

Copenhagen 8th July 2019

BSAC recommendations for the fishery in the Baltic Sea in 2020

The BSAC recommends setting the catch levels for the Baltic stocks in 2020 at the values indicated in the table below. For all stocks, the recommendations are formulated and agreed after consideration of the biological advice, as presented by the ICES Vice-Chair of ACOM, Colm Lordan, to the Joint WG of the Baltic Sea Advisory Council on 11th and 12th June 2019.

	ICES advised total TAC 2020¹	BSAC recommendation for EU TAC 2020	Minority position recommendation for EU TAC 2020
Cod SDs 22-24	5.205 - 11.006 t (total catches)	9.515 t No spawning closures Same bag limit as for 2019 for recreational	≤3.065 t - Close SD 24 to cod fishing. - Introduce a spawning closure for Western Baltic cod in SDs 22-23 (February & March). <i>Or</i> ≤2,329 t - Close SD 24 to cod fishing. - If no spawning closure for Western Baltic cod in SDs 22-23 (February & March).
Cod SDs 25-32	0	7.233 t	0
Herring SDs 22-24	0	9.001 t (rollover)	0
Herring SDs 25-29, 32, ex GoR	130.546–214.553 t	153.384 t	≤153.384 t - Consider setting the TAC in the lower FMSY range (114.081 - 153.384 t) based on “ <i>issues relevant for the advice</i> ” (see ICES advice).

¹ Note that reference is made to ICES headline advice only. More details and nuances may be found in the “Issues relevant for the advice” section of the ICES advice.

Herring Gulf of Riga SD 28.1	30.382 t	34.445 t	≤34.445 t
Herring SDs 30-31	65.018 t	75.398 t	≤65.018 t
Sprat SDs 22-32	169.965 – 233.704	230.156 t	≤203.027 t - Introduce restrictions on the sprat fishery in SDs 25-26 in order to redistribute the fishery to SDs 27-29 & 32. - Consider setting the TAC in the lower FMSY range (152.833 – 203.027t) based on “ <i>issues relevant for the advice</i> ” (see ICES advice).
Plaice SDs 22-32	SDs 21-23 10.636 t SDs 24-32 2.826 t	SDs 22-32 10.452 t	SDs 22-32 ≤6.895 t
Salmon SDs 22-31	116.000 individuals (total catch), 59 800 (TAC)	91.132 individuals (rollover)	58.664 t individuals (ICES reported wanted catch)
Salmon SD 32	11.800 individuals (total catch), 9700 (TAC)	9.703 individuals (rollover)	8.798 t individuals (ICES reported wanted catch)

Please note that the recommendations relate to the TACs for the regulatory areas, not to the different stock components. A detailed explanation of how the recommendations for each stock have been reached is given in the text below.

Cod SDs 22-24

The spawning stock biomass (SSB) of the western Baltic cod stock will be above MSY $B_{trigger}$ in the management year 2020. ICES therefore advises that when the EU multiannual plan (MAP) is applied, total catches in 2020 corresponding to the F ranges in the plan will be between 5.205 tonnes and 11.006 tonnes.

The BSAC points out the fact that despite a downward revision of the SSB in 2018, the western Baltic cod stock shows an increasing trend and growth is considered normal. The fishing industry has reported good observations of the 2016 year class and points out that the warm summer of 2018 could have affected its distribution, leading to the low result in most recent assessment. **The BSAC** recommends setting the 2020 TAC for cod in SDs 22-24 as a rollover of the TAC for 2019. A TAC set in accordance with the upper limit of the management plan would give 11.006 tonnes. If the suggested TAC is deducted from this amount, this would leave 1.491 tonnes for the recreational fishery, roughly the same amount as they are expected to catch with the present regulations. If the management scenarios that are in place for 2019 are continued in 2020, this will result in a total fishery that is very close to the scientific advice.

The BSAC does not recommend any spawning closures and refers to the fact that ICES has not reached any definitive conclusions on the subject and that it is not part of the advice. The BSAC also notes that ICES has not looked into the possible effects on the rebuilding of the SD 22-24 herring stocks that the TAC for cod may generate. The BSAC generally encourages further work on ecosystem/multispecies issues.

The BSAC refers to the management of SD 24 under the chapter eastern cod stock, but does not recommend raising the TAC with a proportion of eastern cod, given the alleged bad status of that stock

The group of OIG² members recommends that in line with ICES advice, the TAC for 2020 should not exceed **3.065 tonnes** and be caught only in SDs 22-23 if a temporal fishery closure during the spawning time (February & March) is implemented. If no spawning closure is implemented, the TAC should be caught only in SDs 22-23 and should not exceed 2.329 tonnes.

This is based on the Baltic Sea MAP Article 5(1), which applies when the Spawning Stock Biomass (SSB) is below the MSY $B_{trigger}$ reference point to reduce fishing mortality to MSY F_{lower} ; and based on ICES advice. The OIG notes that the SSB is just below MSY $B_{trigger}$. The ICES advice highlights that the SSB *“is presently above B_{lim} and close to MSY $B_{trigger}$. [...] Recruitment (R) has been low since 1999; [...] The recruitment in 2018 and 2019 (age 1) are the lowest in the time series.”*

Furthermore, the OIG underlines that ICES writes: *“The increase of SSB in the forecast is mainly due to one strong year class (the 2016 year class) [...] If no stronger year classes occur in the coming years this will lead to a rapid decline of the stock. ICES therefore suggests to use the $F_{MSY lower}$ value in the MAP when setting the TAC.”*, and *“Last year’s estimation of the large 2016 year class has been revised down by 54%.”*

² WWF, Oceana, CCB, Fisheries Secretariat, Finnish Association for Nature Conservation and BalticSea2020

This year class is the most important year class contributing to the catch.” Precaution is needed to prevent a rapid decline in the stock and potential catch in future years; thus using the MSY F_{lower} is justified and a specific part of the ICES considerations.

The same OIG members also recommend that all cod fishing be closed in SD 24 due to the unavoidable catch of eastern Baltic cod in SD 24, for which ICES has advised a zero catch in 2020.

The group of OIG members underlines that ICES highlights in “*issues relevant for the advice*” that “*catches in subdivision 24 should be zero in order to comply with the zero catch advised for EB cod*”; it also notes the potential negative affect on spawning if the total advised western Baltic cod commercial catch (effort) from SD 24 is displaced to SDs 22-23. As such, they recommend the reintroduction of a temporal fishery closure in SDs 22-23 during the spawning time (February & March).

The BSAC representatives of small-scale fishers do see substantial benefits in protecting the spawning stock by means of seasonal closures.

The BSAC would support some form of spawning closure, if necessary.

Recreational anglers recommend no change to current recreational regulations in ICES SDs 22-23. In SD 24 a potential spawning season closure should only encompass the geographic areas where the stock spawns and it should include recreational fishing. The German anglers recommend no change to current recreational regulations in ICES SDs 22-23, but prefer a spawning season closure (February & March).

Cod SDs 25-32

The BSAC clearly recognises that there is no doubt that the eastern Baltic cod is in a critical state. Therefore, it has recommended some immediate measures concerning this stock to be taken already in 2019.

The BSAC underlines that there are no short-term solutions. There is a need to implement a long-term remedial plan. The problem needs to be approached in a holistic way, taking into account the cod stock, but also the people living from it. In setting the TAC, **the BSAC** thus underlines the need to take into account the socio-economic consequences that a zero advice will have on the fishing industry.

The BSAC is aware of various potential causes of the present situation concerning the eastern Baltic cod. Lack of growth of cod, parasite infections, seal predation and other natural causes, such as the lack of inflow of saline water have been mentioned. These causes also call for action. Some uncertainties with respect to some of them need to be addressed through ICES. Fishing is not the only factor that is having an influence, so the stock cannot be improved by managing the fishing pressure alone. The management measures must be adapted to the observed situation. The quota set by the Council last year was higher than the ICES advice and higher than the BSAC recommendation. The industry is facing a zero TAC advice, which would be devastating for the industry.

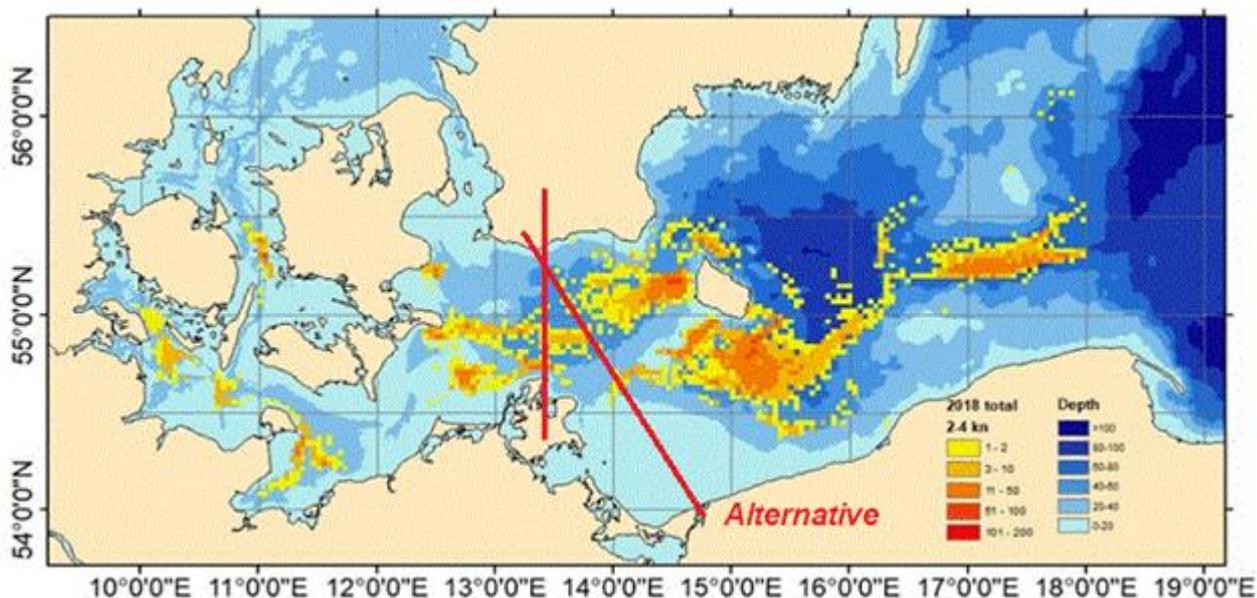
In consequence, **the BSAC** recommends setting the 2020 TAC at 7.233 tonnes, which corresponds to a 70% reduction of the 2019 TAC. This would mean almost stopping the targeted cod fishery, but would allow for a very much needed by-catch of cod in other fisheries, such as flatfish, and some subsistence fishing.

The BSAC draws attention to the fact that inconsistencies in the ICES advice have had an impact on many wrong management decisions in the past. Fishermen will support the work of the scientists by monitoring and providing data. A complete and immediate closure to the eastern cod fishery would exclude fishermen from taking part in essential work to monitor and document the habitat and potential changes, for example of bottom fauna.

In order to obviate the enforcement of a total closure, **the BSAC** understands that the status of the eastern stock calls for additional measures. This means continuing the existing 3-month spawning closure east of Bornholm for both the commercial and recreational fisheries in 2020. However, several fisheries representatives question the effect of spawning closures applied for many years and can only accept them as an extraordinary measure.

With reference to SD 24, where a mixture of western and eastern cod is caught, **the BSAC** draws attention to the fact that cod from the eastern spawning areas is abundant in the eastern parts of the western regulatory area (the eastern part of SD 24). The challenge is then how to enable fishery on the abundant western stock, whilst not fishing too much on the eastern stock, which makes up for the major part of the catches in some fishing grounds. There appears to be a separation between the composition in the western part of SD 24 where cod of eastern origin account for approx. 30% of the catches and the eastern part where eastern cod accounts for approx. 70%. ICES draws a line along 13° E, due to the sampling grid they have used. The fishing industry finds that a line which corresponds better to the natural conditions and takes into consideration the bottom topography should be drawn along 13°30' E. This would help to apply any potential closures in the area where there are high aggregations of eastern cod. **The BSAC** considers this proposal to be an emergency measure. The effects of this change in the boundaries on the composition of the eastern and western cod stocks in SD 24 require scientific evaluation.

This is the map referred to on page 5:



The BSAC does not see the need for a spatial management of the sprat fishery. Moving the sprat fishery to the north would have a severe impact on those vessels that are too small to go to distant fishing grounds and which are becoming increasingly dependent on the sprat. Moreover, there is no clear scientific evidence that the growth of cod depends on sprat, but rather on benthic organisms. Some more scientific research is needed in order to document and evaluate the benefits of such spatial management for cod stocks.

The BSAC also points out that some Member States already apply a 3-month summer closure of the sprat fishery.

The BSAC underlines the need to monitor and evaluate any new or existing measures applied. It recommends a complete long-term approach and the creation of a broad-based crisis council for all involved to address and come forward with a long-term management and in particular a rebuilding strategy for the eastern Baltic cod.

The National Chamber of Fish Producers and the Association of Fishermen's of Sea - PO recommend setting the TAC at 26.071 tonnes (24.767 tonnes for EU TAC), which corresponds to the precautionary approach recommended by ICES in 2018. In accordance with their statement made at the BSAC Working Group meeting (11th-12th June 2019) as well as their statement regarding the emergency measures for cod in 2019, they are of the opinion that apart from socio-economic reasons, there are also other important biological reasons. They highlight the weak population structure, in which the stock consists of many, small (not juvenile), but older individuals. These small cod, which grow considerably slower, will probably never be caught because of the fishing rules which protect small, as well as older fish.

In their opinion, these cod should be caught in order to reduce the pressure on the large individuals from the exploited year classes, which are very important for future generations. From a population perspective, a broader range of year classes should be exploited.

The Darłowska Group of Fish Producers and Shipowners supports the ICES recommendation for a zero TAC, provided that the remainder of the ICES recommendation, i.e. to consider a spatial management plan for the fisheries that catch sprat is adopted, in order to provide cod with sufficient food resources for it to survive. These fisheries should be transferred to the northern areas of the Baltic Sea from 15th April to 15th September. In addition, fishing with gear that can easily be modified by fishermen or which shows species non-selectivity (bottom trawl) should be prohibited until selective tools are developed in order to reduce cod by-catches in directed fisheries of other species, e.g. flounder or plaice.

The group of OIG³ members recommends that the TAC for 2020 should be zero in SDs 25-32 and zero in SD 24 based on the “ICES advice on fishing opportunities”, which states that “ICES advises that when the precautionary approach is applied, there should be zero catch in 2020. This advice applies to all catches from the stock in subdivisions 24–32.” The OIG also recommends the need to use long term measures such as a rebuilding plan.

The group of OIG members notes the following in “issues relevant for the advice”: “At the present low productivity the stock is estimated to remain below B_{lim} in the medium-term (2024), even at no fishing. Furthermore, fishing at any level will target the remaining few commercial sized (≥ 35 cm) cod; this will deteriorate the stock structure further, and reduce its reproductive potential.”

The group of OIG members further recommends restrictions on the sprat fishery in SDs 25-26 in order to redistribute the sprat fishery to the northern areas (SDs 27-29 & 32) to improve the food availability for cod.

BalticSea2020 recommends that a small quota of 1.000 tonnes is allocated to coastal fishermen with boats smaller than 12m, using passive gears.

Herring SDs 22-24

The BSAC takes note that this stock was benchmarked in 2018, and this led to a change in perception of the stock for the entire time series. The 2019 ICES assessment shows a downward revision in the SSB (e.g. 19% smaller for 2017) and upwards revision in F (e.g. 27% higher for 2017) estimates in recent years compared to the 2018 assessment.

³ Coalition Clean Baltic, WWF, Oceana, the Fisheries Secretariat, Finnish Association for Nature Conservation and BalticSea2020

At the same time, **the BSAC** draws attention to the fact that the herring assessed in SDs 20–24 is a complex mixture of populations. Some of these populations seem to be in a much better state. The Rügen herring, which accounts for approximately 50% of the catch, could be coming under pressure from some of the other stocks in the area.

The BSAC recommends a genetic study of the landings, and takes note that this has already been requested at Member State level. Moreover, mixing between WBSS and central Baltic herring in SDs 22–24 may also contribute to uncertainty in the assessment. Thus **the BSAC** cannot agree to set a zero TAC for 2020. **The BSAC** repeats and underlines the need to take into account the socio-economic consequences of a zero advice on the fishing industry.

The BSAC calls for a more sustainable solution for the fish and the fishermen. It also congratulates ICES for providing an overview of several medium-term re-building scenarios for the stock.

The BSAC also takes very seriously the problem that has arisen as a consequence of the revision of the reference points in 2017 and has taken the initiative to work on the rebuilding plan for western Baltic herring. The work is carried out in a focus group. ICES is engaged in this work and has looked into the environmental drivers for the recruitment of the stock. The work on recovery scenarios is underway, with a workshop planned at the beginning of 2020. DTU Aqua has been requested to prepare a genetic study of the stock.

The BSAC recommends that the 2020 TAC for herring in this management area should be a rollover of the 2019 TAC of 9.001 tonnes. A roll over TAC can be defended with the following argument:

Applying a value of $F = 0.1$ (equal to F_{lower} in the MAP and ICES HCR) would result in a catch of 10.359 tonnes and result in a spawning stock biomass of 91.298 tonnes by spring 2021: a 20% increase in SSB. As it is widely recognised that only about 50% of the catch consists of Rügen herring, a total catch of twice that amount will not increase F on the stock. Therefore, more than 20.000 tonnes of herring could be caught in the entire area of abundance and still allow the SSB to increase by 20%. Consequently, as only 50% of the total catch is allocated to the Western Baltic, a rollover of the TAC for herring is likely to lead to an increase in the SSB of the Rügen herring of at least 20%.

The group of OIG⁴ members recommends that the TAC for 2020 should be zero. This is the ICES advice based on the MSY approach. The following details in the ICES advice are noted: the SSB is estimated to be below B_{lim} and has been below B_{lim} since 2007. Fishing mortality (F) has increased since 2014 and remains well above F_{MSY} . Recruitment has been low since the mid-2000s and at an historic low for the last four years.

There are no catch scenarios that will rebuild the stock above B_{lim} by 2021. Even with a closure of the fishery in 2020 it will not be possible to increase SSB above B_{lim} in the short-term (2021). Without additional area and/or time restriction on the herring fishery in the North Sea in 2020, a catch of WBSS in the North Sea will be inevitable (2.164 tonnes in 2018).

⁴ WWF, Oceana, CCB, Fisheries Secretariat, Finnish Association for Nature Conservation and Baltic Sea 2020

Herring SDs 25-29, 32, ex GoR

The **BSAC** recommends that the 2020 EU TAC for herring in the central Baltic management area should be 153.384 tonnes, which is in line with one of the scenarios in the ICES advice (in accordance with the MAP F_{MSY}).

The corresponding TAC in the central Baltic management area for 2020 would be calculated as 173.975 tonnes minus the Russian catch (9.5%) + 314 tonnes – 4.377 tonnes = 153.384 tonnes.

The **fisheries representatives** express their concern with the fact that there has been another revision of the stock size, which is now believed to be 20% lower than last year. This translates into an advice for a lower TAC, whereas the SSB is above the reference points (B_{lim} , B_{pa} , $B_{trigger}$) and the recruitment in recent years had been the highest observed. They underline the uncertainty behind the ICES advice. Moreover, it leads to constant decreases and increases in the TACs, as well in the advice and this is difficult for the fishery to cope with.

The **National Chamber of Fish Producers and the Association of Fishermen's of Sea-PO** recommend setting the 2020 TAC as a rollover of the 2019 TAC (170.360 tonnes for EU). Their fishermen have not experienced any problems in catching herring, apart from the size of the fish, which can be the result of overpopulation and mesh size selectivity policy.

The **group of OIG⁵ members** recommends that the TAC for 2020 should not exceed 153.384 tonnes (F_{MSY}). They recommend that the 2020 TAC should be set in the lower F range i.e. between MSY F_{lower} (114.081 tonnes) and F_{MSY} (153.384 tonnes).

The TAC of 153.384 tonnes is based on ICES advice of F_{MSY} (173.975 tonnes). The lower TAC of 114.081 tonnes is based on ICES MSY F_{lower} figure (130.546 tonnes). From both ICES figures they have deducted an assumed 9.5% Russian share, and then added 314 tonnes for Gulf of Riga herring taken in SD 28.2 and deducted 4.377 tonnes for Central Baltic herring taken in Gulf of Riga (28.1).

This recommendation also takes into consideration the ecosystem-based approach; the dynamics between the stocks of eastern Baltic cod and herring as noted in the ICES advice sheet; the ICES advice that the central Baltic herring biomass is expected to decline in the coming years; and the necessity to limit variations in fishing opportunities between consecutive years.

Herring SD 28.1 Gulf of Riga

The **BSAC** recommends that the 2020 TAC for herring in this management area should be 34.445 tonnes, in accordance with the MAP F_{MSY} . The corresponding TAC in the Gulf of Riga management area for 2020 would be calculated as 30.382 tonnes – 314 tonnes + 4377 tonnes = **34.445 tonnes**.

⁵ WWF, Oceana, CCB, Fisheries Secretariat and Finnish Association for Nature Conservation, BalticSea 2020

Herring SDs 30-31

The BSAC recommends setting the 2020 TAC for herring in this management area at 75.398 tonnes, corresponding to -15% decrease of the 2019 TAC.

The BSAC takes note of the fact that due to the lack of reference points for this stock and hence a proper assessment, ICES recommends setting the TAC on the basis of precautionary approach. Directly applying the ICES precautionary approach will be a drastic reduction for the commercial fisheries. The BSAC repeats its concern about the consequences that these radical changes have on management. Therefore, the BSAC recommended 2020 TAC for this stock is based on a -15% decrease of the previous TAC.

The group of OIG members⁶ recommends that the TAC for 2020 should not exceed 65.018 tonnes, following the ICES precautionary approach advice.

Sprat SDs 22-32

The BSAC recommends setting the total 2020 EU TAC for sprat 230.156 tonnes, corresponding to a 15% decrease of the 2019 TAC. This TAC is within the range recommended by ICES.

The rationale behind this recommendation is that the BSAC notes that the proposal to reduce the TAC is not based on an observed decline in the stock which is above MSY $B_{trigger}$ and the recruitment is high. The ICES advice translates into a TAC reduction of more than 25% as compared to last year. The fact that ICES has now revised the estimate of SSB cannot be a reasonable argument for a considerable reduction in the TAC over just one management year. The BSAC calls for a stable, long term assessment of the stock and strongly recommends that TACs do not vary more than 15% from year to year.

The fisheries representatives question the downward reduction of the SSB. According to their observations, the sprat stock is doing very well. In addition, in some Member States, sprat is protected during spawning by 3-month closures. Sprat is used for human consumption by some Member States and the fishing and processing sectors depend on this TAC for producing popular niche product.

The National Chamber of Fish Producers and the Association of Fishermen's of Sea-PO recommend setting the TAC at the level of 301.125 tonnes, which corresponds to the F_{MSY} recommended for 2019. This corresponds to an EU TAC of 270.772 tonnes (the same as the EU TAC for 2019). They reiterate their surprise at the ICES advice to decrease the total sprat catch. They underline good catches of good quality sprat in SDs 25 and 26, which have been caught by all their fleet segments (approx. 85% utilisation of the Polish 2019 quota). They also underline their strong dependency on the cod stock, which is in a worse state. Further limitation of clupeid (sprat, herring) catches will increase the predation by sprat and herring on the cod eggs and larvae, which may be an important factor hampering cod stock recovery.

⁶ WWF, Oceana, CCB, Fisheries Secretariat and Finnish Association for Nature Conservation, BalticSea 2020

The group of OIG members⁷ recommends that the TAC for 2020 should not exceed 203.027 tonnes (F_{MSY}). The group of OIG members recommends that the TAC should be set in the lower F range i.e. between MSY Flower (152.833 tonnes) and F_{MSY} (203.027 tonnes). The TAC of 203.027 tonnes is based on ICES advice of F_{MSY} (225.786 tonnes). The lower TAC of 152.833 tonnes is based on ICES MSY F_{lower} figure (169.965 tonnes). The assumed Russian share of 10.08% is deducted. This recommendation also takes into consideration the ecosystem-based approach and the dynamics between the stocks of eastern Baltic cod and sprat as noted in the ICES advice.

The group of BSAC OIG members also recommends restrictions on the sprat fishery in SDs 25-26 in order to redistribute the sprat fishery to the northern areas (subdivisions 27-29 & 32) to improve food availability for cod in-line with the ICES advice. The group refers to the following points in the ICES advice: “ICES recommends that a spatial management plan is considered for the fisheries that catch sprat, with the aim to improve the condition of cod stocks. The abundance of cod in subdivisions 25–26 is high compared to other areas in the Baltic, and the condition of these stocks is considered to be limited by food availability. Sprat and herring are important food items for cod (especially sprat), but the present high biomass of the two prey stocks is to large extent distributed outside the distribution area for cod (Figure 3). Any fishery on the two prey species in the main cod distribution area (subdivisions 25– 26) will potentially decrease the local sprat density, which may lead to increased food deprivation for cod (Casini et al., 2016). The relative catch proportion of sprat in the main cod distribution area has since 2010 increased from 37% of the total catch to 56% in 2012–2018.

Thus, restrictions established on sprat fisheries in the main cod distribution area would result in increased availability of clupeid prey, which could benefit the cod stock; however, several other factors also have impact on the cod stock (see ICES, 2019).

Redistribution of the fishery to the northern areas (subdivisions 27–29 and 32) may also reduce the density-dependent effect, i.e. increase the individual growth for the clupeids in the area (Casini et al., 2006).”

Salmon SDs 22-31

The BSAC recommends setting the 2020 TAC for salmon in SDs 22-31 as a rollover of the advice TAC in 2020 at 91.132 individuals.

The BSAC welcomes management initiatives which, according to some fisheries representatives have succeeded in decreasing misreporting.

The group of OIG members recommends that the 2020 TAC should not exceed 58.664 salmon. This is based on ICES advice for the “*reported wanted catch*” of 59.800 salmon, minus an assumed Russian share of 1.9%.

A representative of anglers points out a relatively high mortality of salmon cause by M-74 in some rivers which could have an impact on the smolt production.

⁷ WWF, Oceana, CCB, Fisheries Secretariat, Finnish Association for Nature Conservation and BalticSea 2020

Salmon SD 32

The BSAC recommends that the 2020 TAC for salmon in SD32 is set as a rollover of 9.703 individuals.

The group of OIG⁸ members recommends that the 2020 TAC should not exceed 8.798 salmon. This is based on ICES advice for the “*reported wanted catch*” of 9.700 salmon, minus an assumed Russian share of 9.3%.

Plaice in SDs 22-32

The basis for the ICES advice is the precautionary approach for both of the two stocks that are covered by the TAC for plaice in Subdivisions 22-32, as requested by the European Commission.

For the larger of the two stocks (in SDs 21-23) the precautionary advice is a catch of 10.636 tonnes in the whole area, which translates to 7.626 tonnes in the Baltic part of the area, based on traditional allocation of effort between Kattegat and the Baltic. ICES describes this as a reduction compared to last year’s advice, but this is only driven by the revision of stock size. The stock is estimated to have doubled its biomass over the last two years.

To this amount must be added 2.826 tonnes from the stock in SDs 24-32. ICES has changed the basis for calculating the catch advice for this stock. This change has had the consequence that for a stock estimated to have doubled over the last two years, the catch advice is reduced by 24% compared to that of last year.

The BSAC recommends setting the 2020 TAC for plaice in SDs 22-32 at 10.452 tonnes. The justification for this is that both stocks (SDs 21-23 and SDs 22-32) are increasing and the fishermen are, depending on market conditions, taking advantage of this fishery.

The group of OIG members⁹ recommends that the TAC for 2020 should not exceed 6.895 tonnes. This is based on the ICES F_{MSY} catch scenario for plaice in SDs 21-31 and ICES precautionary approach advice for plaice in SDs 24-32. This recommendation is in accordance with CFP requirements and Article 2(2) of the Basic Regulation. The CFP requires the MSY approach to be followed for all stocks when there is sufficient data and adequate scientific information to manage this stock according to the MSY.

⁸ WWF, Oceana, CCB, Fisheries Secretariat, Finnish Association for Nature Conservation and BalticSea2020

⁹ WWF, Oceana, CCB, Fisheries Secretaria, Finnish Association for Nature Conservation and BalticSea2020

The group of BSAC OIG members¹⁰ does not understand why the European Commission has again this year asked ICES for advice based on the precautionary approach (i.e. $F=F_{p05}$) for plaice in SDs 21-23. The members note that in 2018, despite having asked for precautionary approach advice, the Commission proposed the TAC based on the F_{MSY} advice for plaice in SDs 21-31 and this was subsequently agreed by the Council.

The members also note the likelihood of significant by-catches of eastern Baltic cod when catching plaice in SDs 24-26. They also highlight that it is likely that a review of this TAC will be required in line with both emergency measures and a long-term rebuilding plan for eastern Baltic cod.

¹⁰ WWF, Oceana, CCB, Fisheries Secretariat, Finnish Association for Nature Conservation and BalticSea2020