

HELCOM Secretariat

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Copenhagen, 27th June 2025

**Subject: Consolidated response on BSAC views on the draft revised HELCOM common understanding of ecosystem-based fisheries management**

Dear HELCOM Secretariat,

The Baltic Sea Advisory Council (BSAC) welcomes the HELCOM process on formulating common understanding of ecosystem-based fisheries management and appreciates the opportunity to provide BSAC comments and response on the draft document.

The BSAC would like to thank the HELCOM secretariat for the invitation to the HELCOM informal consultation workshop on Ecosystem-Based Fisheries Management and to the 5th Informal Consultation Session of the Working Group on Ecosystem-based Sustainable Fisheries, organized on the Isle of Vilm, Germany on 4-6 March 2025. The BSAC would also like to thank for the HELCOM presentation on draft HELCOM common understanding of ecosystem-based fisheries management in the BSAC Ecosystem Based Working Group meeting on 21<sup>st</sup> May.

The BSAC members have discussed the draft document in the BSAC EBM working group meeting on 21<sup>st</sup> May and the BSAC members have been given the opportunity to provide comments on the document by written procedure. The BSAC received comments from the European Anglers Association, European Fishmeal and Fish Oil Producers, the Federation of Finnish Fisheries Associations, the Swedish Pelagic Federation PO, the Danish Fishers PO and WWF Baltic Sea Programme. The Baltic Salmon Rivers Association replied that they have no comments on the document.

The BSAC did not formulate a common agreed position but would like to contribute to this work with the presented input that combines the comments received from the BSAC member organisations.

## **General comments:**

The Baltic Sea Advisory Council has flagged on several occasions that the current implementation of the CFP and the functioning of the Multiannual Plan for the Baltic Sea (MAP) has not lived up to expectations. The BSAC White Paper (2022) starts by underpinning the importance of the ecosystem-based approach to fisheries management. However, the BSAC has not yet formulated a specific advice on how the ecosystem-based approach to fisheries management should be defined and implemented in the Baltic Sea.

Some of the BSAC members find that tone of voice and focus of the draft HELCOM document is reflecting a fundamental negative view of the fisheries' impacts on the environment. They perceive that the industry is experiencing unfair accusations of being the main contributor to environmental degradation and that fisheries are almost uniformly portrayed as dangerous to the environment and something that must be further regulated and/or stopped. They find that recognizing the role of the fisheries as a part of the European food supply chain and other positive aspects of the fisheries are lacking in the document.

Further, they see that healthy fish stocks and a sound ecosystem are essential, but ecosystem-based management must contain more elements than just further regulating the fisheries. It is important to include the knowledge that exist regarding the effects of the environment on the fishery. They draw attention to the increased populations of seals and cormorants and to the massive eutrophication that is the main environmental problem in the Baltic Sea and ask for more focus from HELCOM to these issues.

One BSAC member highlights the need to increase the relevance of the HELCOM definition concerning recreational fishing. While the document does state, within the Aim and Scope, that fishing includes both commercial and recreational fishing, it seems to narrow the objectives as such that it only becomes, applicable to commercial fishing.

## **Specific comments on text:**

### **Context and definitions**

BSAC comments:

- With regards to the describing the poor status of the Baltic Sea fish stocks, one BSAC member flags that some fish stocks in the Baltic Sea are showing signs of recovery due to recent management measures, and efforts to rebuild stocks and improve selectivity are ongoing. Recognizing these positive developments

alongside the ongoing challenges would help present a more constructive foundation for advancing ecosystem-based fisheries management.

- Regarding the direct impacts of fishing on fished resources and marine habitats, one BSAC member suggest that it would be helpful to acknowledge that ICES advice already incorporates some of these considerations through ecosystem overviews, multispecies and mixed-fisheries models. Further development and implementation of ecosystem-based advice is still needed, but it would be useful for the HELCOM text to recognize the existing scientific frameworks and progress already being made.
- With regards to the CFP objectives on page 3, one BSAC member suggest to add a quote from CFP article 2.3 which states that *"The CFP shall implement the ecosystem-based approach to fisheries management so as to ensure that negative impacts of fishing activities on the marine ecosystem are minimised, and shall endeavour to ensure that aquaculture and fisheries activities avoid the degradation of the marine environment."*

## Objectives and actions

- Regarding the introduction, one BSAC member asks to add following sentence at the at the end of the paragraph: "Formulating ecosystem-based fisheries management objectives is a basis for implementation of the ecosystem-based approach to fisheries management".
- 1. Marine biological living resources, including fish and shellfish, are healthy in terms of abundance, distribution, condition, recruitment and population structure, and fulfil their ecological function. Exploited stocks can recover in the short term, and the long-term sustainability of fisheries is ensured.**
    - 1a. Extracting fish at levels that ensure populations remain at and/or recover to a size/age distribution, spawning biomass and spatial distribution that allows them to fulfil their ecological function in a healthy food-web, e.g. supplying sufficient food for higher trophic level predators (such as piscivorous fish, seabirds, marine mammals)*
    - One BSAC member comments that they support the recognition that fish populations should fulfil their ecological role, particularly as prey for higher trophic level predators. While this is a key consideration for ecosystem-

based management, they note that ICES already integrates ecosystem dependencies into its advice, for example through precautionary harvest control rules and multispecies considerations for forage fish.

To avoid duplication and improve clarity, they recommend that the document acknowledges this existing practice and focuses on how HELCOM and fisheries managers can ensure that such advice is fully reflected in decision-making on catch limits and management measures.

- One BSAC member does not accept the objective that includes the idea that managing fisheries is the only solution to ensure the feeding of eg. seals and cormorants. They see that growing stocks of seals and cormorants and their predation on fish stocks are taken as granted in this equation without an alternative solution.

*1b. Complying with the legal requirements of the EU CFP and EU MSFD when agreeing on total allowable catches (TACs), applying the precautionary approach as defined in the EU CFP; and implementing other fisheries management measures to achieve agreed targets as described above.*

*1c. Considering and addressing other pressures on fish, such as oxygen depletion as a result of eutrophication, increasing water temperatures as a result of climate change, changes in trophic relations and dynamics, habitat destruction, underwater noise and pollution, and associated changes in recruitment and productivity as well as shifts in distribution in fish stocks, taking a precautionary approach in adaptive management.*

- One BSAC member refers to both 1b and 1c and says that they accept the precautionary approach as a principle but would be very careful with how it is interpreted and used in management decisions. For example, the lack of information concerning changes in environmental conditions is as such not a sufficient basis to apply precautionary approach if there are no additional signs that these changes would have severe consequences to fish stocks.
- One BSAC member welcomes the inclusion of broader environmental pressures. These are critical stressors affecting recruitment, distribution, and productivity of Baltic fish stocks. They suggest clarifying how these stressors will be more systematically integrated into scientific advice, particularly in stock assessments. This could include steps toward incorporating environmental drivers in population models and developing assessment frameworks beyond single-species approaches

*1d. Continuing to improve ecosystem-based scientific advice on fishing opportunities and ensuring that fisheries stock assessment models take into account all relevant pressures and reflect uncertainty.*

- One BSAC member suggests to further elaborate on this important element and amend the sentence: *"Continuing to improve ecosystem-based scientific advice on fishing opportunities **through exploring the potential of long-term management strategies, management strategy evaluations and ecosystem reference points** and ensuring that fisheries stock assessment models take into account all relevant pressures and reflect uncertainty"*.
- One BSAC member refers to their comments on 1c on clarifying how the environmental stressors will be more systematically integrated into scientific advice, particularly in stock assessments.
- One BSAC member refers to the objective and actions in a more general level, saying that the first actions are redundant, but adds to the negative tone in the document. They recognize a couple of good points in impacts on fish (c and d), but the two last actions should be modified as they add to the conflict in their present form.

## **2. Negative impacts from fishing activity on endangered, threatened, or protected species, as well as on sensitive and essential habitats and the marine ecosystem are minimized and where possible eliminated.**

*2d. Swiftly implementing systems (including for tracking) for effective monitoring of all catches (e.g. using CCTV, REM), including incidental bycatch of protected species, in all segments of the fleet, particularly on smaller vessels (< 12 Meter without VMS obligation)<sup>19</sup> engaged in static net fisheries to determine fishing effort and activity for all fishing métiers, in line with the EU control regulation<sup>20</sup> and in order to allow evaluating fisheries activities and assessing their environmental impacts*

- One BSAC member strongly supports the recommendation to implement effective monitoring. They say that this would allow for a more balanced playing field in transparent monitoring and improve regulatory compliance. Improved monitoring is also essential for producing accurate data on fishing activity and ecosystem impacts.

- One BSAC member does not accept objectives to add video monitoring to small scale coastal vessels (<12 m). They say that, at least in Finland, these vessels and their catch is inspected regularly already both during the fishing and when landing their catch.

*2f. Implementing, as relevant, other fisheries management measures as necessary to achieve conservation objectives of MPAs established in line with the objective to reach the target of 30% marine protected areas by 2030.*

*2g. Implementing 10 % strictly protected areas, to better understand and prevent negative impacts from fisheries on marine habitats and ecosystems (see also objective 1 e.)*

- One BSAC member refers to both 2f and 2g and suggest strengthening the link between spatial protection and the actual ecological outcomes, particularly in relation to fish recruitment and survival. There is a risk that MPA designation becomes a “box-ticking” exercise unless protections are tied to evidence-based ecological functions, such as spawning or feeding grounds.

They further recommend that the document explicitly calls for site selection and management of MPAs (and fish stock recovery areas) to be guided by scientific data and that monitoring is conducted to evaluate biological effectiveness in terms of targeted stock recovery.

- One BSAC member highlights that defining the strictly protected areas should be made in close co-operation with fishermen to minimise the negative impact to industry.

*2h. Where feasible and effective promoting applying non-lethal and least invasive methods to reduce top-predator interactions with fisheries, such as deterrent devices.*

- One BSAC member says that the point on top predators highlights to members of the fishing community how the blindfolded approach of HELCOM ignores the fact that predation and other impacts from seals and cormorants seems to be the main factors preventing the recovery of the cod stocks.

*2j. Integrating in fisheries advice and management consideration of impacts of fishing on prey depletion in trophic interactions (cf. also Objective 1a).*

- One BSAC member asks to add reference also to the action 1d together with 1a.

### **3. Carbon footprint of fisheries is minimized and the function of the Baltic Sea as a carbon sink is ensured, contributing to mitigating climate change.**

*3a. Identifying the impact of fisheries on carbon storage capacity and implementing management measures as relevant to increase the carbon storage capacity of the marine ecosystem for example by avoiding fishing with mobile bottom-contacting gear in carbon-rich sediments and/or in areas with high carbon sequestration rates (e.g. silt) as well as in seagrass beds.*

- One BSAC member finds the action 3a novel and important but flags the need for a clearer link to current scientific uncertainties, e.g., that evidence on carbon storage in benthic sediments is evolving and should be a research priority.
- One BSAC members comments that this action is based on speculative and scientifically challenged assumptions and should be deleted. The point about mobile gears in seagrass beds is strange and indicates a worrying lack of knowledge. They explain that seagrass only grows in shallow waters (if not prevented by eutrophication) where the only mobile gear used is the mussel dredge. The dredge is used where mussels aggregate and where seagrass does not grow (because of the mussels – not because of the dredge). They use example of Limfjord in Denmark where dredging for mussels only occur in 3% of the fjord's area. To claim that mussel dredging is the reason for the problems in the fjord is absurd.

### **4. Fisheries are economically, and socially sustainable and viable within the boundaries of ecological sustainability**

*4b. Creating opportunities for fisheries to contribute to local economies, social sustainability and fish as food source for coastal communities*

- One BSAC member sees that is important that the term recreational opportunities is included in the list as currently the text does not recognize this important service to EU citizens. They suggest amending the text: *“Creating opportunities for fisheries to contribute to local economies, social sustainability, **provide recreational opportunities**, and fish as food source for coastal communities”.*

*4c. Providing incentives (e.g. financial, fishing opportunities, etc.) and built capacity to enable transition to fishing practices that minimise negative impact on the marine ecosystem, this could include diversification, such as transition to for example tourism.*

- One BSAC member suggests amending the text with adding **pesca-tourism** in the text as an example of diversification. They explain that Pesca tourism is a form of tourism that involves non-commercial fishing activities, offering tourists a chance to engage with local fishing practices and communities. It's gaining popularity as a way for fishermen to diversify their income and for tourists to experience local culture and fishing traditions. "Pesca tourism" is therefore different from "tourism" and both terms should be used when talking about diversification for commercial fishers. Whale watching is tourism - having a trip out to lift a commercial gear like a lobster pot and then cooking the catch together with the fisher is Pesca tourism. Pesca tourism should be clearly defined in EU fishing management. They further explain that Pesca tourism affects fish resources, tourism not.

*4i. Considering spatial requirements of fisheries in planning and licensing processes of offshore wind and other maritime activities to ensure fishing is viable in the future and develop solutions for co-location of fisheries with other activities where necessary*

- One BSAC member suggests amending the text: "*Considering spatial requirements **and access** of fisheries in planning and licensing processes of offshore wind and other maritime activities to ensure fishing is viable in the future and develop solutions for co-location of fisheries with other activities where necessary*".

They explain that recreational fishing can still be carried out within OWE farms, but this must be guaranteed through a permission process. Without a legally binding guarantee of access when can expect OWE areas to be closed even for non-anchoring recreational fishers. This would effectively privatize and close large geographic areas currently in common ownership of EU citizens.

*4k. Considering the impact of fisheries on the environmental when allocation fishing opportunities.*

- One BSAC member suggest to amend the text: “*Considering the impact of fisheries on the **environment** when **allocating and managing fishing and fishing opportunities**”.*
- One BSAC member comments on objective 4 in a more general level. They say that nobody in the industry would disagree to heading of objective 4, not even with the full text, stating that it must be within the boundaries of ecological sustainability. The question here is; who defines those boundaries? They see that most of the actions under objective 4 gives the impression that some city people with long educations like to tell the stupid fishers how things should be done. It does not add to the mitigation of the growing conflict between rural producers and urban consumers.

They continue that they are acutely aware of the fact that nature in (and around) the Baltic Sea are conspicuously different from what they have been. The decline of the cod stocks is unquestionable, but many other stocks are not doing terribly bad. They say that they of the opinion that the fishing industry is suffering from the consequences of a neglectful environmental policy (partly the responsibility of HELCOM) rather than the bad environmental status is a consequence of a wrong fishery management. They say that fishing has an effect on environment, but it is also dependent on operating in a healthy environment.

The BSAC remains available to continue to contribute to the review of the HELCOM common understanding of ecosystem-based fisheries management and thank you for your consideration of this letter.

Yours sincerely,



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EBM Working Group Chair



Jarek Zielinski  
Executive Committee Chair