

European Association of Fish Producers Organisations

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



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Document by e-mail attachment to:

- *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-BSWG recommendation on herring in SDs 30-31 – Bothnian Sea

EAPO takes note of the ICES advice on herring in SDs 30-31 as published on 16th September 2024.

Considering the following statement from the EAPO BSWG Position Paper on Baltic Sea Fishing Opportunities for 2025 as published on 28 June 2024¹:

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

¹ <https://www.eapo.com/swfiles/files/download.php?myfile=EAPO24-50-EAPO-BSWG-Position-Paper-on-Baltic-Sea-Fishing-Opportunities-for-2025-correction.pdf>

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.

According to the scientific community predation by seals, predation by cormorants, offshore renewable energy development, land-based pollutions, eutrophication and climate change other than fishing also have great impact on the Baltic Sea fish stocks. These impacts should be addressed 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*" (*COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL Sustainable fishing in the EU: state of play and orientations for 2025*).²

The EAPO BSWG requests setting the TAC for this stock according to the scientific advice following the EU Multiannual plan at Flower: Flower × SSB(2025)/MSY B trigger = 66 446 tonnes). Unfortunately, the fishing industry is forced to adopt a cautious stance and pay the price for non-fishing factors affecting the stock.

² COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL Sustainable fishing in the EU: state of play and orientations for 2025.