Ref: BSAC 2025-26/17

Copenhagen, 12 February 2026

BSAC advice on implementation of Ecosystem-Based Approach to Fisheries Management in the Baltic Sea

Introduction

Advisory Councils were, among others, set up to provide stakeholder input to achieving the objectives of the Common Fisheries Policy (CFP). One of these objectives is that the CFP shall implement the ecosystem-based approach to fisheries management. This has been a legal requirement since 2013.

Because of the hugely complex issue the implementation of that approach is still ongoing, and the BSAC recommendations set out in this paper are aiming to help speed up this implementation.

The objective itself describes the approach from two angles. On the one hand, the negative impact of fisheries activities on the marine ecosystem must be minimised, and on the other hand, it shall endeavour to ensure that aquaculture and fisheries avoid the degradation of the marine environment[1].

While most of the BSAC recommendations below have a more traditional fisheries focus, the BSAC notes that despite many years of intensive fisheries management in the Baltic Sea, in a number of cases, this management has sadly not reached the envisaged results in terms of healthy and abundant fish stocks. The BSAC therefore believes that it can reasonably be argued that the Baltic Sea might be, more than many other marine environments, in need of a holistic approach due to its unique nature rendering it particularly vulnerable. Therefore, recommendations to further the implementation of the ecosystem-based approach to fisheries management should be accompanied by an overarching approach that authorities on all levels, be they fisheries, environmental or agricultural, should coordinate their efforts even more to allow the Baltic Sea to overcome the serious degradation it has already suffered in many places.

The BSAC recommendations

The BSAC advises that in order to implement an ecosystem-based approach to fisheries management in the Baltic Sea, the following aspects must be addressed:

1. **Adapting to changes in the ecosystem and fish stocks**
    - The Baltic Sea is a shallow and semi-enclosed brackish sea that is highly prone to natural and human induced changes. Fisheries management should follow changes in the ecosystem and fish populations and implement an adaptive and fast decision-making process at the regional level. New knowledge, such as changes in natural mortality, distribution, age and size structure of a fish stock, food web dynamics etc., should be rapidly assessed with a view to refining the provisions on fishing opportunities. The adaptive fisheries management should also support reaching good environmental status (GES) as defined in the Marine Strategy Framework

Co-funded by the European Union

Baltic Sea Advisory Council

Vester Farimagsgade 3, 1606 København, Denmark

Tel. +45 20 12 89 49 | bsac@bsac.dk | http://www.bsac.dk

Directive (MSFD) and its descriptors, hereunder on fish populations size-age structure and seabed integrity.

- The BSAC is of the opinion[2] that the Multiannual Plan for the Baltic Sea (MAP) has been counterproductive in implementing an ecosystem-based approach to fisheries management. Environmental factors and interactions need to become a more integral part of managing the fisheries. The MAP should be revised.

2. Implementing a multispecies management

- It is necessary to adopt a broader approach to fisheries management by moving away from considering single-stock yields and by requesting more comprehensive, broader-in-scope, scientific advice, including interdependence between fish species and the role of non-fish species predators such as seals[3] and cormorants[4].
- Recognize the crucial role of herring and sprat in the Baltic Sea food web as a food source for larger fish, marine mammals and seabirds.
- The BSAC sees that it is important to explore possibilities for ecosystem-based management objectives and long-term management strategies when setting fishing opportunities. It should be ensured that fisheries stock assessment models and scientific advice take into account all fishing mortality as well as other relevant pressures and that they reflect risks and uncertainties. The management strategies should include ecological reference points and regular management strategy evaluations.
- The BSAC also calls for additional science to examine the problems of potential regime shift in the Baltic.
- The BSAC urges Baltic Member States to collaborate on more effective regional management of seal and cormorant interactions with fisheries.

3. Climate change

- Climate change has and is influencing the Baltic Sea ecosystem structure and function including the fisheries. The impacts of climate change, such as rising sea water temperatures and decreasing salinity, should be urgently incorporated into management decisions to adapt fisheries management to the observed and expected changes in the fish stocks, their recruitment and habitat availability and in the ecosystem as a whole. Precautionary management is essential as the full impact of climate change on the marine ecosystem and its fish populations is not fully understood.
- In addition to including the impacts of climate change on fish populations in decision making, the BSAC also points to the need to mitigate the effects of climate change. Restoring fish populations and marine habitats will make the Baltic Sea more resilient to handling the effects of the climate crisis, whilst also being able to better mitigate the negative impacts. The BSAC also calls for more studies on carbon sinks in the Baltic Sea.

4. Interactions between land, sea uses and implementing a holistic approach

Co-funded by the European Union

Baltic Sea Advisory Council
Vester Farimagsgade 3, 1606 København, Denmark
Tel. +45 20 12 89 49 | bsac@bsac.dk | http://www.bsac.dk

- Land-based nutrient loading together with climate change and contaminants is a major driver for changes in the Baltic Sea ecosystem and calls for improved water management measures. Any efforts on and in the water must go hand in hand with efforts on land. This points to the need to improve agricultural policies and the implementation of the Water Framework Directive, as well as to foster a broader, holistic governance approach.
- The CFP alone cannot deal with all the improvements needed. An integrated approach aimed at enhancing synergies between fisheries and environmental policies is needed. There is an urgent need to establish a governance framework to resolve user conflicts and to enable region-specific solutions.
- Marine Spatial Planning policies, (Blue/Green) Energy policies, and other sectoral policies should also take into account their direct and cumulative impacts on the marine ecosystem, the fish stocks and the fisheries when implemented. In addition to national marine spatial plans, a regional one should be developed to ensure that new activities do not add more pressure on the marine ecosystem and that existing ones are sustainable. The BSAC has already made extensive recommendations regarding the development of offshore windfarms and the risk they can pose[5].

5. **Minimizing the unwanted/undesired effects of fishing on protected species and habitats**
   - The BSAC has repeatedly called for more selective gears being made available in the Baltic, and for faster processes for the approval of such gears, and at the same time pointed to the need for the correct formulation and interpretation of the rules on technical measures concerning gear designs and the need to consult the fisheries sector on the Delegated and Implementing Acts to Technical Measures Regulation.
   - BSAC supports balanced, adaptive, evidence-based spatial management measures to be implemented in line with the EU Biodiversity strategy and Nature Restoration Regulation. BSAC sees it as crucial that the measures' effectiveness is carefully and regularly evaluated.
   - The BSAC recommends fisheries managers to formulate management objectives that follow the ecosystem-approach and incorporates additional ecological objectives (e.g. securing food base for predator species), beyond the harvest-related objectives for the target species.

6. **Rebuilding of fish stocks**
   - Most of the commercial fish stocks in the Baltic Sea are below the healthy biomass levels. This makes the rebuilding of fish stocks a priority in the Baltic Sea. The BSAC agrees that the current system of scientific advice should include more options and include an explanation of the consequences of each catch option. The unsuccessful rebuilding of the Baltic cod stocks exemplifies the ineffective framework provided for by the current decision-making process.
   - Strategies for the active rebuilding of depleted fish stocks (ie. recovery plans), should be developed to support rapid recovery of the fish stocks and biodiversity. The recovery plans should set clear recovery target timelines, address all the relevant

Co-funded by the European Union

Baltic Sea Advisory Council
Vester Farimagsgade 3, 1606 København, Denmark
Tel. +45 20 12 89 49 | bsac@bsac.dk | http://www.bsac.dk

pressures and include additional measures such as protecting and restoring essential fish habitats, aligned with the 30x30 targets agreed under the 2022 Global Biodiversity Framework, and the EU Nature Restoration Regulation (NRR). BSAC highlights the need to improve the use and interpretation of marine science to enhance stock replenishment strategies.

7. **Stakeholder involvement and transparency in decision making**
    - Knowledge from fishers and other stakeholders (recreational fishers, fishing right owners, NGOs, recreational users of the sea e.g. divers) is essential. Dialogue and co-operation between scientists and stakeholders is very important and facilitates carrying out effective data collection programmes. Stakeholders are willing to cooperate with the scientists and would like the data they deliver to be used in decision-making processes without delay.
    - The BSAC highlights the huge scientific knowledge needs when it comes to including ecosystem considerations in fish stock modelling. This is key to implementing the ecosystem-based approach to fisheries management (EBFM).

In the light of the above, the BSAC suggests the following next steps:

- Authorities on all levels, be they fisheries, environmental or agricultural, should coordinate their efforts to allow the Baltic Sea to overcome the serious degradation it has already suffered in many places.
- The MAP should be revised to address changes in the ecosystem and fish populations and implement a precautionary, adaptive and fast decision-making process at the regional level that implements the ecosystem-based approach to fisheries management.
- A request should be made for more comprehensive, broader-in-scope scientific advice, moving away from considering single-stock yields, which includes i.a. interdependence between fish species, size and age structure of fish populations and the role of non-fish species predators such as seals and cormorants.
- The impacts of climate change on fish populations should be incorporated in to decision making and harmful consequences mitigated by restoring fish populations and marine habitats. Balanced, adaptive, evidence-based spatial management measures should be implemented in line with agreed EU goals, and the effectiveness' of the measures is carefully and regularly evaluated
- A governance framework should be established to resolve user conflicts and to enhance synergies between fisheries and environmental policies.
- A regional marine spatial plan should be developed to ensure that new activities do not add more pressure on the marine ecosystem and that existing ones are sustainable. The rules on technical measures should be revised for faster approval of more selective gears.
- Recovery plans for depleted fish stocks should be implemented.
- A platform for dialogue and co-operation between scientists and stakeholders to carry out effective data collection should be developed.

Co-funded by the European Union

Baltic Sea Advisory Council
Vester Farimagsgade 3, 1606 København, Denmark
Tel. +45 20 12 89 49 | bsac@bsac.dk | http://www.bsac.dk

- Member States must secure sufficient funding for the implementation of the EBFM. Likewise, future EU funding and grant agreements between ICES and DG MARE should prioritize funding for the implementation of the EBFM.

References:

1. Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy. Article 2.3 ("*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*.") and 4.1 (9) https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1380
2. BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea https://www.bsac.dk/wp-content/uploads/2024/02/BSAC-answer-COM-quest-MAP-report2024-2025-1.pdf
3. BSAC RECOMMENDATIONS ON SEALS https://www.bsac.dk/wp-content/uploads/2024/12/BSACrecomendation-on-seals.pdf
4. BSAC RECOMMENDATIONS ON CORMORANTS https://www.bsac.dk/wp-content/uploads/2024/12/BSACrecommendation-on-cormorants.pdf

BSAC recommendations concerning the development of offshore windfarms and fisheries interactions https://www.bsac.dk/wp-content/uploads/2023/08/BSACOffshoreWindRecommendations2023-2024-01.pdf

Co-funded by the European Union

Baltic Sea Advisory Council

Vester Farimagsgade 3, 1606 København, Denmark

Tel. +45 20 12 89 49 | bsac@bsac.dk | http://www.bsac.dk