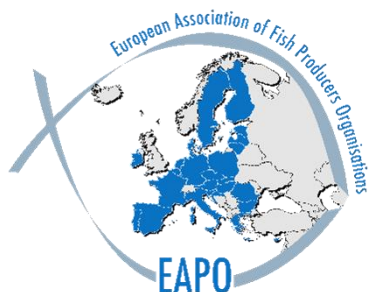


European Association of Fish Producers Organisations

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



EAPO / AEOP

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Letter by e-mail attachment to:

- **Mr. Virginijus SINKEVIČIUS:** European Commissioner for Environment, Oceans & Fisheries (cab-sinkevicius-contact@ec.europa.eu)
- **Ms. Magdalena ZASEPA:** Director of the Fisheries Dept, and Head of the PL presidency in the Baltfish Forum (Magdalena.Zasepa@minrol.gov.pl)

CC:

- EP PECH Committee Secretariat
- EU Council Secretariat

EAPO23-57

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Oostende, 5 October 2023

Dear Commissioner, Dear BALTFISH members,

Subject: Central Baltic Herring fishing opportunities for 2024

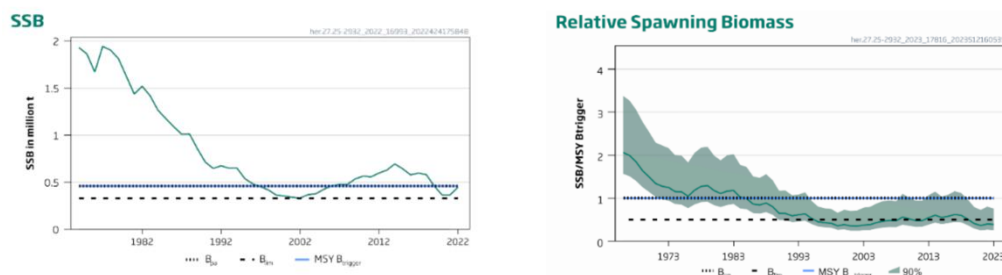
I am contacting you on behalf of the European Association of fish Producers Organisation (EAPO), regarding the situation of the Central Baltic Herring (CBH). As you are aware, CBH is a crucial species for all Baltic Member States. For some fishers, CBH can represent up to 90% of their yearly turnover. CBH management is included in the Baltic Sea Multi Annual Plan (BSMAP) and TACs (Total Allowable Catches) are decided on a yearly basis by the Council before being divided into an EU quota and a Russian Federation quota.

The 2023 ICES (International Council for the Exploration of the Sea) advice on fishing opportunities for 2024 for CBH is based on the results of ICES's WKBALTPEL 2023 benchmark. At the benchmark, new reference points were calculated and these are included in the advice. The use of new reference points led to a significant decrease in advised catch. This decrease is not advised because surveys or fisheries

dependent data have indicated a stock decline but is merely a consequence of the new reference points.

The SSB (Spawning Stock Biomass) reference points were, because of the new model, revised during the benchmark, which is standard procedure in ICES. However, the method used to set the new SSB reference point is highly controversial and is at present not part of/ or described in ICES own guidelines for setting reference points (ICES 2021,). This led to – quite untraditionally – several scientists insisted on their opposition to the new method being recorded as a minority statement in the report from the meeting.

Despite the internal disputes in ICES, the **Blim reference point was increased from 330 kt to 561 Kt**. An increase of 70%, although the SSB was only upscaled with 20%. Below are graphs illustrating biomass estimates from ICES advice in 2022 and 2023 for comparison. This shows that the new model suggests that the biomass has been at or below Blim since 1990 despite this not being the case in the previous advice, where it was never below Blim.



Because the biomass is now believed to be below the new Blim, article 4 of the BSMAP is implemented, which results in a 52% decrease in catch opportunities for 2024. Reports from fishers who have observed high abundance of herring in recent years indicate that the new ICES advice is out of sync with those who spend their time on the Baltic Sea.

EAPO believes that drastic changes in ICES’s advice over a short period, must be based on solid science, both fisheries dependent and fisheries independent, tested, and recognised methodologies, consensus-based decisions within the scientific community and last but not least recognizable trends in fishers' perception of the marine environment. To the concern of EAPO, the proposed 52% reduction in fishing opportunities for 2024 for CBH does not fulfil the above criteria. EAPO finds it especially concerning that the ICES advice is based on the results of a benchmark process in which four of the leading scientists in Europe could not support the methodology, nor the results. This raises deep concerns in relation to the short-term stability of ICES and naturally the robustness of the advice.

As highlighted previously, the main outcome of ICES’s advice pertains to the fact that the biomass of CBH is below Blim. According to the BSMAP, management must now ensure that there is a 95% probability that the biomass will be above Blim (article 4.6). The formulation on this article is unclear and has led to confusion on whether it refers to the long term or annual probability. The BSMAP does not specify a timeline in article 4.6. EAPO follows the ICES interpretation - that the 95% probability is referring to the long-term probability and not the annual probability.

Using ICES’s advice and after enforcing article 4.6, the Commission has for 2024 proposed the implementation of a bycatch only TAC for CBH by highlighting that the biomass has been below sustainable levels since 1990. EAPO is of the position that it does not matter in what fishery the quota is caught, what matters is that only a sustainable portion is caught.

In this context EAPO members would also like to underline that the benchmark and change of model for Bothnian Herring resulted in significant changes of the advice as well as TAC. The serious uncertainties in the advice may pose a risk to the confidence in scientific advice given.

To conclude, EAPO members strongly insist that the following measures are to be taken:

- Regarding the issues identified on the ICES advice, EAPO would encourage the Commission and MS to pursue a new benchmark for CBH as soon as possible and meanwhile base the decision regarding 2024 TAC for Central Baltic Herring on the model and reference points used for 2023 advice.
- When it comes to Article 4.6 of the BSMAP, EAPO would suggest the following approach when setting the 2024 fishing opportunities: using the catch option table in the ICES advice, EAPO can deduct, that a rollover of the TAC in place for 2023 will result in an increase of the biomass of approximately 20%. This would be in line with article 4.6 and at the same time limit the impacts on fishers.
- Finally, EAPO would strongly propose to set a catching TAC and not a bycatch TAC.

EAPO members would like to express their gratitude to BALTFISH members and Commissioner Sinkevičius for their valuable time and will be very willing to meet and discuss these significant issues with your services at a convenient time for you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Esben Sverdrup-Jensen', written in a cursive style.

Esben Sverdrup-Jensen

President of the European Association of fish Producer Organisations