BSAC recommendations for the fishery in the Baltic Sea in 2026

The BSAC recommends setting the catch levels for the Baltic stocks in 2026 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 2026[1]		BSAC recommendation for EU TAC 2026	BSAC minority positions EU TAC 2026
Cod SDs 22-24	**0 t** (Advice for 2026 and 2027)	Precautionary approach	**266 t (by-catch only) (roll-over of 2025 bycatch TAC)[2]**	• **0 t**[3]
Cod SDs 25-32	**0 t** (Advice for 2025 and 2026)	Precautionary approach	**Bycatch TAC 430 t (rollover of 2025 bycatch TAC)[4]**	• **0 t**[5]
Plaice SDs 21-32	**SDs 21-32: 16,533 t (-18%** as compared to the advice for previous year**)**	MSY approach	**SDs 22-32: 10.971 t**	• **≤ 4,894 t**[6] **(F=F2024)**[7]

[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.
[2] LIFE: Supports this if only small-scale fishery using passive gears can conduct directed fishery
[3] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation. Joint NGO recommendation 250617-Joint-NGO-TAC-paper_2025_layout_FINAL.pdf
[4] LIFE: Support this if only small-scale fishery using passive gears can conduct directed fishery
[5] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation
[6] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation, LIFE,
[7] **The corresponding catch for the F=F2024 scenario for plaice in SD 22-32 is 798 t + (8524 t - 2216 t) = 7,106 t.**

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Herring SDs 30-31	**55,869 t – 62,684 t** (**-16%** as compared to the advice for previous year**)**	EU multiannual plan (MAP) for the Baltic Sea	**55,869 t**	• **≤ 25,560 t[8]**
Herring Gulf of Riga SD 28.1	**23,962 t – 35,643 t** (**-21%** as compared to the advice for previous year**)**	EU multiannual plan (MAP) for the Baltic Sea	**34,367 t[9]**	• **≤ 27,416 t[10]**
Herring SDs 25-29, 32	**120,378 t – 157,996 t** (**+26%** as compared to the advice for previous year**)**	EU multiannual plan (MAP)	**EU TAC = 139,532 t[11]**	• **< 89,827 t[12] (EU TAC)** • **EU TAC 105,488 t[13]** • **EU TAC 88,707 t[14].**

[8] BalticWaters, Baltic Salmon Rivers Association, EAA, DAFV, Coalition Clean Baltic, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation, Low Impact Fishers of Europe (LIFE)

[9] Calculation of the TAC for this management area MAP F_{MSY} 30,913 t - 636 t +4,090 = 34,367 t

[10] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, DAFV, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation, LIFE

[11] Calculation of the **EU quota**: **Total TAC 157,996 t (EU MAP)** minus Russian share of 9.5% + 636 t – 4090 t **= 139,532 t**

[12] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, DAFV, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation

[13] Swedish Fishermen PO, Swedish Pelagic Federation PO

[14] (0.5Fmsy) LIFE

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Herring SDs 22-24	**0 t**	MSY approach and precautionary considerations	**788 t bycatch TAC (rollover)**[15]	• **0 t**[16]
Sprat SDs 22-32	**176,056 – 230,518 t** **(+36%** as compared to the advice for previous year**)**	EU multiannual plan (MAP) for the Baltic Sea	**EU TAC** = **201,975 t**[17] Decision on TAC should be based on the latest knowledge from the spring trawl survey	• EU TAC <158,310 t[17] • **EU TAC 158,310 t**[18] • **EU TAC 207,282 t**[19] • **EU TAC 103,405 tonnes**[20]
Salmon SDs 22-31	**30,000 salmon only in SDs 29N – 31** **(-25%** as compared to the advice for previous year**)**	Precautionary approach	**30,000** salmon in the Gulf of Bothnia and the Åland Sea for both commercial and recreational fisheries	• **No targeted fishery**[21] • **5,000 adipose fin-clipped salmon from SD 31, only in close proximity to rivers with compensatory releases** [22]
Salmon SD 32	**11,800 salmon (**rollover - corresponds to reported	Precautionary approach	**10,480 salmon**	**≤ 10,480 reared salmon**[23]

[15] LIFE: Support this if only small-scale fishery using passive gears can conduct directed fishery
[16] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation
[17] Calculation of the EU TAC Total TAC 224,616 t minus Russian share of 10.08% = 201,975 **t**
[18] Swedish Fishermen PO, Swedish Pelagic Federation PO
[19] Association of Fishermen's of Sea- PO, Association of fishermen and fish processors „Baltijos zvejas“
[20] LIFE. This is calculated as 0.5 F_{MSY}(F=0.17): 114,983 t minus 10.08% Russian share = 103,405 t.
[21] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, , FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation
[22] Baltic Salmon Rivers Association, EAA, DAFV
[23] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, DAFV, FANC, Fisheries Secretariat, WWF, LIFE

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	commercial landings of 10,480 salmon)			

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.

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General comments to the ICES advice for the fishery in the Baltic Sea in 2026

The recommendations presented here have been developed 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 17th June 2025. 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 26th June 2025. The recommendations were approved according to RoP rule 32. The discussions of BSAC members focused on the limitations in the current scientific advice, the importance of diverse factors affecting fish stocks as well as the mixed fisheries and selectivity issues.

The BSAC once again acknowledges that many species and habitats of the Baltic Sea are not in good condition, according to recent assessments. This situation affects foodweb functionality, reduces the resilience and resistance against further environmental changes, and diminishes prospects for socioeconomic benefits, including fishing opportunities[24]. Three stocks are faced with zero catch advice (eastern Baltic cod stock, western Baltic cod stock and western Baltic herring). However, for some stocks such as central Baltic herring and sprat the catch advice is higher than last year. Some fish stocks in the Baltic Sea are showing signs of recovery, and efforts to rebuild stocks and improve selectivity are ongoing. With a view to working towards an ecosystem-based fisheries management it is necessary to recognize positive developments alongside the existing challenges for a more holistic view.

The BSAC agrees that the focus must remain on the overall ecosystem while not excluding other factors affecting fish stocks. Fisheries management should follow rapid changes in the ecosystem. It is important that the decision-making process at regional level is adaptive and fast. Fishing is just one of the factors that are influencing the stocks. For several stocks in the Baltic the fishing pressure is at present at very low level that other factors might be even more or equally important such as species interactions, climate change, eutrophication, and changes in salinity. Therefore, to increase the resilience of the ecosystem, including fish populations, against pressures from human activities and climate change, fisheries management needs to consider the direct impacts of fishing on fished resources and marine habitats, as well as incidental impacts from fishing and other pressures within the context of the entire marine ecosystem. The interactions between different sea users should also be considered in fisheries management (such as dredging, sand and gravel extraction, offshore wind renewable installations). In addition, an ecosystem-based fisheries management should also account for both the prey/predator relationship and harvesting patterns, and how environmental conditions affect the conditions of the stocks.

The BSAC is of the opinion that it is a matter of urgency to estimate and quantify the effects of species interactions. An ecosystem-based advice still needs to be further developed and implemented.

In recommending the fishing opportunities for the Baltic stocks, **the BSAC** members have taken into account both environmental and socio-economic considerations intending to ensure that fishing practices are sustainable while supporting the livelihoods of people in the fishing sector, to ensure a viable sector for the future.

Over recent decades, the rapid growth of seal and cormorant populations have caused substantial challenges to fisheries in the Baltic. Seals and cormorants are considered a major challenge to the profitability of fisheries sector in the region. In October 2024, **the BSAC members** reached consensus on recommendations for the management of seals and cormorants[25]. We emphasize the need for improved cooperation among Member States and stakeholders, along with cross-border efforts for regular monitoring and regional management of these species. The BSAC recommends the European Commission and Baltic Member States to work together to help fund especially preventive measures. A regional approach to the management of predators is important.

[24] ICES ecosystem overview Baltic Baltic sea ecosystem overview
[25] BSAC recommendations on seals and cormorants

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Cod SDs 22-24

The BSAC recommends that the 2026 TAC for cod in SDs 22-24 should be a rollover of the 2025 bycatch TAC of **266 tonnes** (commercial catches). **The BSAC** considers that a bycatch TAC for cod is needed to enable other fisheries to continue.

A group of NGOs[26] recommends that the TAC for 2026 should be set at zero for all targeted cod fishing in SDs 22-24.

The fisheries representatives find it striking that the good recruitment from year class 2022 disappeared from the stock before they entered the fishable biomass, which was expected to happen in 2024. The reasons behind this lack of recruitment must be investigated and if suspicions about cormorant predation being the cause of the extremely high natural mortality are confirmed, management of the fishery must take account of this. **The fisheries representatives** calls for introducing seal and cormorant management without delay and adopt of the Framework towards development of a European Management Plan for the Great Cormorant[27]. **Some NGO representatives** highlight that scientists from the Thünen Institute in Germany explain the lack of cod recruitment by a combination of warming sea temperatures and eutrophication, which in turn affect the cod's habitats, prey availability and health condition (growth and weight).

Some fisheries representatives from Sweden[28] highlight that fishing closure affects the pelagic fisheries as well. However, science is lacking to prove that pelagic fisheries impact cod during their spawning period. They believe this is enough to allow pelagic fishers to fish during the closures.

The fisheries representatives from Denmark[29] propose that the following exemption to be added to the relevant article, which in 2025 is listed as Article 7 of Regulation 2024/2903 under point 2(d) and 4(e):

• *Union fishing vessels, using gears listed in Article 3 of Commission Delegated Act 2018/306, as long as all catches of cod are not landed.*

This addition ensures that a low-impact fishery can be conducted, where bycatches of cod are extremely limited and also covered by an exemption from the landing obligation due to high survival rates for all vessels, regardless of size or the area in which the fishery is conducted.

Some small-scale fisheries representatives[30] support the rollover of the 2025 TAC for western cod (bycatch quota of 340 tonnes), on the condition that the quota is allocated to fishers who use passive gears. They support the spawning closure as laid down in Article 7.3 and Article 7.4 c of the Council regulation fixing the fishing opportunities applicable to the Baltic Sea.[31]

A group of NGOs[32] also recommends developing a rebuilding plan to ensure rapid recovery above B_{MSY}, implementing habitat restoration efforts, focused on the reduction of eutrophication to improve bottom oxygen content, as advised by ICES, increasing 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. **A**

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[26] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation

[27] Cowx IG, Jepsen N, Van Anrooy R (2025). Framework towards development of a European Management Plan for the Great Cormorant. Draft – May 2025. https://openknowledge.fao.org/server/api/core/bitstreams/ae045ae8-dfbe-47d9-b733-b062cfd4a83c/content

[28] Swedish Fishermen PO, Swedish Pelagic Federation PO

[29] Danish Fishers PO

[31] Council Regulation (EU) 2024/2903 of 18 November 2024 fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2025 and amending Regulation (EU) 2024/257 as regards certain fishing opportunities in other waters

[32] BalticWaters, Baltic Salmon Rivers Association, CCB, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation

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group of NGOs additionally calls on managers to ensure that any vessels fishing for flatfish are conditioned to use gears that successfully minimises cod bycatch and introduce additional measures to avoid and minimise cod bycatch in any fisheries using active gears. They also recommend setting the plaice TAC well below the respective single-stock headline advice in order to prioritise cod protection and recovery, introducing trawl-free areas in essential cod habitats and spawning areas and continuing with recreational measures agreed for 2025.

The representatives of recreational anglers[33] recommend preserving the recreational fishing opportunities for cod in 2026. They also recommend[34] a combination of management measures that ensure equivalent protection at simultaneous higher anglers' satisfaction: introduce a maximum landing size for anglers, increase the minimum landing size and combine both with seasonal closures and bag limits; intensify 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. Anglers suggest implementation of a combination of catch measures (min and max landing sizes + bag limit), which would result in the same level of protection for cod while preserving recreational fishing opportunities.

The fisheries representatives as well as representatives of recreational anglers support the adoption of the Framework towards development of a European Management Plan for the Great Cormorant[35] to reduce the impact of cormorant predation on cod stocks.

The NGO representatives do not support measures that reduce the number of cormorants in order to reduce the impact of cormorant predation on cod stocks. Instead, NGO call on Member States to urgently implement the ICES advice on habitat restoration efforts, focused on improving bottom oxygen content.

Cod SDs 25-32

For 2026, the BSAC recommends to maintain a bycatch quota **of 595 t**, to give some opportunities for targeting other species. **The fisheries representatives are** of the opinion that immediate measures for the management of seal and cormorant populations are needed to allow the recovery of cod stock.

A group of NGOs[36] recommends combining a **zero TAC** with development of a rebuilding plan to ensure rapid recovery above B_{MSY}.

The fisheries representatives recognise 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. Despite 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 reasons behind this must be investigated and if suspicions about seal and cormorant predation being the cause of the extremely high natural mortality are confirmed, management of the fishery must take account of this and revise reference points accordingly. **The fisheries representatives** call for introducing seal and cormorant management without delay.

Some small-scale fisheries representatives[37] support the rollover of the 2025 TAC for eastern cod (bycatch quota of 595 tonnes), on the condition that the quota is allocated to fishers who use passive

[33] European Anglers Alliance (EAA), including Deutscher Angelfischerverband (DAFV)
[34] EAA position on recreational fishing for Western Baltic cod in 2026
[35] Cowx IG, Jepsen N, Van Anrooy R (2025). Framework towards development of a European Management Plan for the Great Cormorant. Draft – May 2025. https://openknowledge.fao.org/server/api/core/bitstreams/ae045ae8-dfbe-47d9-b733-b062cfd4a83c/content

[36] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation
[37] LIFE

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gears. They call for developing a cod rebuilding plan and propose a reduction of sprat and herring quota to ensure food availability and a rapid recovery of the stock above B_{MSY}.

Some Polish fishers[38] aim at recovering the state and condition of the cod as quickly as possible. However, scientific research indicates there is enough sprat and herring to feed the cod.A reduction of the sprat and herring quota will have a negative socio-economic impact and will not improve the state of the cod stocks. According to science, sprat only represents 20% - 30% of what the cod eats. It should be further investigated why cod does not feed more on sprat and herring. The data shows that nutritionally poor food in the first phase of cod development is crucial and fundamental to the state of the stock.

A group of NGOs[39] also recommends developing a rebuilding plan to ensure rapid recovery above B_{MSY}, implementing habitat restoration efforts, focused on the reduction of eutrophication to improve bottom oxygen content, as advised by ICES. They also recommend increasing 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, ensuring that any vessels fishing for flatfish are conditioned to use gear that successfully minimises cod bycatch and introduce additional measures to avoid and minimise cod bycatch in any fisheries using active gears. Additionally, the group of NGOs recommend implementing habitat restoration efforts, focused on improving bottom oxygen content, as advised by ICES, and continuing with recreational measures agreed for 2025.

Plaice in SDs 22-32

The BSAC recommends setting the 2026 TAC for plaice in SDs 22-32 in accordance with the ICES MSY approach at **10.971 tonnes.** This TAC is based on the ICES F_{MSY} catch scenario.

The BSAC draw attention to high uncertainties in the assessment after merging the two plaice stocks during the most recent benchmark. The current stock has no history of assessments to which it may be directly compared. The BSAC also notes the declining plaice weight-at-age and condition over the last years.

Some small-scale fisheries representatives[40] recommend setting the TAC for plaice in SDs 22-32 at **7,106**tonnes ((F2024 scenario) and that the plaice fishery should be conducted only with passive gears to minimise bycatch of cod, reduce discards and implement the landing obligation.

A small-scale representative from Germany underlines that any increase of the plaice quota would increase the possible bycatch of cod in the trawl fishery. In addition, increasing plaice quota does not make senses as 95% of plaice catches cannot be used for human consumption.

A group of NGOs[41] recommends that protection and recovery of both Baltic cod stocks is prioritised by setting the plaice TAC well below single-stock headline advice and in no event allowing the fishing level to increase above the F=F2024 scenario **(≤ 4,894 t)**[42]**. The corresponding catch for the F=F2024 scenario for**

[38] Fish Producers' Organisation Baltyk

[39] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation

[40] LIFE

[41] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, FANC, Fisheries Secretariat, WWF

[42] The F=F2024 scenario for plaice in SD 24-32 is 798 t (ICES 2024. Plaice (Pleuronectes platessa) in subdivisions 24-32 (Baltic Sea, excluding the Sound and Belt Seas). ICES Advice 2024 – ple.27.24-32 – https://doi.org/10.17895/ices.advice.25019438, Table 2) and for plaice SD 21-23 it is 8524 t (ICES 2024. Plaice (Pleuronectes platessa) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). ICES Advice 2024 – ple.27.21-23 – https://doi.org/10.17895/ices.advice.25019435, Table 2). The catch in SD 21 needs to be removed, and based on Table 4 this constitutes a 26% share of the catch in SD 21-23, corresponding to 8524 t x 0.26 = 2216 t. This means **the corresponding catch for the F=F2024 scenario for plaice in SD 22-32 is 798 t + (8524 t - 2216 t) = 7,106 t.** This refers to keeping F for plaice at the same level as in 2024, and must not be exceeded in order not to increase the

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plaice in SD 22-32 is 798 t + (8524 t - 2216 t) = 7,106 t. In order to minimise the bycatch impact on cod the TAC should be set even lower. They recommend additional actions such as implementing measures to improve plaice condition, such as efforts to restore habitats with a focus on improving bottom oxygen content, as recommended by ICES. They also recommend to request ICES to provide advice on relevant mixed fisheries considerations to ensure future plaice TAC-setting does not jeopardise the recovery of depleted cod stocks and to consider a spatial closure for vessels operating with bottom towed gear in SDs 22, 24, 25 and 26 where eastern Baltic cod is most abundant to avoid bycatch. They recommend to install mandatory REM on all vessels in the targeted flatfish fishery because of the high volumes of cod bycatches. The most selective fishing gears (both existing and new) designed for flatfish must be tested and used to avoid cod bycatch in the flatfish fisheries and access to the plaice TAC must be conditional on the use of such gear. They recommend managers to account for the high catches of plaice below minimum size in demersal fisheries and the increased discarding due to the decreasing condition of plaice.

Herring SDs 30-31

Some fisheries organisations recommend setting the TAC for this stock in line with the headline scientific advice, at **55,869 t**. (MAP range F_{lower})[43].

Representatives of small-scale fisheries[44] recommend setting the TAC for this stock at ≤ 25 560 t. They recommend e-DNA analysis of unsorted pelagic catches to better identify the catch composition. **Some fisheries organisations**[45] draw attention to the need to incorporate the seal and cormorant induced mortality into the stock assessment models and the need to introduce effective management measures to minimise the impact of predators on the stock. They comment that the bycatch of salmon is a rare coincidence in pelagic fishery and amounts to few individuals per year. From their point of view that is no valid argument against herring fishery.

The representatives of recreational anglers[46] Angling organisations are concerned that suggested MSY catch levels will have serious eco-system effects for wild salmon stocks.

A group of NGOs[47] recommend a 2026 TAC of no more than 25 560 t. They draw attention to the fact that to comply with the law (Art.4.6 of the Baltic MAP), the probability of the spawning stock biomass falling below Blim in 2027 must be less than 5%, corresponding to a catch of no more than 25 560 t. They recommend additional actions such as further research, e.g. on the role of Bothnian herring as part of the Baltic Sea food web. Size, species composition and location of available zooplankton could affect both size and condition of Gulf of Bothnia herring. They recommend setting TACs and implementing measures that increase the share of older fish in the stock, which over the past decade has been very low. At the current target fishing mortality rate, it is unlikely that the proportion of older individuals will increase, according to ICES. They also recommend requesting scientific advice on dividing the Gulf of Bothnia herring stock into two separately managed herring populations; a north and a south one.

Herring SD 28.1 Gulf of Riga

pressure on cod. In order to decrease the pressure on cod, the plaice TAC would have to be set substantially below his level.

[43] Federation of Finnish Fisheries Associations (FFFA), Finnish Fishermen's Association, Swedish Fishermen PO, Swedish Pelagic Federation PO

[44] LIFE

[45] Federation of Finnish Fisheries Associations (FFFA), Finnish Fishermen's Association, Swedish Fishermen PO, Swedish Pelagic Federation PO

[46] EAA

[47] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, DAFV, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation, EAA

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The BSAC recommends[48] that the 2026 TAC for Gulf of Riga herring should be set at **30,913 tonnes**, following the ICES MSY approach (also equal to MAP F_{MSY}). The corresponding TAC in the Gulf of Riga management area for 2026 would be calculated as 30,913 tonnes - 636 tonnes + 4,090 tonnes = **34,367 tonnes**.

A group of NGOs[49] recommend setting the TAC for herring in the Gulf of Riga at **≤ 27,416 t (lower F_{MSY} range)** in order to build ecosystem resilience by allowing the stock biomass to increase more substantially.

Representatives of small-scale fisheries[50] recommend setting the TAC for this stock at **≤ 27,416 t (lower F_{MSY} range).**

Herring SDs 25-29, 32, ex GoR

The BSAC recommends that the 2026 **EU TAC**[51] for herring in the central Baltic management area should be **139,532 tonnes**, which is in accordance with the MAP F_{MSY} scenario in the ICES advice. The BSAC notes that the Spawning Stock Biomass of central Baltic Herring Sea is the highest observed since 1989 and expected to increase 11.8% following the F_{MSY} scenario in the ICES advice.

A group of NGOs[52] recommend setting the 2026 TAC for this stock below 89,827 t. They draw attention that to comply with the law (Art.4.6 of the Baltic MAP), the probability of the spawning stock biomass falling below Blim in 2027 must be below 5%, corresponding to a TAC below 89,827 t. NGOs point to the fact that the ICES headline advice does take into consideration the above-mentioned legal obligation. For central Baltic herring, it is not possible to meet the legal obligation of Art 4.6 with the F ranges provided in the ICES headline advice, which lead to a 5.9-8.1% probability of SSB being below Blim in 2027. NGOs call on the Commission and the Member States to ensure that the TAC for 2026 is in line with all legal provisions, including art 4.6 of the Baltic MAP, and that in future ICES headline advice is in line with legal requirements.

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Some fisheries representatives[53] **from Sweden** propose setting the 2026 TAC in line with the MAP F lower scenario. In this case, the EU TAC would amount to **105,488 t.**

Some small-scale fisheries representatives[54] recommend setting the 2026 EU TAC at **88,707 tonnes**. This TAC is based on 0.5 F_{MSY}.

A group of NGOs[55] recommends additional actions:
- Develop a rebuilding plan to ensure rapid recovery above BMSY, for instance based on the findings of ICES WKREBUILD2including rebuilding a healthy age-size structure of the stock.
- Request ICES to provide management measures to protect the genetically vulnerable sub populations.
- Improve control, enforcement, onboard monitoring and sampling of landings to ensure that the misreporting of sprat as herring and other types of misreporting do not occur.

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[48] Estonian Fishermen's Association, Latvian Fisheries Association
[49] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, DAFV, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation,
[50] LIFE

[51] The **EU TAC** in the central Baltic management area for 2026 is calculated as: **157,996 t** (EU MAP) - Russian share 9.5% + 636 t – 4090 t) **= EU TAC 139,532 tonnes.**

[52] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, FANC, Fisheries Secretariat, WWF.
[53] Swedish Fishermen PO, Swedish Pelagic Federation PO
[54] LIFE
[55] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, FANC, Fisheries Secretariat, WWF.

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- Reserve the TAC exclusively for low-impact coastal fishers catching herring for direct human consumption.

Herring SDs 22-24

The BSAC recommends that the 2026 TAC for herring in SDs 22-24 should be set as a rollover of the 2025 TAC of **788 t.**

A group of NGOs[56] recommends a zero TAC for 2026 for this stock.

Several fisheries representatives[57] underline that the bycatch quota should not be further reduced. They draw attention to the uncertainties in the 2025 stock assessment showing a downward revision of the SSB and upward revision of the fishing mortality compared to 2024 assessment. According to the observations , made by fishers, herring is extremely abundant in the western part of the Baltic. They also point out that the western Baltic spring spawning herring is caught across three different management areas, and is composed of different stocks of which only one (Rügen herring) is being properly assessed.

A fishery representative from Denmark[58] highlights the ICES conservation consideration to protect and restore spawning habitats and the need for the member states to include this in the marine spatial planning and nature restoration efforts. Herring exhibits homing behaviour as salmon and will return to the same spawning area which is why spawning habitats are essential and particularly important to the herring stocks.

Some Polish fishers[59] underline the need to intensify studies on the mixing of herring stocks. This phenomenon has been observed by fishers for years.

Some small-scale fisheries representatives[60] recommend setting the 2026 TAC at **788 tonnes,** on the condition that the quota is allocated to fishers who use passive gears.

A group of NGOs[61] recommends developing a rebuilding plan to ensure rapid recovery above B_{MSY} and implementing additional measures to protect and restore known spawning habitats and nursery areas, as indicated in the ICES advice. They call for additional area and/or time restrictions on the herring fishery in the eastern parts of the North Sea divisions 4a, 4b and in division 3a, as catches of Western Baltic Spring herring in the fishery for North Sea herring will be inevitable. They recommend asking ICES advice on possible temporal and spatial management measures, in order to avoid by-catch of WBSS herring and secure a reduction of unwanted fishing pressure on this stock.

Sprat SDs 22-32

The BSAC recommends setting the **2025 TAC at 224,616 tonnes, in accordance with the headline advice (F_{MSY} MAP).** The corresponding **EU TAC** for 2026 would be calculated as total TAC 224,616 t minus Russian share of 10.08% = **201,975 t.** The estimated recruitment for Baltic Sea sprat is the highest observed in 10 years which is coinciding with the fishers' observations at sea. **At the same time, the BSAC** is of the opinion that the decision on 2026 TAC should be based on the latest knowledge from the spring trawl surveys**.** According to ICES the data upon which the current advice is based is uncertain until confirmed by new data.

[56] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, FANC, Fisheries Secretariat, WWF
[57] Swedish Fishermen PO, Swedish Pelagic Federation PO, DFPO
[58] Danish Pelagic PO (DPPO)
[59] Fish Producers Organisation Bałtyk
[60] LIFE
[61] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, FANC, Fisheries Secretariat, WWF

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Some other fisheries representatives[62] recommend a 2025 TAC (MAP F_{upper}) **of 230,518 t.** Taking into account the share of Russia (10.08%) this would give **EU TAC of 207,282 t.** This TAC is within the range recommended by ICES and would result in a 12% increase of the SSB in 2027.

Some fisheries representatives from Sweden[63] propose a total TAC in line with the lower range of FMSY EU MAP at 176,056 tonnes. Taking into account the Russian share of 10.08%, this would give EU TAC of **158,310 t**.

Some small-scale fisheries representatives[64] recommend a 2025 **EU TAC for sprat** at the level of **103,405 tonnes.** This is calculated as 0.5 F_{MSY}(F=0.17): 114,983 t minus 10.08% Russian share. They point to the uncertainty in the forecasts in the ICES advice (underestimated natural mortality) and the fact that recruitment is concentrated in the eastern part of the Baltic.

A group of NGOs[65] recommend managers to wait with the decision on a TAC for this stock until latest knowledge from the spring trawl surveys is available. In any case, considering that recruitment for three previous year classes (2021 – 2023) was among the lowest in the time series, combined with the uncertainty of the latest recruitment estimate, as well as the ongoing issues with misreporting and mixed fisheries considerations for sprat and herring, they emphasise that the TAC should be set well below the lower end of the F_{MSY} lower range. They recommend developing a rebuilding plan to ensure rapid recovery above B_{MSY}. They also recommend implementing spatial management and measures to account for species interactions. They recommend increasing control, enforcement, onboard monitoring and sampling of landings to ensure that the widespread misreporting of sprat as herring and of sprat as non-quota species such as flounder does not continue.

Salmon in SDs 22-31

The BSAC recommends to follow the scientific advice and to set a **total catch at 30,000 salmon** in the Gulf of Bothnia and the Åland Sea, and a zero catch from the mixed-stock at sea-fisheries in SDs 22-29, in 2026, in accordance with the ICES advice.

Some fisheries representatives from Sweden and Finland draw attention to the fact that a short fishing season recommended by ICES may prevent fishers from setting up salmon gears.

A small-scale fishery representative[66] draws attention to the need to use e-DNA analysis of pelagic catches to determine the scale of the salmon bycatch in pelagic fisheries.

The representatives of recreational anglers[67] suggest a bag limit of one salmon per fisher and day for angling at sea south of latitude 59.30 N and only national regulations should apply for salmon catch bags North of 59.30 N. They also recommend the following regulations and actions concerning Baltic salmon for 2026:

- 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.
- 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.
- An ecosystem-based and adaptive management plan for salmon must be adopted.

[62] Association of Fishermen's of Sea- PO, Association of fishermen and fish processors „Baltijos zvejas“
[63] Sweden Pelagic Federation PO (SPFPO), Swedish Fishermen PO
[64] LIFE
[65] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, DAFV, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation
[66] LIFE
[67] EAA, DAFV 2025-06-03-EAA-position-Baltic-Salmon-ICES-advice.pdf

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- Adoption of the *Framework towards development of a European Management Plan for the Great Cormorant* to reduce the impact of cormorant predation on salmon stocks.

A group of NGOs[68] recommend that there should be no targeted salmon fishery in 2026 unless the new assessment shows that this year's spawner numbers exceed the levels required to produce MSY. - The overall forecast for this year is not looking positive, and if this trend continues over the summer no fishing should be allowed. - The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

Some representatives of NGOs [69]recommend a zero catch from the mixed-stock at-sea fisheries in SDs 22 – 30 and a total catch of 5,000 reared salmon in the SD 31, in 2026, taken only from close proximity to rivers with compensatory releases. Fishing in SD 31 should be allowed after the migration period (from 1st July).

Salmon in SD 32

The BSAC recommends that the 2026 TAC for salmon in SD 32 should be no more than **11,800 salmon.** This would correspond to reported commercial landings of **no more than 10 480 salmon**.

In addition, **a group of NGOs[70]** recommends that the 2026 TAC for salmon in SD 32 should be no more than 10,480 reared salmon. They also recommend that:

- No wild salmon should be targeted in the Gulf of Finland (GoF). Salmon in the GoF can be targeted only by fishing gear that is proven to do no harm to released wild salmon bycatch.
- Salmon from GoF mix with Main Basin salmon stocks at sea. The mixed stock sea fishery must be stopped to safeguard the GoF stocks.
- The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

A representative of an NGO[71] underlines that the fishery should target only reared fin-clipped salmon to keep fisheries-related mortality on wild salmon as low as possible. Currently fishing early in the season catches a substantial number of wild salmon from Gulf of Bothnia populations. In order to avoid wild salmon, the season start should be postponed until the wild salmon from the Gulf of Bothnia has already passed the Gulf of Finland.

[68] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, EAA, FANC, Fisheries Secretariat, WWF, Swedish Society for Nature Conservation
[69] Baltic Salmon Rivers Association
[70] BalticWaters, Baltic Salmon Rivers Association, COALITION CLEAN BALTIC, FANC, Fisheries Secretariat, WWF
[71] WWF

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