail attachment to:**

- **Mr. Virginijus SINKEVIČIUS:** European Commissioner for Environment, Oceans and Fisheries ([cab-sinkevicius-contact@ec.europa.eu](mailto:cab-sinkevicius-contact@ec.europa.eu))
- **Ms. Charlina VITCHEVA:** Directorate-General for Maritime Affairs and Fisheries ([Charlina.Vitcheva@ec.europa.eu](mailto:Charlina.Vitcheva@ec.europa.eu))

**CC:**

- Member States
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**EAPO21-37**

**Oostende, 29 September 2021**

Dear Commissioner, dear Director-General,

**Subject: The EAPO Baltic Sea Working Group recommendations for the fishery in the Baltic Sea in year 2022**

The Baltic Sea Working Group (BSWG) of the European Association of Producers Organizations (EAPO), has recently been set up by the Baltic Sea member states producers and associations who are, in majority, also the active industry members of the Baltic Sea Advisory Council.

The BSWG generally wishes to refer to BSAC-recommendations on fisheries in the Baltic Sea for the year 2022. The purpose of issuing this additional recommendation is to offer the industry extended elaboration and further advice on particular issues of concern.

During recent years, TAC-reductions of both demersal and pelagic species have had enormous negative effects on the Baltic commercial fisheries. Fishermen and infrastructure that are both vital for the fishery have disappeared and will not return automatically with an increase of TACs in subsequent years. A responsible fisheries management should therefore also take into account these kind of socio-economic processes.

The EAPO BSWG intends to take the initiative to organise an international workshop on the current situation and on the future of the Baltic Sea pelagic fishery. At this forum, the

representatives of the administrations of the respective Member States, the Commission, the scientific institutes and the industry will have the opportunity to exchange views and work out the best approach for the management of the Baltic Sea pelagic fishery.

## **1. Demersal species**

### Cod, SDs 22-24, SDs 25-32

The eastern and western cod stocks are beyond any risk of extinction in the biological sense. There are still enough spawners to rebuild the stock if the environmental conditions allow a recovery.

During the last years (since 2018) the western cod has been managed in line with scientific advice from ICES so there was no question of biological overfishing. The present situation is obviously driven by environmental factors which have reduced the productivity for cod in the Baltic. As a consequence, the development cannot be changed in the direction by fisheries management measures. Fishermen are also victims of this development.

Assuming that the advice from ICES is a true reflection of the status of the stock, the fishing industry calls for a sufficient period to adapt to the new knowledge. It is not possible to switch from one reality to another in just one year. Therefore, the fishing industry recommends to set a TAC for the Western Baltic cod based on Fpa, at 4.461 tons in 2022. This will result in an increase in SSB of 40%.

For eastern cod, the industry suggests to set a TAC of 2.000 tons, in order not to create choke problems.

It is imperative for the continuation of the fishery that a solution is found, in which some bycatch of cod is accepted. To prevent all fishing activities on important fishing grounds out of concern for cod is not sustainable.

The EAPO BSWG supports the BSAC-advice to develop new/more selective gears in order to avoid the bycatch of cod. The trials should be planned to the widest possible extent in co-operation between fishermen and scientists. The new gear should be tested on a voluntary basis by fishermen within the commercial fishery. The final decision on which option(s) to choose to be made compulsory, should be taken after the trials have taken place in the commercial fishery.

Following the BSAC-advice, the EAPO BSWG highlights that if the selective gears are used as an important part of the solution to the present situation, it is imperative that:

- a. new gears are not made compulsory until they have been tested under commercial conditions, and;*
- b. the introduction of a new gear does not exclude the later introduction of another gear with similar or better selection.*

## Plaice, SDs 22-32

Fishermen and scientists make the same observations with increasing plaice stocks. So it is relevant to make use of the catch opportunities.

Also other flatfish are abundant and deliver sufficient catches.

Selective gears can be helpful to reduce the bycatch of cod in flatfish fisheries. There is no need to fix a plaice TAC below scientific advice.

### **2. Pelagic species**

- *Herring SDs 22-24/ BSAC Recommendation: Rollover of 2020 (TAC 1.575 t )*
- *Herring SDs 25-29, 32, ex GoR/ BSAC Recommendation: 62.353 t (EU MAP FMSY)*
- *Herring SD 28.1 Gulf of Riga/ BSAC Recommendation: 47 697 t (EU MAP FMSY)*
- *Herring SDs 30-31/ BSAC Recommendation: 111.345 t*

The BSWG supports the recommendation of the BSAC for the four Baltic herring stocks.

For the herring in SDs 22-24, the BSWG wants to highlight the importance of the socio-economic consequences of a zero advice and continued reduction of the fishery. A further reduction of the TAC will lead to negative consequences for the fishing industry and the communities who rely on the western Baltic herring.

The quota setting for Herring SDs 22-24 during the last years has resulted in an increased share of the TAC used by Norway in area IIIa, while the share of EU-fisheries has decreased. This disproportionality in conservation measures creates a disadvantage for EU-fishermen. This must be corrected immediately to recover the credibility of EU fisheries policy as an instrument for fair fisheries management according to “social justice” as a precondition of sustainable management.

We support the BSAC’s call for a more sustainable solution for the fish and the fishermen allowing the limited and small scale directed fishery on the west Baltic (SDs 22-24) herring to survive.

ICES is looking into the lack of correct historical catch data on the pelagic fishery in the Baltic. There are several unknown sources for errors in the historical data, for example the size of the Russian catches and misreporting between vendace, herring and sprat. The EAPO and BSAC fishing industry are willing to continue to work together with the scientists and control authorities in the respective Member States to improve data collection. Hopefully the ICES-benchmark planned for central herring and sprat in the spring of 2022 will shed some light on these matters.

### *Sprat SDs 22-32/ BSAC Industry Recommendation: 373.210 t. (the EU TAC : 335.590 t.)*

In the case of the Sprat SDs 22-32, the BSWG recommends the position of the BSAC-industry which is the FMSY upper of 373.210 tonnes (the EU TAC of 335.590 t.). The FMSY upper remains within the sustainable MSY-range recommended by ICES.

The rationales are based on the Baltic MAP Article 4:5 F that the FMSY-upper may be used when the stock is above MSY-Btrigger. This is also the case if there is scientific advice or evidence that there may be negative interspecific interactions.

The Sprat SSB is well above the reference values. Sprat predation on cod eggs is known and scientifically documented. And with the current situation for the cod stocks, all measures should be taken to reduce the natural mortality of the cod, including using the higher range for sprat to reduce egg predation as well as food competition between sprat and juvenile cod for plankton.

The sprat also competes with the herring for food, and a lower sprat biomass may also be positive to allow the central Baltic herring to recover from its current low biomass levels. We believe that maximising the sprat quota, will help the situation for both herring and cod, and is according to the ecosystem approach.

As for the socio-economic context, maintaining the sprat TAC on the highest level recommended by ICES and in accordance with the EU MAP for the Baltic Sea, is also the real tool to mitigate the negative socio-economic impacts on the sector (producers, processors, traders).

There is absolutely no need for fixing a TAC lower than the ICES-advice to prevent bycatch of other species. Bycatches are accounted for in the ICES-models. Herring bycatch in sprat fisheries is not a problem even with a lower herring quota due to separation of fishing grounds for sprat and herring.

### **3. Salmon SDs 22-31 Salmon SD 32**

With a zero advice for salmon, it is important that all fisheries, both commercial and recreational, now shoulder the responsibility of reducing the fishing pressure further and to increase the control and accountability for all types of salmon fishing. It is important to point out that the zero advice for salmon will have enormous negative effects on the Baltic small scale coastal family fisheries segments. There has to be a quota set for the commercial fishery, because it is unacceptable that the change in management would exclude the fishermen who build their existence on that fishery, and also to secure a possible bycatch in other fisheries.

Sincerely yours,



Jarosław Zieliński  
Chair of the Baltic Sea Working Group  
EAPO