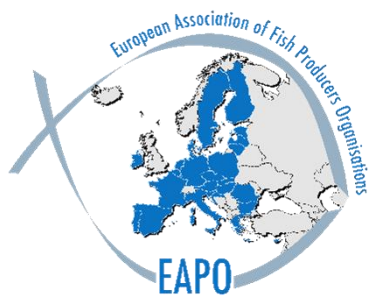


European Association of Fish Producers Organisations

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



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To: To the kind attention of:

- *DG Mare representatives*
- *EU Council Secretariat*
- *BALTFISH Secretariat*
- *EP PECH Committee Secretariat*
- *Political advisors of the parliamentary groups in the EU Parliament*

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EAPO position paper for the Baltic Sea TACs

[Umbrella statement on the state of the Baltic Sea](#)

The state of the Baltic Sea is continuing to be worrying for Baltic Sea fishers. Impacts of Climate change added to pollution from human activities impacts the marine ecosystem and thus the state of Baltic Sea stocks. This new regime should be addressed in stock models by ICES. As we had underlined last year in our advice, there is a need to increase the funds allocated to scientific advice and modelling to bring certainty and restore trust in science.

Despite years of radical reductions in fishing pressure, comprehensive spatial and temporal closures in fishing / spawning grounds, stakeholders are witnessing a lack of rebuilding and recovery of Baltic Sea fish stocks. According to the scientific community, this lack of rebuilding is unrelated to fishing and is the result of predation by seals, predation by cormorants, offshore renewable energy development, land-based pollutions, eutrophication and climate change.

It will be necessary to address these impacts through relevant EU legislation. This will be the opportunity to fully implement the ecosystem approach, by including and addressing all the impacts and not only fisheries. This is also underlined in the Commission's latest communication on the state of stocks: *"This, in part, stems from failure to implement EU legislation"*¹.

Another issue central to the Baltic is the impact of Russia's IUU fishing activities. EAPO members support the work undergone by ICES to include these activities in the modelling of fish populations.

Finally, we are aware of the issues faced by ICES in terms of human resources to carry out mixed fisheries advice. These advices are central to fishers and EAPO members are requesting that this matter is considered and addressed.

Cod in SDs 22-24

Regarding the western Baltic cod stock, Ices recommends a 24 tons TAC for 2025, EAPO members ask for a rollover TAC for next year, keeping a bycatch TAC of 340 tons.

Cod SDs 24-32

For the eastern Baltic cod, the matter is different. It seems that recruitment is stable, but that the issue revolves around the growth of the juveniles. From an EAPO perspective, this would be due to the fact that many factors other than fishing impact the development of the stock (predation by seals, predation by cormorants, land-based pollutions, eutrophication and climate change).

There is a need to investigate food availability for young cod, and to take all these factors into account when deciding TACs, when modelling the stock and when managing anthropogenic impacts. One cannot expect the state of the Baltic to improve solely by limiting fishing pressure.

Finally, since the beginning of Russia's invasion of Ukraine, having data from Russia has proved to be challenging, EAPO members welcome the initiatives taken by ICES to tackle this issue.

Overall EAPO members are requesting that a rollover TAC be put in place for 2025.

Herring SDs 22-24

For spring spawner herrings, EAPO would request that a rollover TAC be agreed upon.

We wish to bring to the attention that in some countries such as Sweden, a significant portion of the stock is being fished by recreational fishers, up to 5 times what commercial fishers are allowed to catch. It is important that these catches be recorded and included in the modelling of the stock and necessary measures for the recreational fishery should be taken.

¹ COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL Sustainable fishing in the EU: state of play and orientations for 2025.

For the second year in a row, ICES advises that measures to protect and restore known spawning habitats and nursery areas are put in place. Seeing the degraded state of the Baltic Sea, EAPO members call on urgent measures to ensure that the spawning habitats of western Baltic herring are safeguarded.

Herring SDs 25-29, 32, ex GoR

Regarding central Baltic herring, the 2024 advice is very different from the advice that had been published in 2023. The 2023 benchmark of CBH led to the upward revision of Blim by 71%.

The 2024 advice for 2025 TACs suggests either 129% (F=MAP range F_lower_x) or 139% (f=F_MSY_x) increase when compared to 2023 advice, allowing fishers to slowly move back to normal levels of catches.

EAPO members request that ICES's FMSY advice should be followed. This should be 139% in line with the MSY approach.

Moreover, we are requesting the removal of the spawning closures periods that were a result of previous stock situation, simply an action to prevent a zero quota which is not the case now.

Herring Gulf of Riga 28.1

Regarding Herring in the Gulf of Riga, EAPO members recommend that the ICES advice be followed, and that the TAC be set in the same vein (+ 10% compared to previous advice)

Sprat SDs 22-32

Regarding Sprat in the Baltic Sea, the situation is complicated. We have been seeing 3 years of relatively low recruitments in a row. EAPO members question the validity of this data seeing the issues faced by other pelagic stocks in terms of scientific advice. Moreover, the recruitment has historically been fluctuating between years.

As such, EAPO members request that the TAC be set in line with the lower range of FMSY EU MAP, 130 195 tonnes. This is in line with the provisions included in the BSMAP as the spawning stock biomass is above the reference points and would allow for an increase of biomass of 45%.

Moreover, we are requesting the removal of the spawning closures periods that were a result of previous stock situation, simply an action to prevent a zero quota for herring which is not the case now.

Plaice SDs 22-32

Regarding Baltic Sea Plaice, EAPO members are of the opinion that the TAC should be set in line with scientific advice. For EU fishers, only 10% of the quota is caught due to the bycatch regulations on cod. EAPO members would like to underline their capacity at catching plaice without catching any cod in subarea 24. However, this area being closed to protect cod, fishers are left with catching only 10% of their quota.

EAPO members would welcome a broader discussion on the implementation of cod protection in the Baltic Sea to demonstrate their capacity at both protecting cod and fishing plaice.

Salmon SDs 22-31

Salmon in the Baltic Sea faces a similar situation as plaice: Quotas are not fully fished due to fisheries management restrictions. As such, **EAPO members believe that the quota and the restriction to existing coastal fisheries alongside a 40,000 individuals quota is sufficient for 2025.**

Salmon SD 32

This is also the case for Salmon in 32, the quota is sufficient for fishers. There is however a need to work to improve data collection. This stock is being fished both by commercial and recreational fishers, and data is unevenly available for both fisheries. EAPO members would request that work be done in order to even this availability.

Closures to Protect cod spawning in the summer

Article 7 of Council regulation (EU) 2023/2638 sets provisions to close fishing activities to protect cod spawning, in subdivision 25 & 26 from May to September, and in subdivisions 22 & 23 from January to March. These provisions have been in place since 2021. Since the implementation of these measures, the cod stocks have not recovered despite a significant reduction in fishing pressure putting F below FMSY, nor has the measures been evaluated. For EAPO members, this means that other impacts must be assessed and addressed to ensure the rebuilding of the stock. This is further underlined by ICES as they request 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 recommended².”*

Moreover, this closure extends to pelagic fisheries as well. However, science is lacking to prove that pelagic fisheries impact cod during their spawning period. EAPO members believe this is enough to allow pelagic fishers to fish during the closures.

In the meantime, EAPO members request that the Commission evaluates the effectiveness of these measures, as the closures are enforced at a time where prices of plaice and cod are high, leading to significant socio-economic impacts on Baltic fleets.

Misreporting issues in the Baltic Sea

ICES underlines the issues related to potentially misreporting herring as flounders. EAPO members stand ready to work with the Control Authorities in order to assess the misreporting and ensure that best data available can be used for ICES's advice process.

² ICES. 2023. Cod (*Gadus morhua*) in subdivisions 22–24, western Baltic stock (western Baltic Sea). In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, cod.27.22–24. & ICES. 2024. Cod (*Gadus morhua*) in subdivisions 24–32, eastern Baltic stock (eastern Baltic Sea). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, cod.27.24–32. <https://doi.org/10.17895/ices.advice.25019216>