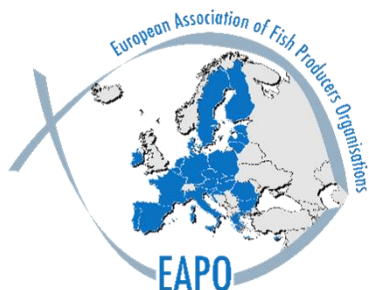


## European Association of Fish Producers Organisations

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



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### Baltic Sea Working Group Advice on 2024 Fishing Opportunities

	EU quota 2023	ICES advice for 2024	Change in % <sup>1</sup>	Commission proposal for 2024 <sup>2</sup>	EAPO advice for quotas for 2024
Cod 22-24	489	24	-95%	p.m. <sup>3</sup>	489
Cod 25-32	595	0	-100%	p.m.	595
Plaice 22-32	11,313	17,947	+ 58%	p.m.	17,947
Herring 22-24	788	0	-100%	p.m.	27,346
Herring 25-29, 32	70,822	52,549	-25%	p.m.	52,549
Herring 30-31	80,047	63,049	-21%	p.m.	80,463
Sprat 22-32	224,114	241,604	+7%	p.m.	247,704
Salmon 32	9,455	11,800	+24%	10,144	11,800
Salmon 22-31	64,000	0	-100%	53,967	63,811

<sup>1</sup> Compared to advice 2023

<sup>2</sup> p.m. : Pro Memoria Final TAC will be given at a later stage

## Comments on Baltic Sea Stocks

Since EAPO's last fishing opportunity position paper, the situation in the Baltic Sea has not changed. Fishers are still faced with an imbalance in the ecosystem. Water temperatures are historically high, and the eutrophication problems withstand.

Fishery has generally an impact on the state of the stock, but mortality due to other causes increasingly surpasses fishing mortality and has impact condition of several Baltic stocks.

For fishing to continue in the Baltic, we must collectively ensure that this is taken into account. EAPO members bring to the attention of the council and of the Baltic Member States that **fishing mortality reduction cannot be the only solution to rebuild stocks that stay depleted due to other anthropogenic cumulative impacts.**

Regarding selectivity issues, the Commission will be publishing an implementing regulation on selective fishing gears in the Baltic Sea, EAPO insists on the need to leave time to fishers to adapt and to allow the use of other selective gears alongside the NEMOS section.

On a final note, EAPO would like to highlight issues related to sprat and herring. In the Baltic Sea, there is a certain level of mixing between herring and sprat stocks, with the degree of mixing varying depending on area and season. Contrary to common belief, fishers have the knowledge to adjust their catch composition by planning when and where to fish, ensuring compliance with their vessel quota allocation for both stocks. Generally, sprat and herring are fished separately, but often landed in combination. Some countries only have a small allocation of Central Herring quota, so the fishery mainly targets sprat, with herring making up a portion of the landing ranging from 5% to 15%. However, it is noteworthy that individual sprat landings may contain as little as 1% herring.

In short, fishers target the two stocks in different areas and at different depths. However, the two are often, but not always, landed in combination. **Considering this, EAPO reiterates the need to managed sprat and herring separately as they are fished separately.**

Finally, it is important to underline that ICES does not provide specific recommendations for managing sprat in relation to cod. However, estimates of the amount of sprat consumed by cod are factored into the multispecies model, which determines natural mortality rates for sprat. This consideration ensures that the cod population's food requirements are accounted for in the ICES advice.

As a sidenote, EAPO members would like to highlight that, technologically speaking, sprat and herring fishing activities are carried out using active gears.

## Comments on individual stocks

COD SDs 22-24:

### **EAPO recommends a rollover TAC for western Baltic Cod for 2024.**

When compared with last year's advice, the fishing opportunities for western Baltic cod for 2024 is lower. The biomass for cod has been decreasing steadily since 2008 and shows no sign of improvement despite the steady decrease in fishing opportunities (around 20,000 tons in 2008 to 489 in 2023 to 24 tons in 2024-2025). As said by ICES<sup>1</sup>, *"the Western Baltic cod stock has experienced a decrease in body condition due to such changes in the ecosystem as seasonally poor oxygen conditions*

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<sup>1</sup> ICES 2023 advice on Western Baltic cod

*in the bottom water, which can adversely affect the habitat, benthic food supply, and metabolism of cod.”*

SSB is well below Blim and the SSB index shows a decreasing trend which has led ICES to suggest a 97 % decrease in TAC. EAPO members recommend that the 2024 TAC be set as high as possible. This is since cod bycatch is very important when targeting plaice or other important species.

To complement this advice, EAPO would like to insist on ICES’s advice on conservation aspects.

*ICES advises that western Baltic cod conservation should be considered within the context of degradation of ecosystem status resulting from cumulative anthropogenic pressures and climate change. Habitat restoration efforts, focusing on the reduction of eutrophication to improve bottom oxygen content, are recommended.*

Baltic Sea fishers have seen their fishing opportunities reduced with the end promise that it would lead to a rebuilding a Baltic Sea stocks. The critical state of Western Baltic Cod shows that limiting fishing pressure cannot rebuild the stock alone, cumulative anthropogenic impacts must be addressed.

Finally, EAPO, in line with the BSAC recommendation request that an evaluation of the effectiveness of measures to protect cod spawning areas be carried out. Moreover, witnessing interyear variability, we would request that ICES publishes an advice on cod in areas 22-24 for 2025.

#### Cod SDs 25-32:

##### **EAPO suggests a rollover quota of 595 t for 2024.**

As it was written for the western Baltic Sea cod stock, the eastern Baltic Sea cod stock is also mainly caught as a bycatch by flatfish fisheries. Under the landing obligation, setting a zero TAC for this stock would make it a choke species for fishers targeting plaice. As was the case for Western cod, EAPO also recommends removing the clause on cod only being caught as bycatch.

EAPO, as for western Baltic cod, would like to insist on ICES’s advice on conservation aspects and on the fact that Eastern Baltic cod natural mortality is higher than fishing mortality. Both these statements highlight the need for Baltic Member States to limit other anthropogenic impacts if rebuilding of stocks is to happen.

Regarding ICES’ advice, there remains a small possibility that, due to low catches and COVID-19 disruption, there could be more fish in the Baltic. Moreover, despite the Russian federation catching most of the stock, no landings have been reported in 2022. The lack of catch reporting may have impacted ICES’s advice.

As highlighted in EAPO’s letter<sup>1</sup> and EAPO’s contribution to the consultation on selective gears for Baltic Sea fishers<sup>2</sup>, EAPO members support the implementation of new selective fishing gears in the Baltic. However, the fact that the Commission is making the use of these new gears mandatory is not acceptable. Further operational trials must be done to ensure it can safely be used by fishers. We believe the mandatory use should be postponed one year. EAPO also insisted on the need to allow the

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<sup>1</sup> [https://eapo.com/UserFiles/EAPO23-](https://eapo.com/UserFiles/EAPO23-38%20Introduction%20of%20new%20fishing%20gear%20in%20the%20Baltic.pdf)

[38%20Introduction%20of%20new%20fishing%20gear%20in%20the%20Baltic.pdf](https://eapo.com/UserFiles/EAPO23-38%20Introduction%20of%20new%20fishing%20gear%20in%20the%20Baltic.pdf)

<sup>2</sup> [https://www.eapo.com/UserFiles/EAPO23-46\\_reply\\_selective\\_fisheries\\_Baltic\\_Sea\\_final.pdf](https://www.eapo.com/UserFiles/EAPO23-46_reply_selective_fisheries_Baltic_Sea_final.pdf)

use of other gears that have proven to be selective: 90 mm codend in the sole fishery Subdivision 22, Modified T90 without the use of NEMOS.

**Finally, EAPO members** underline that there are no positive results to show for the cod population from the summer closure, which therefore seems entirely disproportionate. They underline that fishing mortality has a negligible effect on the current low status of the eastern cod stock. The low growth, poor condition, and high natural mortality of cod are related to the changes in the ecosystem.

#### Plaice in SDs 22-32:

**EAPO recommends following the ICES advice and setting the 2024 TAC at 17,947 tonnes in accordance with the MSY approach.**

EAPO strongly support that an exemption from the landing obligation is introduced for the Baltic plaice – as it is the case for almost all other areas. Fishers see absolutely no reason or benefits in killing small plaice that according to scientific results would survive in high proportions if released.

#### Herring 22-24

**EAPO recommends that the 2024 TAC for herring in SDs 20-24 management area should be set at 27,346 tonnes.**

EAPO finds it unacceptable, that Norway's unwillingness to accept that ICES give advice in line with the EU management plan results in an advice of zero, when the TAC could be set in line with ICES interpretation of the plan to 27,346 tonnes. This quantity should then, as has been the tradition be split 50/50 into a proportion to be allocated to the fishery in 3a and a quota in Subdivision 22-24 of 13,673 tonnes. For Herring in Skagerrak, Kattegat and western Baltic, the fishing pressure is below FMSY, and the Spawning stock size is below Blim. ICES's advice recommends a zero TAC for 2024.

EAPO members also wish to highlight that the management of this stock is challenging because the stock is composed of different sub-populations which constantly mix and fluctuate. They heavily insist on the need for ICES to use the Baltic MAP when setting fishing opportunities.

Finally, they also underlined the need to improve knowledge of the herring stocks (reference points and the productivity of the ecosystem). Only through better knowledge can better management be achieved. In line with ICES's advice on conservation aspects, EAPO members would like to see implemented measures to protect and restore known spawning habitats and nursery areas. ICES advises that measures to protect and restore known spawning habitats and nursery areas are needed

**EAPO does not recommend** a zero TAC for WBSS in 2023. EAPO insists on the need, in accordance with the CFP, to consider the socio-economic consequences of a zero advice on the fishing industry and the coastal communities it supports. Several fleets, processors and communities rely on the western Baltic herring as a component in the targeted fisheries for sprat and other herring stocks.

#### Herring 25-29, 32

**EAPO members recommend that the 2024 TAC for herring in the central Baltic management area should be 52,549 tonnes.**

For herring in central Baltic Sea, fishing pressure is below FMSY and Biomass is below Blim.

EAPO's suggestion aligns with the MAP FMSY scenario within the ICES advice, allowing for an increase in SSB.

The corresponding EU TAC in the central Baltic management area for 2024 would be calculated as: 52,549 tonnes + 902 tonnes – 2,959 tonnes = 45,500 tonnes (MAP FMSY).

**Members of EAPO would like to highlight that** the use of B0 is arbitrary and does not take into consideration normal fluctuations between herring and sprat in an ecosystem-based perspective. As such, we would like to share our concerns about using B0, which represents the untapped SSB under present conditions in the evaluation, and acknowledge the uncertainty highlighted by ICES regarding the calculation of new reference points, while recalling the consistent stability of the SSB over an extended period.

#### Herring 30-31

**EAPO recommends setting the 2024 TAC for herring in this management area at 80,463 tonnes, which is in accordance with the FMSY-scenario.**

#### Sprat 22-32

**EAPO Members recommend** setting the **2024 TAC at F<sub>M<sub>SY</sub></sub> upper of 247,704 tonnes**. Taking into account the share for Russia (10.08%), this would give EU quota of **222,735 t**. This TAC is within the range recommended by ICES and would result in a 15.9% increase of the SSB in 2025.

As highlighted in EAPO's 2023 position paper, EAPO recommends the use of an **ecosystem-based approach to the fisheries management in the Baltic that would lead to high sprat quotas to reduce the sprat biomass to a lower level, thus reducing predation on cod eggs**.

EAPO members' opinion has not changed since last year, the negative interspecific interaction between sprat and juveniles of cod and herring highlights the need to use the higher range of FMSY upper.

#### Salmon SD 32

EAPO members recommends that the 2024 TAC for salmon in SD 32 should be no more than 11,800 salmon. This would correspond to reported commercial landings of 10,100 salmon.

#### Salmon SD 22-31

The TAC should be 63 811 salmons and fishing should be permitted in SDs 29N-31 (=north of 59 30' N), the same arrangement as in year 2022 and year 2023.

## Recommendations

The Baltic Sea is a hotspot of climate change regime shift. EAPO members witness the changes in salinity, oxygen levels, and sea temperatures. Due to its boundaries, fish cannot migrate north to adapt to climate change. The impacts of climate change as well as those of non-fisheries related anthropogenic activities can be assessed at their full potential. This translates into a series of advices suggesting a decrease of TACs in the Baltic Sea. EAPO members wish to underline the necessity to understand these changes to adapt as well as to prevent them. **We therefore call on the Commission and, on the Council, to develop a special scientific regime adapted to the Baltic Sea.** This will translate into more workforce and funds for ICES to benchmark Baltic Sea stocks. Given these alterations in the ecosystem, reference points in the Baltic Sea need to incorporate these changes to fulfil the requirement of employing best available science.

The same changes in ecosystems due to climate change and anthropogenic pressures also affects the reliability of ICES's advice. The ecosystem is becoming increasingly unpredictable, making ICES's work harder. **EAPO members insist that ICES includes in its assessment data coming from fishers, to better understand how these changes are affecting the ecosystem.**

When it comes to sprat and herring, EAPO members would like to reiterate the necessity of adapting management measures to fishing practices. Both stocks cannot be managed jointly if fishers catch them separately. **EAPO members call on the Commission and the Council to change fisheries management for both these species.**

To sum up, EAPO believes that there is a need for new regulations in the Baltic Sea. Fisheries management has shown that it works when the state of the ecosystem is good. However, for the Baltic Sea, recent years highlight the need for added measures to address the state of the ecosystem. **Fisheries cannot be the only sector held responsible for the lack of stock rebuilding in the Baltic.**