



To EFCA
Att. Miguel Nuevo
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cc. BSAC Management Team

Ref: BSAC/2021-2022/37

Copenhagen Thursday 17th February 2022

RE: BALTFISH / BSAC / EFCA joint WORKSHOP on monitoring, control, and enforcement of the Landing Obligation 7th March 2022

EFCA have asked for input from the BSAC to the agenda point 6: Main issues in relation to the implementation of the LO.

Input from BSAC members (updated 17.2.22)

OIG members Coalition Clean Baltic and WWF and European Anglers Alliance

These members have expressed a strong wish to look at the salmon control issues more deeply and in particular with key Member States involved (SE and FI).

We hope that Member States are informed in advance so they can prepare answers to the questions raised and add to whatever information EFCA can provide.

Follow-up on salmon is a very important topic. Delegated Regulation 2021/1417 allowing derogation [for salmon] from the LO is in place and valid during 2021.¹ However, the derogation has a time limitation written into it and must be followed up no later than 1st May 2023 by the MS with interest providing data mortality (see Article 4 of the Regulation: "*By 1 May 2023, Member States having a direct management interest shall submit to the Commission additional scientific information allowing an assessment of the representativeness and quality of the discard survival estimate of salmon caught with pound nets and pontoon traps equipped with an attached knot-less bag, including information on the post-release mortality.*")

We must assume that control of the provisions of this derogation and the actual numbers of released salmon are part of this important follow up. It is thus highly relevant to ask EFCA to explain how it works and will work leading up to 2023 and in what ways control will help to ensure that. Such data and understanding may also be crucial for science in the search for reasons behind the seemingly increasing numbers of dead salmon in rivers. It may well be that post release mortality is partly behind the "alarming reports" that show up in the

¹ Com Del Reg 2021/1417 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1417&from=EN>

media. Since the salmon fishery is now basically a Swedish-Finnish affair, control and playing by the rules will be of massive interest and scrutiny from all other Baltic states.

Finland adopted ITQs for salmon fisheries and pelagics in 2017. At the same time, it was made mandatory to tag all the landed salmon with an individual landing mark which shows the name and the identification number of the quota holder. We find that this has been a major improvement in controlling the landings and obviously we would like to see such a system in place for all the salmon fisheries across the Baltic Sea. Also ICES (2021) has estimated that “rate of unreporting of catches is considered to have decrease to a very low magnitude as a consequence of the recent developments in the fishing regulations. In 2017, an individual quota system was initiated and since then also all landed salmon have had to carry a landing mark which probably steers to a careful catch reporting.” I would find it very interesting to hear from EFCA how they find this system, and do they see that this would decrease the risk of un- and misreported salmon catch?

However, some fishermen don't have any salmon quota or have a very little quota, which means that they might be urged to release salmon that is caught as by-catch in other fisheries (mainly targeting European whitefish). This was also one of the reasons (probably the main reason) why Finland wanted to have the derogation from the LO. To my knowledge there are no reports or data published on the amount of released/discarded (other than seal damaged) salmon in the Gulf of Bothnia and Gulf of Finland trapnet fishery. Thus, referring to the message from CCB, it would be important to know whether this has been monitored and controlled, and what is the outcome so far?

The European Fishmeal and Fish Oil Producers

They inform that Peter Kongerslev from FF Skagen² is willing to give a presentation on how landings of fish are dealt with in Danish ports in terms of sampling fish, weighing and control.

This could go under agenda Item 7: REM as a tool for improving compliance with the LO (EFCA – DG MARE).

FF Skagen (Fishmeal and Oil) and Scandic Pelagic (herring for human consumption) have been working on video monitoring of pelagic landings. They have used a certified third party (in Danish: Vejer & Måler) for weighing and control of species. The work is monitored continuously by means of video cameras. Video messaging is sent to the monitoring company and is shown live at the local fisheries inspectorate. The third party doing the work is the company Skawinspection. FF Skagen and Scandic Pelagic have asked Skawinspection to provide a description of what they do when fish is landed. Fish is supplied to the factories in several ways. One example is where the fish is landed in Hanstholm and is weighed from the offices of SkawInspection in Skagen. Background attached. ./.

This could be an interesting presentation – which we commend to EFCA for the meeting.

We take note from EFCA that the issue with pelagic landings is not fully in line with the focus of the Workshop, but that EFCA will consult with BALTFISH MS and get their views. The BALTFISH CEG will have a meeting next week (w/c 21.2.22) to discuss these and to agree on a final agenda.

² <https://ffskagen.dk/en>

From the Pelagic Working Group chair Jarek Zielinski

The WG Chair asks EFCA to give its evaluation on compliance of the Baltic pelagic fisheries with the landing obligation and to inform if there are any points or issues that need highlighting. He will be holding a Pelagic WG on 14th March 2022³ and one agenda point is follow-up to the Joint BALTFISH-EFCA-BSAC Workshop (7th March 2022) - compliance of the pelagic fishery with the landing obligation.

³ <http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Pelagic-WG>