

Directorate-General for Maritime Affairs
and Fisheries
[MARE-CONSULTATION-ON-FISHING-
OPPORTUNITIES@ec.europa.eu](mailto:MARE-CONSULTATION-ON-FISHING-OPPORTUNITIES@ec.europa.eu)

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Contribution to the MARE consultation on fishing opportunities for 2021

Stockholm University's Baltic Sea Centre¹ would like to submit the following comments to MARE's consultation on the Commission's communication on Fishing opportunities for 2021 under the common fisheries policy.

Summary

1. Greater consideration should be given to early warnings in the form of low recruitment.
2. Greater consideration should be given to potential interplay between local population components and the metapopulation. TACs need to be supplemented with regulations on the time and place of open sea fishing.
3. The Commission should again propose no fishing on European eels

Introduction

Although we have not yet seen the Commission evaluation of the Baltic multiannual plan as required in Article 15 of the plan, we would like to point out some weaknesses.

Judging by the poor state of some stocks and the major decreases in some quotas recommended by ICES this year, the plan must be considered a failure. This is particularly serious as it was the first multiannual plan adopted after the reform in 2013-2014 and has as such in practice served as a template for later plans.

The failure is due in part to its design, in part to its implementation. There is little evidence that Member States have shouldered the responsibility envisaged by the regionalization

¹ For more information on the Baltic Sea Centre, see <https://www.su.se/ostersjocentrum/english/>

component in the latest fisheries reform. Then again, there is also a lack of transparency in the Council and its preparatory body.

Therefore, some of the comments below have implications beyond the quotas to be set for the coming year.

Greater consideration should be given to early warnings in the form of low recruitment.

In the Baltic Sea, too much focus has been on the short-term economic situation of fishers. Too little attention has been given to recruitment in the fishing stocks. More attention to recruitment would lead to less fluctuation in TACs and better management of the stocks. This would ultimately also be to the benefit of fishers.

For example, ICES warned clearly in 2018 that recruitment was a problem for the western Baltic cod. Over 80% of the catches for 2019 were predicted to come from a single year class. That class seemed particularly strong. There were uncertainties about the strong class. The years before were particularly weak. The years after also seemed particularly weak.

Prudence would therefore suggest restraint in conserving that particular year class. Instead, it was fished down. The TAC for 2019 was increased by 70% compared with the TAC for 2018. Then the impact of the weaker year classes hit. The TAC for 2020 was decreased by 60%. This was declared to be a major hardship for the fishers, and EMFF funds were released to relieve struggling fishers.

As another example, ICES assesses that the central Baltic herring is dominated by a particularly strong year class, with particularly weak year classes before and after.

As a third example, the ICES assessment for western Baltic spring spawning herring in 2018 showed that a slight increase in spawning stock biomass was not matched by an increase in recruitment. In 2019, 2020 and 2021 ICES has recommended a 0 TAC.

In sum, in setting quotas, greater consideration should be given to early warnings in the form of low recruitment.

Greater consideration should be given to potential interplay between local population components and the metapopulation. TACs need to be supplemented with regulations on the time and place of open sea fishing.

A complicating factor in the management of the western Baltic spring spawning herring is the interplay between local population components and the metapopulation. In the 2018 advice, ICES wrote “The herring assessed in subdivisions 20–24 is a complex mixture of populations predominantly spawning in spring, but with local components spawning also in autumn and winter. The population dynamics and the relative contribution of these components is presently unknown but are likely to affect the precision of the assessment.”

In all likelihood there can be similar interactions between local population components and the metapopulation for other assessment units of Baltic herring (e.g. the central Baltic herring

and the northern Baltic herring). As with the western Baltic spring spawning herring, the population dynamics and relative contributions of these components is also little understood.

However, information from experienced locally based small-scale fishers in archipelago regions of Sweden indicate a decline in coastal components. This could be related to an increase in large-scale trawling on coastally spawning herring when they congregate to feed in open water before or after spawning. It can also have serious negative implications for the sensitive archipelago environments.

This has some similarity to the situation for the Baltic salmon. For the salmon, management has taken these dynamics into account and imposed restricted fishing on salmon in the open sea.

In sum,

- the theoretical potential for complex interactions between fishing and coastal populations,
- the environmental impacts of declining local stock components,
- the examples from other species and other stocks, together with
- the observations from experienced small-scale local fishers

should be enough, in accordance with the definition of the precautionary approach in the CFP, to trigger restrictions on large-scale fishing archipelago stock components when they congregate with others. The Commission should therefore propose such regulations as supplements to the TAC proposals.

The interactions between cod and its pelagic prey fish should also be given greater consideration. In addition to the benefits for the stocks themselves, reductions in TACs for central Baltic herring and western Baltic herring would also have positive side benefits for the ecosystem.

The Commission should again propose no fishing on European eels

The status of the European eel is still critical. ICES has again recommended that e.g. recreational and commercial fishing on eels be reduced to zero.

The Commission has proposed this in the past. Instead, temporal restrictions on eel fishing have been agreed. These temporal restrictions are not always calibrated to have the maximum benefit for silver eel escapement. Member states have not taken this approach seriously enough. As this approach has not delivered, a new approach is needed.

The Commission's evaluation of the eel regulation and eel management plans earlier this year did not show that current system has delivered. On the contrary. Regarding the restocking that plays such an important role in some Member States' management plans, the evaluation concluded that "[t]he long-term use of restocking as a key conservation measure is questioned. It seems more a short-term emergency measure until greater natural migration in freshwater is possible, given its uncertain contribution to spawner escapement and subsequent recruitment, as well as the risks involved (e.g. disease introduction, as well as mortality from poor

handling)”. The evaluation concluded that “further ambition is needed to implement the Regulation with a greater focus on non-fisheries related measures”.

As it will take time for such ambitions to result in further escapement of silver eels even in the most optimistic scenarios, it is important to take such actions as can be taken that will lead to improved escapement of silver eels in the short run. There is no justification for continued commercial fishing on eels.

On behalf of the Baltic Sea Centre at Stockholm University,