

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 (Federation of Finnish Fisheries Associations, BalticSalmon Fund/Baltic Salmon Rivers Association, European Anglers Alliance, WWF) by the 16/01/26.

Federation of Finnish Fisheries Associations

FFFA supports the BALTFISH joint recommendation for a prolongation of the current exemption of the landing obligation for salmon caught with trap-nets and fyke-nets in 2027-2029. The recommendation is based on the best available scientific knowledge and the continuation of exemption is a necessity to the coastal fishery along the Gulf of Bothnia.

From the Baltic Salmon Fund and the Baltic Salmon Rivers Association:

The Baltic Salmon Fund and the Baltic Salmon Rivers Association have previously questioned the Finnish studies that will, among other things, form the basis for BALTFISH's upcoming decisions. Regardless of the Finnish as well as the Swedish study, the re-releases from these gears show an unacceptably high mortality in our eyes. In addition, if the catches were large, as they could have been a few years ago, management would be significantly more difficult and mortality would increase even more.

BALTFISH believes in its analysis, based on available data, that the proportion of salmon that are re-released is so small that it is not a problem.

During 2025 a total number of 159 salmon were released in the commercial trap net fishery in Finland corresponding to a discard rate of 2.2% compared to the total trap net catch of 7,189 salmon. These all stem from the Main Basin quota since no salmon were released in the Gulf of Finland salmon fishery. In Sweden, a total number of 42 salmon were released by commercial fisheries corresponding to a discard rate of 0.41% compared to the total catch of salmon.

When the quota is full and the salmon fishery is stopped, the same traps in many cases continue to fish for other species. In the same place and in the same way as during ongoing salmon fishing. Miraculously, commercial fisheries seem to be able to almost avoid catching a single salmon from one day to the next! We know, but of course we lack evidence that significantly more salmon is caught with these gears after the salmon fishery has been closed than is reported. Commercial fisheries do not want to exceed the 8% of the quota allowed as discards under any circumstances. Then they are not allowed to continue fishing for other species with these traps. If anything, this is an incentive for commercial fisheries NOT to report their discards.

It is almost impossible to control that commercial fisheries really report their discards. There would need to be on-site control when the traps are emptied, which is almost impossible along our long coastline.

Under no circumstances do we want to see, from the Baltic Salmon Fund and the Baltic Salmon Rivers Association, an extension of this exemption from the landing obligation as we know that it has a significantly greater impact on our salmon stocks than is evident from the data and reports available.

European Anglers Alliance

European Anglers Alliance opinion concerning the application for a prolongation of the current derogation from the landing obligation in the Baltic Sea as regards salmon in the Baltic Sea (ICES Subdivisions 22-32).

The European Anglers Alliance (EAA) has reviewed the application for a prolongation from 2027 to 2029 for the current derogation from the landing obligation for salmon caught in fyke nets or pontoon gears fitted either with a knotless bag (vittjanpåse) or water-hold. The EAA wishes to state the following:

Temporal Restrictions to reduce Release Mortality

If a derogation is to be granted, then the upper levels of release mortality of salmon as shown in studies by both LUKE and SLU must be avoided. An upper release mortality of 43% (Ruokonen et.al. 2023) for fish released with the water hold method is incompatible with the granting of a derogation based on high survivability. This is especially the case for a fishery on migrating fish with a risk for multiple capture and release and the associated cumulative mortality.

The EAA has long experience of angler participation in studies of the survival of released fish including salmon and we can state that if survival of released fish is to be within acceptable limits it is especially important that handling and time above water for fish is kept to a minimum. With large catches of salmon in pontoon gears the handling time before release and also mechanical damage caused to fish is increased and could easily result in mortality in the upper regions of the LUKE and SLU studies. Therefore, it is important to utilize selection and release of fish during periods when numbers of salmon are likely to be lower.

The European Anglers Alliance states that usage of the derogation should only be allowed North of SD 29N and within SD 30 and 31 after most salmon have migrated close to their natal rivers and estuaries. This would also allow for a more river specific fishery where compensatory released fish and strong wild river stocks could be harvested. A more stock specific fishery is especially important considering the extremely challenging situation many wild salmon rivers in the north currently face. The European Anglers Alliance therefore suggests that a derogation from the suggested gears should occur north of latitude SD 29N after the 17th of June. Such a temporal restriction is currently utilised within the Swedish fishery in SD 31 north of latitude 62°55'N and allows for the whitefish (*Coregonus* sp) fishery to continue in summer and autumn while at the same time increasing protection of six migrating weak wild salmon river stocks.

Improved Fisheries Control at Sea

The European Anglers Alliance notes that the derogation is dependent on several conditions including that it shall apply to a maximum of 8 % of the total annual catches of salmon, and a gear

restriction that the accompanying water hold shall be filled with water. The derogation therefore both incentivizes non-reporting of released fish and includes conditions that can only be guaranteed via fisheries control at Sea.

The Finnish Ministry of Agriculture and Forestry and the Swedish Ministry of Rural Affairs and Infrastructure in the accompanying annex to the application state that there “is no reason to believe that the figures do not represent the factual situation” and that “Salmon fishing is in both Member States heavily controlled, both with rigorous landing controls and pre-notifications of landings”. The EAA notes that while landing controls and pre notification of landing are admirable they do not in any way guarantee that the conditions of the derogation are met. The derogation requires control at Sea not landing control and should be accompanied by a plan from both nations for rigorous fisheries control at Sea.

Conclusion

Wild salmon stocks within the Baltic are under extreme stress with major reductions in the number of spawners returning to rivers during the last three years, it is therefore important to show prudence when granting any derogation for fishing on such a culturally and ecologically unique fish as salmon. The EAA believes that the application for the prolongation of the derogation should be granted only if the above suggested temporal restrictions and fisheries control measures at Sea are applied.

WWF

WWF opinion regarding the draft BALTFISH joint recommendation on Derogation from the landing obligation in the Baltic Sea establishing a discard plan as regards salmon in the Baltic Sea (ICES Subdivisions 22-32)

WWF thanks for the opportunity to provide comments, and notes that the exemption to the landing obligation should primarily be applied only in situations where the release of salmon is justified in order to protect weak salmon stocks and/or to safeguard the diversity of salmon populations. Accordingly, for example, the protection of old, large spawners, as well as the selective removal of hatchery-reared salmon in the vicinity and estuaries of weak salmon rivers, are cases in which the exemption could be applied. WWF nevertheless considers that, as a primary measure, fisheries should be regulated temporally and spatially in such a way that there is no need to release salmon.

Assessing the effectiveness of the suggested landing obligation exemption and the efficiency of its implementation is complicated by the fact that fishing practices, quota systems, and enforcement differ between Finland and Sweden. The justifications for continuing the landing obligation exemption also differ to some extent between Finland and Sweden. For example, under the current rules in Finland, the exemption to the landing obligation cannot be used for so-called selective removal of reared salmon, whereas in Sweden the derogation is considered important to allow a potential regulated fishery with trap nets targeting reared salmon. In addition, WWF considers that enforcement of the landing obligation exemption is currently inadequate, as control measures focus mainly on landing controls. WWF urges that enforcement should be strengthened by increasing inspections at sea. This would also help to verify the number of salmon discarded due to seal damage, as well as their temporal and spatial distribution.

Taking into account the current national fisheries regulations, WWF considers reasonable that the landing obligation exemption should be applied only towards the end of the fishing season, when

the national and/or fisher-specific salmon quota is being filled. In addition, it is essential that in both countries, fishing gear intended for salmon fishing is removed from the water once the quota has been reached, and that such gear is no longer set along salmon migration routes during the salmon spawning migration. For salmon taken as incidental bycatch in fisheries targeting other species, a separate bycatch quota should be allocated from the national quota, which would in turn reduce the need to release salmon. WWF also considers that minimum landing size regulation for salmon in the Gulf of Bothnia is in many respects unnecessary, as in practice all salmon caught in coastal fisheries are on their spawning migration and are therefore adult, mature individuals. Removing the minimum landing size could, in part, reduce the need to release salmon.

Furthermore, WWF notes that, according to statistics, seal damage is the main reason for the discarding of salmon. It is likely that the extent of seal damage is partly influenced by the technical characteristics of fishing gear. For example, in Finland the length of trap net leader fences (lead arm) is not regulated at all, and in many cases these fences are hundreds of metres long and can reach up to one kilometre. It is likely that a large proportion of seal damage occurs in the vicinity of these leader fences and as a result of them. WWF considers this to constitute additional fishing-induced mortality that should be studied and examined more thoroughly.