To:
European Commission, DG MARE
Swedish BALTFISH Presidency
Danish BALTFISH Presidency

Copenhagen, 26 June 2026

Ref: BSAC 2026-27/4

BSAC recommendation for creation of a Rebuilding Framework for Baltic Sea stocks.

The BSAC is of the opinion that the current situation for the majority of fish stocks cannot be improved by measures applied to the fisheries sector alone. The general Baltic Sea environment is severely degraded and is now facing major environmental challenges, such as decreasing levels of salinity, oxygen depletion and warming waters. Eutrophication remains one of the most significant problems in the Baltic Sea, although its impacts vary sub-regionally. To meet these challenges all sectors must contribute to improving the state of the Baltic Sea and rebuilding fish stocks. Applying a rebuilding framework is only one step in rebuilding fish stocks.

Currently several Baltic Sea fish stocks are under MSY $B_{trigger}$ levels and article 5.1 of the Baltic MAP states that ”when *scientific advice indicates that for a given year the spawning biomass of any of the stocks referred to in Article 1(1) is below the MSY* $B_{trigger}$*, all appropriate remedial measures shall be adopted to ensure rapid return of the stock concerned to levels above those capable of producing MSY.* Therefore according to the Baltic MAP it is necessary to adopt measures to rebuild stocks that are currently below MSY $B_{trigger}$.

During the October 2025 round table discussions between Commissioner Kadis and the BSAC management team the need for rebuilding of stocks below MSY $B_{trigger}$ was discussed and the Commissioner asked the BSAC specifically to provide input on what recovery advice from a Baltic perspective should encompass. The Council of Ministers together with the Commission later released a joint statement[1] “on the urgent need for rebuilding fisheries in the Baltic Sea” and agreeing on the need “to urgently request the International Council for the Exploration of the Sea (ICES) to provide catch advice scenarios to rebuild fish stocks”. Furthermore, ICES ACOM chair stated that while fully ecosystem-based advice is not available for the Baltic Sea it would be possible for ICES to provide rebuilding advice for some Baltic fish stocks that are currently under MSY $B_{trigger}$.

The BSAC Science Focus Group was therefore tasked with creating a recommendation for rebuilding advice from a Baltic Sea perspective. The ICES ACOM vice-chair and WKREBUILD2 co-chair Dorleta Garcia has provided scientific advice concerning rebuilding of fish stocks as the base for discussion and for the below recommended rebuilding framework.

[1] DRAFT MINUTES COUNCIL OF THE EUROPEAN UNION (Agriculture and Fisheries) 27 and 28 October 2025 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

ICES WKREBUILD state that stocks below limit reference levels have a higher risk to see their productivity and resilience further compromised as they persist in a poor state. For this reason, rebuilding strategies should trigger promptly when required[2]. Evaluation of a stock's demographic structure may help in reducing the risk of falling back into a rebuilding framework. Therefore, BSAC believes that rebuilding strategies should be triggered promptly and evaluation of a stock's demographic structure may aid in creating resilient rebuilding. To be effective, it is important that recovery advice includes a determined time frame.

The BSAC states that rebuilding advice should be seen as a bridging solution until more in-depth ecosystem-based advice is available. Adoption and usage of rebuilding advice should not hinder research and development necessary to produce such ecosystem-based advice.

The BSAC recommends that a recovery advice framework for Baltic Sea stocks should be adopted and include the following elements:

- Stocks be encompassed automatically by a rebuilding framework when they are below MSY $B_{trigger}$.
- The BSAC notes that western and eastern cod stocks are currently at such levels that rebuilding advice will not lead to a swift return to MSY levels. This is confirmed by the fact that current zero TACs is still not leading to stock improvement. The BSAC requests that further study is needed to understand what is driving the current stock development for western and eastern cod and resulting measures must be introduced to better the current situation.
- Special focus should be given to herring and sprat due to their ecological role in the food web.
- A rapid return to above MSY $B_{trigger}$ as stated in the MAP should be based on the biological characteristics of the stock, including generation time or time to sexual maturity and within the shortest, biologically feasible time frame with a realistic ambition of reaching such a goal.
- ICES should evaluate and advise on a suitable harvest control regime to achieve such a rapid return to above MSY levels.
- All tools that will aid in returning a stock to above MSY $B_{trigger}$ should be investigated and utilised, such tools could include actions such as marine habitat restoration. Responsibility for the effects of such actions shall be under decision maker's remit.
- Where it is scientifically proven that recovery is significantly hindered by predation, then local cormorant or seal management could be applied in those specific geographic areas. Non-lethal management methods should always be prioritized and fully utilized.
- Any measure implemented in a rebuilding framework including predator management should be accompanied by a scientific evaluation of its effectiveness in the rebuilding of fish stocks.

[2] Item - Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks (WKREBUILD2) - International Council for the Exploration of the Sea - Figshare

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

- A stock should be considered to be rebuilt when it has been above MSY $B_{trigger}$ for at least three consecutive years[3]. Due to their unique anadromic life cycle salmon should be considered rebuilt after one generation time. Environmental factors impacting fish populations should be included in the rebuilding advice.
- Rebuilding advice should have as a goal multiyear quota stability. [4]

[3] https://ices-library.figshare.com/articles/report/Workshop_on_guidelines_and_methods_for_the_design_and_evaluation_of_rebuilding_plans_for_category_1-2_stocks_WKREBUILD2_/24763293?file=43620351
A stock is considered to be rebuilt when it has been above MSY Btrigger for at least three consecutive years.

[4] [4] **Comment from Krzysztof Stanuch, National Chamber of Fish Producers.**

Although eutrophication remains a problem, we can say that phosphorus and nitrogen load in the Baltic Sea remain at natural background levels, while the Central Baltic is undergoing the opposite process, remaining on the border between mesotrophic and oligotrophic periods. Due to the rivers flowing into the Baltic Sea, trophic levels must be monitored, and appropriate action, regardless of the direction, may be necessary.
Regarding the automation of the recovery mechanism after exceeding the Btrigger, we oppose such a provision. We are referring to the situation with herring from several years ago, when some ICES members changed and reduced the Blim value, despite the dissenting opinion of other ICES members from Poland and Germany, who even considered this a mistake. Fortunately, the Council of Ministers did not uphold this automation, and today's situation shows that the Polish and German members (incidentally, recognized experts on Baltic pelagic fish) were right, as confirmed by the current situation of herring in the Baltic.
Therefore, we will not support this point, believing that in the event of another mistake, perhaps fuelled by political action, the consequences of such automation could be disastrous.
So, again we propose to delete this point from our recommendation maybe using the sample as explanation.

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