

## BSAC recommendations for the fishery in the Baltic Sea in 2024

The BSAC recommends setting the catch levels for the Baltic stocks in 2024 at the values indicated in the table below. For divergent positions, a list of members subscribing to the specific minority position is indicated as a footnote. For all stocks, the recommendations are formulated and agreed after careful consideration of the scientific advice.

| Stock                | ICES advice on fishing opportunities 2024 <sup>1</sup>                                     |                        | BSAC recommendation for EU TAC 2024   | BSAC minority positions TAC 2024   |
|----------------------|--|------------------------|---|--|
| <b>Cod SDs 22-24</b> | <b>24 t</b><br>(commercial and recreational catches)<br>(-97% compared to previous advice) | Precautionary approach | <b>Bycatch TAC 489 t (roll-over of 2023 TAC) to allow other fisheries to continue.</b><br><b>Additional recreational catches limited to 1 bag</b> | <b>Due to the degraded state of the stock and high uncertainties some members of the OIG<sup>2</sup> cannot provide a quantitative catch recommendation, but commercial targeted fisheries should remain closed, and all recreational fishing should be prohibited.</b><br><b>Bycatch quota of 489t for fishers who use passive gears only<sup>3</sup>.</b><br><b>Recreational fishing opportunities for cod must be preserved<sup>4</sup></b><br><b>Due to the important gaps in ICES assessment and advice, some members cannot support any quantitative advice in order not to legitimise it.<sup>5</sup></b> |
| <b>Cod SDs 25-32</b> | <b>0 t</b><br>(roll-over of the advice)  | Precautionary approach | <b>Bycatch TAC 595 t (roll-over of 2023 bycatch TAC) to allow other fisheries to continue</b>   | <b>0 t<sup>6</sup></b><br><b>Bycatch quota of 595 t for fishers who use passive gears only<sup>7</sup></b><br><b>Due to the important gaps in ICES assessment and advice, some members cannot support any quantitative advice in order</b>   |

<sup>1</sup> 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.

<sup>2</sup> Coalition Clean Baltic (CCB), WWF Finland, BalticWaters, Fisheries Secretariat (FishSec)

<sup>3</sup> Low Impact Fishers of Europe (LIFE), Darłowska Group of Fish Producers & Shipowners (Darłowska Group), Fishermen's Federation for Small-Scale Fishery in Sweden (SYEF), Association for Low Impact Coastal Fishery PO (FSKPO)

<sup>4</sup> European Anglers Alliance (EAA)

<sup>5</sup> National Chamber of Fish Producers, Association of Fishermen of Sea PO

<sup>6</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>7</sup> LIFE, Darłowska Group, SYEF, FSKPO

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|-------------------------------------|---|--|--|---|
|                                     |   |  |  | not to legitimise it. <sup>8</sup>  |
| <b>Plaice SDs 22-32</b>             | <b>SD 21-23: 17.254 t</b><br><b>SD 24-32: 4.481 t</b><br>(+ 45% compared to previous advice)<br><br><b>SD 22-32: 17.947 t</b> | SD 21-23: MSY approach<br>SD 24-32: MSY approach | <b>17.947 t</b>  | <b>Prioritise protection and recovery of both Baltic cod stocks by setting plaice TAC well below single-stock headline advice and in no event allowing the fishing level to increase (<math>\leq 7,727</math> t)<sup>9</sup></b><br><b>7,727 tonnes (passive gears only)<sup>10</sup></b> |
| <b>Herring SDs 30-31</b>            | <b>Range 48.824 t - 63.049 t</b><br>(-21% and -26% compared to previous advice)   | EU multiannual plan (MAP) for the Baltic Sea     | <b>80.463 t (<math>F_{msy}</math> upper)</b> in view of some signs of positive stock development and in order to avoid too drastic decrease of the TAC | <b>Due to the degraded state of the stock and high uncertainties some members of the OIG<sup>11</sup> cannot provide a quantitative catch recommendation, but fishing pressure should be minimised.</b><br><b>12,610 t (<math>0.2 F_{MSY}</math>)<sup>12</sup></b>                        |
| <b>Herring Gulf of Riga SD 28.1</b> | <b>Range 27.696 t - 41.370 t</b><br>(-17% compared to previous advice)  | EU multiannual plan (MAP) for the Baltic Sea     | <b>37,953 t</b><br>(calculation for the management area based on MAP $F_{MSY}$ )   | $\leq 37,959$ t <sup>13</sup><br><b>27,696 (<math>F_{MSY}</math> lower)<sup>14</sup></b>  |

<sup>8</sup> National Chamber of Fish Producers, Association of Fishermen of Sea PO

<sup>9</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>10</sup> LIFE, Darłowska Group, SYEF, FSKPO

<sup>11</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>12</sup> LIFE, Darłowska Group, SYEF

<sup>13</sup> CCB, WWF Finland, FishSec, EAA

<sup>14</sup> LIFE, BalticWaters, Darłowska Group, SYEF

|  |   |  |   |  |
|--|---|--|---|--|
| <p><b>Herring SDs<br/>25-29,31</b></p> | <p><b>Range 41.706 t -<br/>52.549 t</b><br/><br/><b>(-41% and -45%<br/>compared to previous<br/>advice)</b></p> | <p>EU multiannual<br/>plan (MAP)</p>                             | <p>EU TAC of <b>52,549 t</b> – 9.5% of the Russian share, + 902 t for Gulf of Riga herring to be taken in SD 28.2 and - 2,959 t for Central Baltic herring to be taken in the Gulf of Riga (SD 28.1) = <b>45,500 (MAP F<sub>MSY</sub>)</b></p> <p>In accordance with the MAP F<sub>MSY</sub> scenario in the ICES advice, allowing for an increase in SSB</p> | <p><b>Due to the degraded state of the stock and high uncertainties some members of the OIG<sup>15</sup> cannot provide a quantitative catch recommendation, but fishing pressure should be minimised.</b></p> <p><b>35,687 t EU TAC Russian share deducted (F<sub>MSY</sub> lower)<sup>16</sup></b></p> <p><b>116,775 t<sup>17</sup></b></p> <p><b>Due to the important gaps in ICES assessment and advice, some members cannot support any quantitative advice in order not to legitimise it.<sup>18</sup></b></p> |
| <p><b>Herring SDs<br/>22-24</b></p>    | <p><b>0 t</b></p>   | <p>MSY approach<br/>and<br/>precautionary<br/>considerations</p> | <p><b>F<sub>2023</sub> corresponding to a TAC of 788 t<br/>allowing for an SSB increase</b></p>   | <p><b>0 t<sup>19</sup></b></p> <p><b>Implement additional measures to protect and restore known spawning habitats and nursery areas, as indicated in the ICES advice.</b></p> <p><b>788 t (passive gears only)<sup>20</sup></b></p> <p><b>Due to the important gaps in ICES assessment and advice, some members cannot support any quantitative advice in order not to legitimise it.<sup>21</sup></b></p>   |

<sup>15</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>16</sup> LIFE, Darłowska Group, SYEF

<sup>17</sup> Fish Producers' Organisation Bałtyk

<sup>18</sup> National Chamber of Fish Producers, Association of Fishermen of Sea PO

<sup>19</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>20</sup> LIFE, Darłowska Group, SYEF, FSKPO

|                         |   |   |   |   |
|-------------------------|---|---|---|---|
| <b>Sprat SDs 22-32</b>  | <b>Range</b><br><b>191 075 t - 247 704 t</b><br><b>(+4% and – 3.1%</b><br><b>compared to previous</b><br><b>advice)</b>               | EU multiannual plan (MAP) for the Baltic Sea  | <b>247,704 t (<math>F_{msy}</math> upper)</b><br><b>EU TAC (-Russian share 10.08%) =</b><br><b>222,735 t</b><br><br>Allowing for a SSB increase and taking into account species interaction considerations. | <b>Due to the mixing with the degraded herring stocks in the central Baltic some members of the OIG<sup>22</sup> cannot provide a quantitative catch recommendation, but the TAC should be set below the lower end of the <math>F_{MSY}</math> range (<math>\leq 171,815</math> t).</b><br><br><b>62,559 t (50% larger than central Baltic herring) = EU TAC of 56,253 t<sup>23</sup></b> |
| <b>Salmon SDs 22-31</b> | <b>ZERO CATCH</b><br>Total sea catch $\leq 60$ 000 salmon if confined to existing coastal fisheries in May-August in SD31 (roll-over) | ICES evaluated last year's advice of zero catch and advised according to best scientific advice | <b>Do not recommend setting a zero TAC for salmon in the mixed-stock sea fisheries in SDs 22-30.</b>  | <b>0 in mixed stock fisheries at sea (22-30); <math>\leq 56,640</math> salmon in total catches recreational and commercial combined<sup>24</sup></b><br><br>A bag limit of one salmon (excluding recent spawners) per angler and day for sea anglers south of latitude 59.30 N. <sup>25</sup>   |
| <b>Salmon SD 32</b>     | <b>11,800 salmon</b><br><b>(roll-over of the advice)</b>  | Roll over of 2022 advice  | <b>11,800 salmon</b>  | <b><math>\leq 9,160</math> salmon<sup>26</sup></b>  |

Comments on sea trout are also provided at the end of the document (the stock is not managed by an EU TAC).

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

<sup>21</sup> National Chamber of Fish Producers, Association of Fishermen of Sea PO

<sup>22</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>23</sup> LIFE, Darłowska Group, SYEF

<sup>24</sup> CCB, WWF Finland, FishSec

<sup>25</sup> EAA

<sup>26</sup> CCB, WWF Finland, FishSec, EAA

## **General comments to the ICES advice for the fishery in the Baltic Sea in 2024**

The recommendations presented here have been developed during and after the presentation of the ICES advice by ICES Vice-Chair of ACOM, Dorleta Garcia, and the following discussions, at the Joint Working Group held on 13<sup>th</sup> - 14<sup>th</sup> June 2023. A draft was sent for written input to the Working Group members and the Executive Committee members and was finalised by the Executive Committee on 29<sup>th</sup> June 2023. The recommendations were approved by fast-track written procedure on 7<sup>th</sup> July 2023.

**The BSAC acknowledges** that the fishery in the Baltic is severely challenged. In addition to the threats to the marine environment posed by climate change, the fisheries sector has also been dealing with a series of major challenges, most recently, the repercussions of the war in Ukraine have already significantly disrupted the fishery and the fish market in the Baltic and resulted in high fuel prices, logistic issues and disruptions in market supplies.

**The BSAC agrees** on the continued need to focus on the overall ecosystem, and the other factors that are affecting the well-being of certain fish stocks. Fishing is just one of the factors that are having an influence on the stocks. Several other challenging developments affect the Baltic ecosystem.

In May 2023, the BSAC organised the workshop on the Multiannual Plan for the Baltic (MAP) to discuss and hear the stakeholders views 7 years after the adoption of the plan and 3 years after its first evaluation. The meeting concluded, among others, that there is a need to revise the MAP in view of the current state of the fish stocks, in order to adjust it to the on-going changes in the ecosystem. The BSAC decided to organise a follow-up meeting on the Baltic MAP in the near future.

### **Scientific advice**

**The BSAC is of the opinion** that the process of developing and providing advice can be further improved. The advice from science is the basis for supporting and establishing the quality and appropriateness of management decisions, and to enable fishers to optimise the output of their efforts.

**The BSAC agrees** that the current system of scientific advice should include more options and include an explanation of the consequences of each option. The advice should also reflect the changes in the ecosystem. There is an obvious need for better understanding of relevant processes, including predation, consequences of climate change, regime shift etc. and their impact on productivity of the ecosystem. ICES has drawn attention to a knowledge gap on mixed fisheries in relation to cod, plaice, sprat, and herring. More research should be carried out by national scientific institutes in the Baltic Member States to better understand the Baltic ecosystem. The BSAC will work on that topic in September 2023 at the occasion of the working groups meetings.

**The BSAC repeats and underlines** that dialogue and co-operation between scientists and fishers is very important and facilitates carrying out effective data collection programmes. The BSAC acknowledges that catch misreporting is a serious issue that undermines the quality of scientific advice and highlights the need for the accuracy of catch data to be improved.

**The BSAC will organise a workshop** in early 2024 to present additional scientific information that could be useful to managers when discussing TAC setting.

## Factors affecting the fish stocks

**There is agreement in the BSAC** on the continued need to focus on the overall ecosystem, and the other factors that are affecting the well-being of certain stocks. Fishing is one of the factors that is having an influence on the stocks. Several other challenging developments are occurring at the same time, among other species interaction and climate change. **The BSAC welcomes** the fact that ICES advice includes a chapter on conservation status for some stocks in order to deliver ecosystem-based management options. **The BSAC is of the opinion** that estimation and quantification of the effects of species interactions need to be undertaken urgently.

The BSAC will organise a workshop on predators (cormorants and seals) on the 27<sup>th</sup> October 2023 to present the status of these species, legal considerations and current management.

## Selectivity in the fisheries

The limited commercial fishing opportunities for both Baltic cod stocks brought into focus the imperative need to use technical solutions to reduce the catch of cod whilst continuing fisheries for stocks that have good status.

**The BSAC** will provide input to the consultation of the legal Acts introducing a new mandatory trawl gear device in a separate letter addressed to DG Mare<sup>27</sup>.

**The BSAC recommends** evaluating the effectiveness of all the measures to protect cod spawning areas. Allowing for a thorough evaluation will require specifically to look at cod spawning areas and depth at which the measures are applied in the Baltic. The BSAC has agreed on a specific letter to the Commission on this topic.<sup>28</sup>

## Cod SDs 22-24

**The BSAC recommends** that the 2024 TAC for cod in SDs 22-24 should be a rollover of the 2023 bycatch TAC of **489 tonnes** (commercial catches) and additional recreational catches limited to 1 bag per angler per fishing day. Whilst recognising that cod catches should be kept as low as possible, the BSAC does not consider the bycatch TAC recommended by ICES to be realistic. It is a logical decision to continue to allow some cod to be caught in order to enable other fisheries to continue.

**The BSAC recommends** evaluating the effectiveness of all the measures to protect cod spawning areas. Allowing for a thorough evaluation will require specifically to look at cod spawning areas and depth at which the measures are applied in the Baltic. The BSAC has agreed on a specific letter to the Commission on this topic.<sup>29</sup> **The BSAC takes note** that ICES has provided advice for cod in SDs 22-24 for 2024 and 2025. However, **the BSAC asks** the European Commission to request ICES to provide an updated assessment and advice on western cod stock also in 2024 (advice for 2025), in order to take account of any new developments of this stock.

**Some Polish fisheries organisations**<sup>30</sup> do not support the ICES advice for the western cod stock. In their view, the advice does not reflect all factors and changes affecting the stock, such as

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<sup>27</sup> [BSAC recommendations on the legal Acts introducing a new mandatory trawl gear device, BSAC/2023-2024/13](#)

<sup>28</sup> [BSAC recommendation on the effectiveness of cod spawning area protection measures, BSAC/2023-2024/11](#)

<sup>29</sup> [BSAC recommendation on the effectiveness of cod spawning area protection measures, BSAC/2023-2024/11](#)

<sup>30</sup> National Chamber of Fish Producers, Association of Fishermen of Sea PO

the population structure and interspecies dependence. In their view, inconsistencies in age interpretation have become increasingly problematic, prevent the estimation of fish growth and hamper adequate management advice. This has consequences both for stock assessment and fisheries management. They point to the fact that ICES did not include data from a research project<sup>31</sup> that had delivered information on cod growth and age structure through a tagging programme. Such approach leads to protecting the weakest cod individuals, thus making the population structure weaker. This has been confirmed by high natural mortality which is strongly related to age and density of individuals.

**Another Polish fisheries organisation**<sup>32</sup> also agrees with the shortcomings in the ICES advice and proposes to set the TAC for cod in SDs 22-24 as a rollover of the 2023 TAC. They advise to allow the bycatch TAC to be taken by all allowable fishing gears.

**Some small-scale fisheries representatives**<sup>33</sup> support the rollover of the 2023 TAC for western cod (489 tonnes), on the condition that the quota is allocated to fishers who use passive gears, in order to preserve the stock following the first good recruitment since 2016. They draw attention to the high discard rates of cod in trawl fishery just under 40% of catches, in the mixed cod/plaice trawl fishery<sup>34</sup>.

**A group of OIG members**<sup>35</sup> recommends that the TAC for 2024 should be set at zero for all targeted cod fishing in SDs 22-24. Due to the degraded state of the stock and high uncertainties they cannot provide a quantitative catch recommendation, but commercial targeted fisheries on western Baltic cod should remain closed, and all recreational fishing should be prohibited. They recommend scientific advice on the changed spawning period, call for an increase at-sea monitoring and control on all vessels using active gears in all areas but prioritised in cod concentration areas, combining both REM and traditional controls and setting the plaice TAC well below the respective single-stock headline advice in order to prioritise cod.

**The representatives of recreational anglers**<sup>36</sup> recommend preserving the recreational fishing opportunities for cod in 2024. They also recommend alternative management measures which further lower the recreational catch: e.g. increased minimum landing size, a maximum landing size to protect the biggest cod and combine both with seasonal closures and bag limits, targeted management of recreational fishing, intensification of the dialogue between the interest groups, science, and politics. They recommend no dedicated fishing activities on spawning cod, improvement and obligatory use of selective gear to reduce bycatch of cod in commercial fisheries and investigating the impact of cormorant predation on cod stocks.

## **Cod SDs 25-32**

**The BSAC recommends** a bycatch quota of **595 t** to allow fishing for other species should be set, in order to give some opportunities for targeting other species. In their opinion, more research on environmental and predator impacts (such as seals, including the parasite load, and cormorants) on the recovery of cod stock is needed.

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<sup>31</sup> TABACOD <https://tabacod.dtu.dk/>

<sup>32</sup> Fish Producers' Organisation Bałtyk

<sup>33</sup> LIFE, Darłowska Group, SYEF, FSKPO

<sup>34</sup> ICES (2023). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.23123768.v2>

<sup>35</sup> CCB, WWF Finland, BalticWaters, FishSec

<sup>36</sup> European Anglers Alliance (EAA), including Deutscher Angelfischerverband (DAFV), see their position paper at [Western Baltic cod - 2023 - Positions - EAA \(eaa-europe.org\)](https://www.eaa-europe.org/)

**The BSAC recognises** that the poor status of the eastern Baltic cod has been largely driven by biological changes in the stock during the last decades. Natural mortality has increased and is estimated to be considerably higher than the fishing mortality in recent years.

**The BSAC highlights** the fact that the directed commercial fishery for eastern Baltic cod has been closed since July 2019. No significant improvement to the state of the stock has been subsequently observed. The BSAC emphasises the need for further efforts to stimulate cod recovery in order for fishers to access this commercially and ecologically valuable stock.

**The BSAC underlines** the need to improve the process of developing and providing advice, in order to support appropriate management decisions. **The BSAC agrees** that the current system of scientific advice should include more options and include an explanation of the consequences of each option. The advice should also reflect the changes in the ecosystem. The data on species interaction should be used in the advice. If needed, more funding should be provided to research institutes in the Baltic Member States to carry out studies to better understand the Baltic ecosystem.

**The BSAC is in consensus on the need to** evaluate the effectiveness of all the measures to protect cod spawning areas. Allowing for a thorough evaluation will require specifically to look at cod spawning areas and depth at which the measures are applied in the Baltic. The BSAC has agreed on a specific letter to the Commission on this topic.<sup>37</sup>

**Some fisheries representatives**<sup>38</sup> underline that there are no positive results to show for the cod population from the summer closure, which therefore seems entirely disproportionate. They underline that fishing mortality has a negligible effect on the current low status of the eastern cod stock. The low growth, poor condition, and high natural mortality of cod are related to the changes in the ecosystem.

**Some Polish fisheries organisations**<sup>39</sup> do not support the ICES advice for the eastern cod stock and are not ready to make any proposal for a TAC. Similarly to the advice for western cod, in their view, the advice does not reflect all factors and changes affecting the stock, such as the population structure and interspecies dependence. Inconsistencies in age interpretation have become increasingly problematic and prevent the estimation of fish growth. This has consequences both for stock assessment and fisheries management. They point to the fact that ICES did not include data from a research project<sup>40</sup> that had delivered information on cod growth and age structure. Such approach leads to protecting the weakest cod individuals, thus making the population structure weaker. With relation to both stocks of cod, they are of the opinion that cod are much older than scientists tell us, and consequently management measures for older fish should be different.

**Another Polish fisheries organisation**<sup>41</sup> also agrees with the shortcomings in the ICES advice and proposes to set the bycatch TAC for cod in SDs 25-32 as a rollover of the 2023 TAC. They advise to allow the bycatch TAC to be taken by all allowable fishing gears.

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<sup>37</sup> [BSAC recommendation on the effectiveness of cod spawning area protection measures, BSAC/2023-2024/11](#)

<sup>38</sup> DFPO, DPPO, Swedish Pelagic Federation (SPF), Swedish Fishermen PO (SFPO), Union of German Cutter Fishery.

<sup>39</sup> National Chamber of Fish Producers, Association of Fishermen of Sea PO

<sup>40</sup> TABACOD <https://tabacod.dtu.dk/>

<sup>41</sup> Fish Producers' Organisation Bałtyk



**Some small-scale fisheries representatives**<sup>42</sup> support a rollover of the 2023 TAC for eastern cod (595 tonnes), on the condition that the quota is allocated to fishers who use passive gears as this will allow the plaice quota in the mixed fishery to be maximised.

**A group of OIG members**<sup>43</sup> recommends combining a **zero TAC** with increased monitoring and control on all vessels using active gear in all areas but prioritised in cod concentration areas, combining both REM and traditional controls, setting the plaice TAC well below the respective single-stock headline advice in order to prioritise cod protection and recovery and continuing with recreational measures agreed for 2023.

### **Plaice in SDs 22-32**

**The BSAC** recommends setting the 2024 TAC for plaice in SDs 22-32 in accordance with the ICES MSY approach at **17,947 tonnes**.

This is based on the ICES  $F_{MSY}$  catch scenario for plaice in SDs 21-23 and in SDs 24-32<sup>44</sup>.

**The BSAC repeats** its request to modify the legal texts on the implementation of selective gears. The text should allow to open up the possibility to use the new gears while postponing their mandatory use by at least one year, to allow for testing and adapting the gear to different areas and to different vessels (see the BSAC response to the Commission Consultation)<sup>45</sup>. Given the continued positive development of the plaice stock in SDs 21-23, a realistic quota must be set for this stock, sufficiently high to allow exploitation of this abundant resource.

**Some small-scale fisheries representatives**<sup>46</sup> recommend setting the TAC at 7,727 t and that the plaice fishery should be conducted only with passive gears. If this TAC were landed it would represent the highest landings since 1983. A passive gear only fishery will allow for a successful implementation of the landing obligation and improve the likelihood of cod recovery due to a significant reduction in discarding and unaccounted mortality while also ensuring protection for the strong incoming western Baltic cod year class.

**A Polish fisheries organisation**<sup>47</sup> advises to allow the TAC to be taken by all allowable fishing gears.

**A group of OIG members**<sup>48</sup> recommends prioritising protection and recovery of eastern and western Baltic cod by setting plaice TAC well below single-stock headline advice and in no event allowing the fishing level to increase ( $\leq 7,727 \text{ t}$ <sup>49</sup>). In order to minimise the bycatch impact on cod it should be set even lower. The plaice advice does not reflect the impact on cod bycatch. Given the dire state of both Baltic cod stocks, the large increase in the single-stock headline advice for plaice must therefore not be taken. In order to inform the setting of a plaice-TAC going forward that does not jeopardise the recovery of the depleted cod stocks, ICES should be requested to provide the relevant mixed fisheries considerations.

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<sup>42</sup> LIFE, Dařowska Group, SYEF, FSKPO

<sup>43</sup> CCB, WWF Finland, BalticWaters, Fish Sec, EAA

<sup>44</sup> ICES advice for plaice in subdivisions 24–32, p.3

<sup>45</sup> Will be published on the 7<sup>th</sup> July 2023 and available on the BSAC website.

<sup>46</sup> LIFE, Dařowska Group, SYEF, FSKPO

<sup>47</sup> Fish Producers' Organisation Bařtyk

<sup>48</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>49</sup> ICES, 2023. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.21820533.v1>

## Herring SDs 30-31

The **BSAC recommends** to set the TAC for herring in SDs 30-31 at **80,463 t** ( $F_{MSY}$  upper), in view of some signs of positive stock development and in order to avoid too drastic decrease of the TAC from one year to another.

Due to the degraded state of the stock and high uncertainties, **a group of OIG members<sup>50</sup>** does not provide a quantitative catch recommendation, but **fishing pressure should be minimised**. While the ICES headline advice is based on  $F_{MSY} \times SSB(2024)/B_{trigger}$ , the ICES WGBFAS report states that “*F = 0 should be considered as basis for the advice*”<sup>51</sup>, suggesting a zero catch. In its advice, ICES recognises that “*Even a zero catch in 2024 will not ensure that the probability of SSB falling below Blim in 2025 will be reduced to less than 5%.*”, as required by Article 4(6) of the Baltic MAP (see ICES 2023)<sup>52</sup>. Any higher TAC would therefore not be in line with the Baltic MAP. If however a non-zero TAC is nonetheless adopted, this should be limited to a small allowance reserved exclusively for low-impact coastal fishers. They urgently request scientific advice on spatial and temporal measures.

**Some small-scale fisheries representatives<sup>53</sup>** recommend setting the TAC for this stock at **12,610 t** ( $F_{MSY} = 0.2$ )<sup>54</sup>. A precautionary TAC is further recommended as the ICES advice drafting group has referred the stock assessment to WKNEWREF, the Working Group on Reference Points, due to concerns over the fishing mortality reference points currently used in the model.

## Herring SD 28.1 Gulf of Riga

The **BSAC recommends** that the 2024 TAC for Gulf of Riga herring should be set at **35,902 tonnes**, following the ICES MSY approach (also equal to MAP  $F_{MSY}$ ). The corresponding TAC in the Gulf of Riga management area for 2024 would be calculated as 35,902 tonnes - 902 tonnes + 2 959 tonnes = **37,953 tonnes**.

The **Latvian fishers<sup>55</sup>** recommend a rollover of the 2023 TAC. They do not consider a 17% reduction in the TAC advice for 2024 for this stock necessary. To date, Latvian fishers have caught almost 80% of their 2023 TAC allocation. They draw attention to the fact that the impact of seals on fisheries in the Gulf of Riga needs to be evaluated. Fishers are compensated for the damages caused by the seals, but this does not reduce their impact.

**A group of OIG members<sup>56</sup>** recommend setting the TAC for herring in the Gulf of Riga at **≤ 37,959 t (lower  $F_{MSY}$  range 29,753 t - 37,969 t)** in order to build ecosystem resilience by allowing the stock biomass to increase more substantially.

**Some small-scale fisheries representatives<sup>57</sup>** recommend setting the TAC for this stock at **27,696 t** ( $F_{MSY}$  lower), in order to allow stock biomass to increase and build ecosystem as this is the

<sup>50</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>51</sup> ICES, 2023. Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. 5:58. 606 pp.

<https://doi.org/10.17895/ices.pub.23123768>

<sup>52</sup> ICES, 2023. Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. 5:58. 606 pp.

<https://doi.org/10.17895/ices.pub.23123768>

<sup>53</sup> LIFE, Darłowska Group, SYEF

<sup>54</sup> This is based on the research from SLU Aqua who provided an analysis of how quota setting at different levels of  $F_{MSY}$  in the Gulf of Bothnia herring fishery can influence the age and size distribution of the stock.

Beställning storleksstruktur strömming i Bottniska viken (SD 30-31),

<https://www.slu.se/globalassets/ew/org/inst/aqua/externwebb/radgivning/faq-sillstromming/storleksstruktur-stromming3031-pm-220914.pdf>

<sup>55</sup> Latvian Fisheries Association

<sup>56</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

only recommendation that is expected to maintain SSB above  $2MSY B_{trigger}$ . Having a spawning stock biomass that is at least double  $MSY B_{trigger}$  provides a sufficient buffer that best ensures the socioeconomic and ecological success of a commercial fishery.

### **Herring SDs 25-29, 32, ex GoR**

**The BSAC recommends** that the 2024 TAC for herring in the central Baltic management area should be **52,549 tonnes**, which is in accordance with the MAP  $F_{MSY}$  scenario in the ICES advice, allowing for an increase in SSB.

The corresponding **EU TAC** in the central Baltic management area for 2024 would be calculated as<sup>58</sup>: 52,549 tonnes + 902 tonnes – 2,959 tonnes = **45,500 tonnes (MAP  $F_{MSY}$ )**.

**The BSAC takes note** of the downward revision of SSB and upward revision of fishing mortality for central Baltic herring as a result of an inter-benchmark assessment in 2023 and as a consequence the advised reduction in the advised TAC for 2024 (-45% in  $F_{MSY}$ ). **The BSAC repeats** its concern about the consequences that such radical changes have on management. **Some fisheries representatives** express their reservations with regard to the use of  $B_0$ , defined as the unexploited SSB at current conditions in the assessment and take note of the uncertainty presented by ICES regarding the estimation of new reference points recalling that the SSB has been stable for many years. However, other fishery representatives for the small-scale segment<sup>59</sup> are concerned that the level of  $B_0$  selected was so much lower than the  $B_0$  values used in Canada and USA.

**A Polish fisheries organisation**<sup>60</sup> proposes a TAC set at  $F=F_{2023}$ , that is 116,775 tonnes.

**Some small-scale fisheries representatives**<sup>61</sup> recommend setting the 2024 TAC at  $F_{MSY}$  lower (41,706 t). The corresponding EU TAC equals 35,687 t. They highlight that cod bycatch in the pelagic trawl fishery is estimated at over 1% of catches, therefore this choke species situation needs to be accounted for.

**A group of OIG members**<sup>62</sup> does not provide a quantitative catch recommendation, due to the degraded state of the stock and high uncertainties, but recommend to minimise the fishing pressure. They draw attention that in its advice, ICES recognises that *“Even a zero catch in 2024 will not bring the stock above  $B_{lim}$  in 2025 with 95% probability”*, meaning the risk of the stock falling or remaining below  $B_{lim}$  would exceed 5%, contrary to what Article 4(6) of the Baltic MAP requires.<sup>63</sup> Any higher TAC would therefore not be in line with the Baltic MAP. If however a non-zero TAC is nonetheless adopted, this should be limited to a small allowance reserved exclusively for low-impact coastal fishers catching herring for direct human consumption. The WGBFAS suggested that *“ $F = 0$  should be considered as basis for the advice”*<sup>64</sup>, and any non-zero TAC would not be in line with Article 4(6) of the Baltic MAP.

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<sup>57</sup> LIFE, Darłowska Group, SYEF

<sup>58</sup> Deduct 9.5% Russian share. Add 902 t for Gulf of Riga herring to be taken in SD 28.2 and deduct 2,959 t for Central Baltic herring to be taken in the Gulf of Riga (SD 28.1).

<sup>59</sup> LIFE, Darłowska Group, SYEF

<sup>60</sup> Fish Producers' Organisation Bałtyk

<sup>61</sup> LIFE, Darłowska Group, SYEF

<sup>62</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA.

<sup>63</sup> ICES, 2023. Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). Replacing advice provided in May 2023. ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.23310368.v1>

<sup>64</sup> ICES, 2023. Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. 5:58. 606 pp. <https://doi.org/10.17895/ices.pub.23123768>, p 254. Full quote: *“Note that no EU MAP scenario will keep the stock above  $B_{trigger}$  in 2024, and the probability of being below  $B_{lim}$  is between 31% and 29%. Even a zero catch (in 2024 will not bring the stock above  $B_{lim}$  in 2025 with 95% probability. As the EU MAP states that “Fishing opportunities shall in any event be fixed in such a way as to*

**Some Polish fishers**<sup>65</sup> do not support the ICES advice for herring in this management area. They draw attention to the fact that the advice does not take account of selectivity and mortality of small pelagic fish escaping through meshes, that have a substantial influence on the stock dynamics and are well documented in the relevant literature. They also underline the strong dependency of sprat on the cod stock. Further limitation of sprat and herring catches will increase predation on cod eggs and larvae in the Baltic, which may be an important factor hampering cod stock recovery. In their view, alternative approach to technical measures should result in bigger and better population.

**The Finnish fishers**<sup>66</sup> are of the opinion that the changes of the fishing opportunities for central Baltic herring from one year to another should not increase more than 20%.

### **Herring SDs 22-24**

**The BSAC recommends** that the 2024 TAC for herring in SDs 20-24 management area should be set at  $F_{2023}$  corresponding to a TAC of **7,669 t**. This would translate into a **TAC for SDs 22-24 of 788 t**. According to ICES, such TAC will allow for a 5% increase of the SSB.

**The BSAC** cannot agree to setting a zero TAC for 2024. **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 recognises** that although the ICES advice clearly underlines that the WBSS stock is increasing in biomass, there is still a need for remedial measures in order to further support the positive development of the stock. **BSAC recommends to implement additional measures to protect and restore known spawning habitats and nursery areas, as indicated in the ICES advice.** These measures should include mitigation of the effects of offshore wind farms, sand and gravel extraction sites, and waste dumping.

**The BSAC reiterates** its request to the European Commission to ask ICES to use the MAP as its headline advice. **The BSAC agrees** that in the short term the Baltic MAP should act as a rebuilding plan and that it can be the guiding tool for the management of this stock for now. This request was clearly stated in the letter sent to DG Mare in October 2022<sup>67</sup>.

**The fisheries representatives**<sup>68</sup> point to the fact that the management of this stock is difficult because the stock is composed of different sub-populations which constantly mix and fluctuate. They also underlined the need to improve knowledge on the herring stocks, in particular with respect to the reference points and the productivity of the ecosystem, in order to improve the management. In their view, the EU Baltic Sea MAP should be used as basis of the advice for this shared stock. However, to allow positive development of the stock to continue, they are in favour to set the TAC as the rollover of the 2023 TAC.

**Some small-scale fisheries representatives**<sup>69</sup> recommend to allocate the 2024 TAC of 788 t for SDs 22-24 only to vessels that use passive gears.

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*ensure that there is less than a 5% probability of the spawning stock biomass falling below  $Blim$ ,  $F = 0$  should be considered as basis for the advice”.*

<sup>65</sup> National Chamber of Fish Producers, Fish Producers' Organisation Bałtyk, Association of Fishermen of Sea PO

<sup>66</sup> Finnish Fishermen's Association

<sup>67</sup> [BSAC recommendation on western Baltic Herring](#), 28/20/2022, Ref: BSAC/2022-2023/27

<sup>68</sup> DFPO, DPPO, Union of German Cutter Fishery,

<sup>69</sup> LIFE, Darłowska Group, SYEF, FSKPO

**A group of OIG members**<sup>70</sup> recommends that the TAC for 2024 should be zero. They also recommend to implement additional measures to protect and restore known spawning habitats and nursery areas, as indicated in the ICES advice.

### **Sprat SDs 22-32**

**The BSAC recommends** setting the **2024 TAC at  $F_{MSY}$  upper of 247,704 tonnes**. Taking into account the share for Russia (10.08%), this would give EU TAC of **222,735 t**. This TAC is within the range recommended by ICES and would result in a 15.9% increase of the SSB in 2025.

**The BSAC would like to provide** a further rationale for using the upper  $F_{MSY}$  option for sprat, related to species interrelations between sprat and herring as well as sprat and cod. Sprat competes for food with both herring and small/juvenile cod, and a lower sprat biomass may therefore be positive to allow both the central Baltic herring to recover from its current low biomass levels as well as help the cod stocks recover. Sprat predation on cod eggs is well known and scientifically documented, and with the current situation for the cod stocks all measures should be taken to reduce the natural mortality of the cod, including using the higher range for sprat to reduce egg predation as well as food competition between sprat and juvenile cod for plankton.

According to the **fisheries representatives**, fishers apply different methods to avoid by-catch of herring in sprat fishery. Areas of high concentration of herring are avoided by fishers targeting sprat.

**Some Polish fishers**<sup>71</sup> do not support the ICES advice for herring and sprat. They draw attention to the fact that the advice does not take account of selectivity and mortality of fish escaping through meshes, that have a substantial influence on the stock dynamics and are well documented in the relevant literature. They also underline the strong dependency of sprat on the cod stock. Further limitation of sprat and herring catches will increase predation on cod eggs and larvae in the Baltic, which may be an important factor hampering cod stock recovery.

**Another Polish fisheries organisation**<sup>72</sup> underlines that as sprat competes with both herring and small/juvenile cod for food and a lower sprat biomass may therefore be positive to allow both the central Baltic herring to recover from its current low biomass levels as well as help the cod stocks recover. Sprat predation on cod eggs is well known and scientifically documented, and with the current situation for the cod stocks all measures should be taken to reduce the natural mortality of the cod, including using the higher range for sprat to reduce egg predation as well as food competition between sprat and juvenile cod for plankton. Sprat catches should be considered as sanitary catches, aimed at protecting biodiversity of marine ecosystem. They propose to set the 2024 TAC at the level of  $F_{lim}$  (374,838 tonnes), still allowing for an increase in SSB.

**Some small-scale fisheries representatives**<sup>73</sup> recommend to set the 2024 TAC for sprat at 62,559 t (50% larger than central Baltic herring). The corresponding EU TAC equals **56,253 t**. According to the ICES WGBFAS report, catches of Baltic herring and sprat were caught in the ration 41:59 in 2022, although the ratio of mixed catches varies between fishing gears, seasons and areas. Further, ICES highlight their concerns with catch misreporting and highlight that this increases the uncertainty of their models and scientific recommendations. They highlight that cod bycatch in the pelagic trawl fishery is estimated at over 1% of catches, therefore this choke

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<sup>70</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>71</sup> National Chamber of Fish Producers, Association of Fishermen of Sea PO

<sup>72</sup> Fish Producers' Organisation Bałtyk

<sup>73</sup> LIFE, Dałowska Group, SYEF

species situation needs to be accounted for. They strongly disagree about the rationale for using the upper FMSY option for sprat, related to species interrelations between sprat and herring as well as sprat and cod and refer to the answer given by the Commission on that topic in 2021<sup>74</sup>.

**A group of OIG members**<sup>75</sup> cannot provide a quantitative catch recommendation, due to the mixing with the degraded herring stocks in the Central Baltic, but recommends setting the 2024 TAC below the lower end of the F<sub>M</sub>SY range ( $\leq 171,815$  t). Their recommendation is also based on F being above F<sub>M</sub>SY, misreporting issues and information that the two most recent recruitment estimates are among the lowest in the time series<sup>76</sup>. To be able to set a fixed sprat TAC, spatial management and measures to account for species interactions must be put in place (e.g. by spatial or temporal limitations). They recommend to increase control, enforcement, onboard monitoring and sampling of landings to ensure that the widespread misreporting of sprat as herring does not continue.

### **Salmon in SDs 22-31**

**The BSAC is in consensus** on the need to look at a renewed management of the Baltic salmon in all SDs. It repeats its calls to initiate the work on developing a management plan.

**The BSAC does not recommend setting a zero TAC for salmon in the mixed-stock sea fisheries in SDs 22-30.**

**The Danish fishers**<sup>77</sup> do not agree with the management measures introduced last year. It has had a major effect on those who fish salmon in Denmark and prevented them from pursuing their traditional fishery, at the same time transferring the fish to fishers from other countries. They hope that a proportion of the TAC could also be allocated to the Danish fishers.

**The Finnish and Swedish fishers**<sup>78</sup> cannot accept the advice to allow salmon fishery only in the Bothnian Bay. They underline that salmon is an important commercial fish species in other areas as well. In addition, they question the possibility to catch any salmon from the Ljungan river along the Finnish coastal line inside 4 nautical miles where the commercial salmon fishery is allowed. In their view, the Main Basin salmon should be managed the same way as in 2022 and 2023. Additional restrictions should be implemented in the near vicinity of Ljungan river where the probability to catch these rare salmon individuals is the greatest.

**Some Polish fishers**<sup>79</sup> are of the view that the advised salmon management in the Main Basin is against the rules establishing the fishing opportunities of the EU Member States as it prevents fishers from some Member States from pursuing salmon fishery, while at the same time giving the fishing opportunities to the fishers from some other countries.

**The representatives of recreational anglers**<sup>80</sup> recommend the following regulations and actions concerning Baltic salmon for 2024:

- a bag limit of one salmon (excluding recent spawners) per angler and day for sea anglers south of latitude 59.30 N.

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<sup>74</sup> [COM Letter on BSAC's recommendations for the fishery in the Baltic Sea for 2022–follow-up with information on sprat](#)

<sup>75</sup> CCB, WWF Finland, BalticWaters, FishSec, EAA

<sup>76</sup> ICES, 2023. Sprat (*Sprattus sprattus*) in subdivisions 22-32 (Baltic Sea). In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, spr.27.22-32. <https://doi.org/10.17895/ices.advice.21820581>

<sup>77</sup> Danish Fishers PO (DFPO)

<sup>78</sup> Finnish Fishermen's Association, Federation of Finnish Fisheries Associations, Swedish Fishermen PO

<sup>79</sup> National Chamber of Fish Producers, Fish Producers' Organisation Baftyk, Association of Fishermen of Sea PO

<sup>80</sup> European Anglers Alliance

- recreational trolling north of 59.30 N should be subject to member state regulation and not be unnecessarily regulated by a 4 nautical mile boundary.
- a new study of mortality of Atlantic salmon released after being caught via trolling should be carried out.
- regulations demanding landing of whole un-filleted fish should only be for salmonids (salmon and sea trout), not for other species such as pike, perch and pikeperch.
- utilise more EMFAF funding for the removal of fish migration barriers in the rivers.
- a Europe-wide program should be initiated to achieve a balanced European management of cormorants.<sup>81</sup>

**A group of OIG members<sup>82</sup> recommend** to close targeted fishing (commercial and recreational) for salmon with mixed stock origin in the Main Basin areas (22-30) and to set a TAC at no more than **56,640 salmon**, and active and targeted salmon fishing can only take place in Bothnian Bay area 31 within four nautical miles from the coast.<sup>83</sup>

**Another representative of the OIG<sup>84</sup> proposes** to stop all mixed stock salmon fishing in the entire Baltic Sea, including SD 31, where there are several very weak stocks. Salmon should be managed in small management areas. This would permit better management of commercial fishing against primarily farmed stocks but also the few strong stocks that would withstand commercial fishing. In their view, recreational anglers should be allowed to keep not more than one farmed salmon per person per day. All mixed stock fishing, commercial or recreational, must cease to give the weak stocks a chance to recover.

### Salmon in SD 32

**The BSAC recommends** that the 2024 TAC for salmon in SD 32 should be no more than **11,800 salmon**. This would correspond to reported commercial landings of **10,100 salmon**.

**A group of OIG members<sup>85</sup> recommends** that the TAC for 2024 should not exceed **9,160 salmon** (Russian catches deducted). Furthermore, no wild salmon should be targeted in the Gulf of Finland. Salmon in the Gulf of Finland can be targeted only by fishing gear that is proven to do no harm to released wild salmon bycatch. Salmon from the Gulf of Finland mix with main basin salmon stocks at sea. The mixed stock sea fishery must be stopped to safeguard the Gulf of Finland stocks.

### Sea trout

**Some members of the OIG<sup>86</sup> refer** to high bycatch rates of sea trout in some areas of the Baltic and recommend to reduce bycatch of sea trout in fisheries targeting other and well as introduce local management measures for sea trout.

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<sup>81</sup> <https://www.eaa-europe.org/positions/baltic-salmon-2023.html>

<sup>82</sup> CCB, WWF Finland, FishSec

<sup>83</sup> 60,000 salmon minus the Russian share and deducting the known recreational fishing in area 31 (*ibid.*, Table 12)

<sup>84</sup> Baltic Salmon Rivers Association

<sup>85</sup> CCB, WWF Finland, FishSec

<sup>86</sup> Baltic Salmon Rivers Association, European Anglers Alliance