BSAC executive committee members comments on the amendments to the BALTFISH draft Joint Recommendation regarding a derogation from the landing obligation in the Baltic Sea establishing a discard plan as regards salmon in the Baltic Sea (ICES Subdivisions 22-32)

Answers received from the Executive Committee members by the 07/06/23.

Baltic Salmon Rivers Assoc., CCB, DAFV, EEA, FANC, FishSec, WWF

The OIG group consider that a prolongation and expansion of the exemption from the obligation for salmon caught in pontoon traps (including gears modified with a pontoon-trap water hold (WH) or knotless bag (KL)) should not be granted.

The OIG groups agree with STECF that salmon stocks are increasingly challenged by higher water temperatures at sea and in river and a deteriorating health status, we therefore believe that all forms of exemption to the LO leading to handling of fish must be kept to a minimum. The OIG group therefore believes a prolongation and expansion of the exemption to the LO, especially one allowing for a new fishing method (WH) with an observed higher release mortality than the current method (KL) is inappropriate.

The current exemption states that the maximum number of released salmon shall be limited to not more than 8 % of total annual catches from each Member State's quota of salmon, the OIG strongly agree with STECF that this threshold must be assessed. Any limit on the maximum numbers of released fish will result in an incentive to underreport numbers of released salmon, therefore any assessment of the 8% threshold must also include assessment of potential underreporting and monitoring and enforcement needed to ensure compliance and success of such a tool.

An inclusion within the current exemption of a new method including the usage of a water hold (WH) would be a major expansion to the current legislation. As stated in Ruokonen et. al. 2022 the pontoon-trap WH method will result in increased air exposure compared to the pontoon-trap KL method and an increased mortality of released fish (24% mortality with WH method, 13 % with KL method). The OIG group points out that there is no specification for how any form of water hold should be formed (volume, placement etc) or utilised. Without a specification of size of hold there is an obvious risk that a small or insufficiently filled hold could be utilised, leading to increased damage to and mortality of released fish. It is important to point out that fishing vessels in the pontoon fishery are small open boats (< 6m) with outboard motors. A water filled container of the size needed to empty potentially large catches of salmon (+50 fish) will result in the instability of smaller boats. Control of if the water hold has been used and filled correctly can only be done at sea and this form of control of the coastal salmon fishery is seldom used compared to landing control. We therefore agree with STECF that the pontoon-trap WH method will lead to increased mortality of salmon, and we are of the opinion that the WH method is not appropriate for a fishery consisting of small, open boats (< 6m), fishing in exposed areas, and will lead to further difficulties of control.

Fishing for other species during salmon migration risks multiple capture and release events for individual salmon with an associated cumulative mortality. The OIG questions that the risk of repetitive catch has reduced. While it may be true that there are fewer gears in the fishery, previous timed fishing closures during migration have been reduced and new exemptions to allow more gears to fish earlier in season have been created. Coastal regions and river mouths in proximity to salmon rivers still have several tens of gears creating a clear risk for multiple capture and release of fish. Therefore, the risk for multiple capture and release events and cumulative mortality has still not been sufficiently accounted for.

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The OIG states that pontoon traps should only be used for what they are currently designed for, as very efficient, seal safe and ergonomic gears for salmon fishing. When the salmon quota is caught then pontoon traps including pontoon-traps KL and WH should not be permitted to be used as a selective gear.

SFPO

SFPO supports the prolongation to an existing exemption to the landing obligation for salmon caught with trap-nets, fyke-nets and pound nets.

The new Finnish study gives good and relevant information on discard mortality of different emptying methods of trap nets in salmon fishery. The results support the earlier findings that using a lifting bag reduces release mortality. The study also concludes that the role of release mortality for salmon stocks is small because the number of salmon released in coastal fisheries is low. Although there are no explicit numbers available (and these are very difficult to obtain) on discard rates, this study describes the fishery having low discard rates and thus gives some information STECF requested on discarded quantities.

We also want to point out that we have serious concerns about the quality of the Swedish Östergren et al 2020 study in Älvkarleby. Firstly, fish in control and treatment groups had very different treatments and thus can not be compared with. Secondly, the procedures during the experiment were very far away from a real fishing situation, the marking method was very invasive, and the fish were transported long time and distances in big boxes (which is never the case in fishery) causing additional stress to fishes. The results from this study should not be used as supporting information for management purposes.

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