Europaudvalget 2008-09 EUU Alm.del Bilag 8 Offentligt



**POSITION PAPER** 

July 2008

#### For further information contact:

Ottilia Thoreson Fisheries Policy Officer WWF Sweden Ulriksdals Slott 170 81 Solna Sweden Tel: +46 8 624 74 00 Direct: +46 8 624 74 15 Fax: +46 8 85 13 29 E-mail:ottilia.thoreson@wwf.se

And

Ewa Milewska Fisheries Officer WWF Poland UI. Wiśniowa 38 02-520 Warszawa, Poland Tel. +22 849 84 69 Fax +22 646 36 72 E-mail:e.milewska@gcom.pl

# **Baltic Sea TACs and Quotas**

There is a clear trend to how the Fisheries Council has repeatedly chosen to adopt TAC and quotas higher than those recommended by scientists in order to incorporate the immediate socio-economic interests of the fishing industry without any means of evaluating objectively how the catch levels will impact on the environment or the fishing industry<sup>1</sup>. This has lead to the continued delay of the implementation of ecosystem-based fisheries management -a key commitment made by the EU Member States under the reformed Common Fisheries Policy adopted 2002.

In the advice for 2009, the International Council for the Exploration of the Sea (ICES) state that there is a clear ecosystem shift in the Baltic Sea where the physical and chemical factors of the environment and food web are affecting fish growth and recruitment<sup>2</sup>. The average weight of prey fish has decreased from 25 grams to 10 grams in the last 30 years<sup>3</sup>. A large decrease of the cod population in the Baltic Sea has cascaded down the food web influencing the whole open Baltic Sea ecosystem, from plankton eating fish to primary producers<sup>4</sup>. These findings highlight the fact that effort should be made to prevent changes in the higher food web. Hence great care must be taken to manage the Baltic stocks with precaution due to the present status with consideration to the uncertainty future environmental change will cause to this ecosystem and its consequence to the fish stocks.

WWF urges the European Commission and the Council of Fisheries Ministers to set quotas according to ICES advice and implement measures that will promote sustainable fishing practices through technical measures, rapidly reducing overcapacity and cease all illegal fishing practices. Only by adopting such measures will the chance to implement ecosystem based management of fisheries and thereby safeguard the resource the industry is dependent on be realised.

## **Fleet Capacity**

Overcapacity of around 30-40 percent still remains a major obstacle in achieving sustainability of the Baltic Sea fisheries. Fleet capacity is not incorporated into the ICES annual advice. While recent national programmes to reduce fleet size are underway, fishing capacity is still far in excess of that required to efficiently harvest fish stocks sustainably and guarantee socio-economic stability for the fishing industry<sup>5</sup>. Member States must be more efficient and swift in balancing the fleet size to match the resource available in line with the opportunities offered by the operational programme for the period 2007-2013 of the European Fisheries Fund.

## Illegal fishing (IUU) and Effective Control & Enforcement

For several years ICES and WWF have underlined the problem with IUU in the Baltic Sea. ICES conservatively estimate IUU to range within 30-45%, while unofficial numbers range from 50% and onwards. In the past year, efforts have been made to combat the problem such as the Baltic Sea Regional Advisory Council (BSRAC) conference in March 2007 where all the relevant Member States and the Commission agreed on a declaration to all take responsibility to improve control and enforcement in the Baltic Sea and the recent adoption of the IUU Regulation by the Council of Fisheries Ministers. However, progress has been varied in the Member States and illegal fishing is still occurring. Regional cooperation with cross border actions as recommended by the Court of Audit Report<sup>6</sup> would increase the region's MCS (Monitoring, Control and Surveillance) and help eliminate potential loop holes where illegal fishing still occurs.

# WWF position on Baltic TACs and Quotas

Following are WWF's recommendations and priorities for the 2008 October Council for the main demersal, pelagic and salmon fish stocks.

<sup>&</sup>lt;sup>1</sup> Court of Auditors, Special Report 7/2007, p 46, 111

<sup>&</sup>lt;sup>2</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/8%201-8%202%20Baltic%20ecosystem%20overview.pdf

<sup>&</sup>lt;sup>3</sup> 2007, Bengt Sjöstrand, Havet, Fiskbestånd I utsjön ur balans, p 94-96

<sup>&</sup>lt;sup>4</sup> Casini, M. et al (2007) Multi-level trophic cascades in a heavily exploited open marine ecosystem, Proc. R. Soc. B;

http://journals.royalsociety.org/content/200501qx31vp06r5/

<sup>&</sup>lt;sup>5</sup> COM (2007) 828 Final

<sup>&</sup>lt;sup>6</sup> Court of Auditors, Special Report 7/2007, p 51, 127

## Cod stocks

## Cod – subdivision 25-32

This year, ICES<sup>7</sup> will not be putting a zero catch advice for the eastern stock, but has advised that the long term fishing yield target of 0.3 can be attained by applying the management plan EC 1098/2007 for year 2009, which sets the fishing mortality at 0.25. Due to good recruitment of the 2003 and 2005 year classes the stock has been able to increase its Spawning Stock Biomass (SSB). However ICES still underlines that the stock is at a historical low level.

It is crucial to manage the stock wisely and give it a chance to reach a sustainable level that can benefit both the environment and the industry in the long-term. The unforeseen increase in stock biomass in this years ICES advice should not be regarded as a direct result of Member States fisheries management. Against all odds, the Baltic Sea natural conditions have been favourable for cod recruitment, opening up a golden chance to nurture the resource back into stable stock levels in the near future, given the Fisheries Council restrict the TAC. WWF recommends that the TAC is set according to the objective of attaining the long term fishing mortality target sooner than has been previously predicted by only increasing the TAC by 15%, corresponding to 44 580 tonnes.

## Cod – subdivision 22-24

ICES<sup>8</sup> considers the western stock to be at risk of reproductive capacity with the spawning stock being just below the biomass precautionary reference level and the current fishing mortality exceeding the maximum sustainable yield reference.

As long as ICES has not evaluated whether the management plan is consistent with the precautionary approach, WWF supports ICES advice on setting the TAC according to the precautionary approach. The set long term yield is to reach a fishing mortality rate no higher than 0.6, thus WWF recommends reducing the fishing pressure by at least 28% to attain this set objective, corresponding to a TAC of 13 700 tonnes.

Technical measures concerning fishing effort system, derogations for small-scale fisheries and limited allowable fishing days, which were adopted along with the management plan, will not result in direct improvements to the two cod stocks as long as overcapacity is not reduced by 50% in the Member States in the region and improvement in control and enforcement are made. Overcapacity reduction will not take effect just by altering fishing effort. According to the Court of Auditors report, overcapacity jeopardises compliance with rules and effectiveness of controls<sup>9</sup>.

# Pelagic Fish Stocks

# Herring in the Gulf of Riga

ICES<sup>10</sup> classify the stock as being harvested sustainably but overfished in terms of the maximum sustainable yield. The fishing mortality has been above Fpa for the past 10 years, but fallen below the reference level in the last two years. ICES recommend the fishing mortality for 2009 should be below 0.4 corresponding to landings of less than 31 500 tonnes.

# Herring in Sub-division 30 Bothnian Sea and Sub-division 31 Bothnian Bay

 $ICES^{11,T2}$  advice is the same as last year, to maintain the catch level to 2008, so the TAC should be less than 67 300 tonnes for the Bothnian Sea and 87 020 tonnes for the Bothnian Bay.

<sup>7</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/cod-2532.pdf

<sup>&</sup>lt;sup>8</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/cod-2532.pdf

<sup>&</sup>lt;sup>9</sup> Special Report 7/2007, p 45, 107

<sup>&</sup>lt;sup>10</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/Her-riga.pdf

<sup>&</sup>lt;sup>11</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/Her-30.pdf <sup>12</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/Her-31.pdf

## Herring in Subdivision 25-29 and 32 (excl Gulf of Riga)

In the absence of defined biomass reference points, the state of the stock cannot be fully evaluated. Based on the recent estimates of fishing mortality, ICES<sup>13</sup> classifies the stock as being harvested sustainably, and advice for a TAC of less than 147 000 tonnes.

## Herring in Subdivision 22-24 and Division IIIa

In the absence of defined reference points, the state of the stock cannot be fully evaluated. Recruitment has declined since 2003 and is currently at the lowest observed level while fishing mortality is well above the range that would lead to high long-term yields and low risk of stock depletion. ICES<sup>14</sup> advise that fishing mortality should be reduced by 59% corresponding to a TAC of 18 400 tonnes.

With no management plan in place for the four different herring stocks, it is highly recommended that the TAC for all herring stocks be set at the level recommended by ICES. Although misreporting has been reduced since 2005, due to prohibition of landing unsorted catches, there still remains an inaccuracy in catch data due to the mixed fishery with sprat. This in turn influences the assessment for the stocks. Further efforts should be made to intensify the control and enforcement in order to minimise misreporting in mixed pelagic fishery. Allowing official observers onboard on fishing trips would further improve the catch data.

## Sprat

ICES<sup>15</sup> classify this stock as at risk of being harvested unsustainably. The current fishing mortality is above that expected level required to attain the high long-term yield of 0.40. ICES recommend landings of less than 291 000 tonnes, in line with the precautionary approach. Sprat is mainly caught in a mixed fishery with herring, which causes the catch data to be imprecise in certain fishing areas and periods. Recruitment in the last 3 years has fluctuated around the long term average. Regional differences in stock abundance have caused some nations to not catch their allocated TAC.

WWF welcomes the development of a multi-annual plan for the pelagic species and suggests that individual management plan be made for the specific stocks. The plan should include protective measures such as closed areas, restriction of size/power of vessels for the pelagic species and improved control of all pelagic fisheries. While waiting for the management plan to be adopted for the pelagic fisheries of the Baltic region, WWF advocates for the TAC to be set according to the precautionary approach.

## Salmon stocks

## Salmon in the Main Basin subdivision 22-31:

The survival of post smolt has been low in recent years. Consequently there is a small number of feeding and maturing populations. ICES<sup>16</sup> recommend maintaining the low catch and fishing effort for 2009.

## Salmon Gulf of Finland subdivision 32:

ICES<sup>17</sup> advise no catch of wild salmon and fisheries should only be permitted at sites where there is virtually no chance of taking wild salmon from the Gulf of Finland along with reared salmon. Poaching must also be stopped in the rivers of this region.

Currently only 37 of 69 potential salmon rivers have wild smolt production<sup>18</sup>. The main objective of the revised Salmon Action Plan (SAP) should be to establish individual management recovery plans to primarily maintain the genetic diversity of salmon stocks for weak river populations. SAP must incorporate set objectives to reduce obstacles hindering migration and fishing pressure along with measures to eliminate poaching. In addition to open sea fisheries management, national regulations for salmon fishing must be integrated into the plan and be consistent with the overall objectives.

<sup>&</sup>lt;sup>13</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/Her-2532-Ex-Go.pdf

<sup>&</sup>lt;sup>14</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/her-3a22.pdf

<sup>&</sup>lt;sup>15</sup>http://www.ices.dk/committe/acom/comwork/report/2008/2008/spr-2232.pdf

<sup>&</sup>lt;sup>16</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/sal-2231.pdf

<sup>&</sup>lt;sup>17</sup> http://www.ices.dk/committe/acom/comwork/report/2008/2008/sal-32.pdf

<sup>&</sup>lt;sup>18</sup> http://www.helcom.fi/stc/files/Krakow2007/Biodiversity\_MM2007.pdf