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Europêche recommendations on the Baltic Fishing Opportunities 2017 for Western Baltic Cod

Background

ICES advice will provide the basis for the Commission's proposal on fishing opportunities in the Baltic region for 2017 which will be published in the autumn. The Council will then decide the final fishing possibilities in October. This paper will focus specifically on Western Baltic Cod following the publication of ICES data.

The assessment of cod in Subdivisions 22 to 24 is very problematic yet these problems are not caused by lack of data from the fishery, but rather by the fact that science is unable to explain the observed stock development, as shown by the repeated downward revisions of biomass and consequential upward revisions of mortalities.

One of the main objectives of the CFP is to ensure socio-economic stability. Small-scale fishermen are given an explicit preferential status in the CFP. Their future viability would suffer considerably if this advice were to be implemented since including recreational fisheries data would actually allow a free, unaccounted and substantial recreational fishery to develop.



General remarks

- ICES have advised to use the MSY approach for catches of western cod which are caught in subdivisions 22-24 and have stated that these should be no more than 917 tonnes for 2017, representing a cut of **-93%** since 2016 figures:

CURRENT TAC 2016	ICES catch advice for 2017	% change between TAC and advice
12.720	917	-93

- The distribution between the subdivisions of advised western Baltic cod catch is as follows:

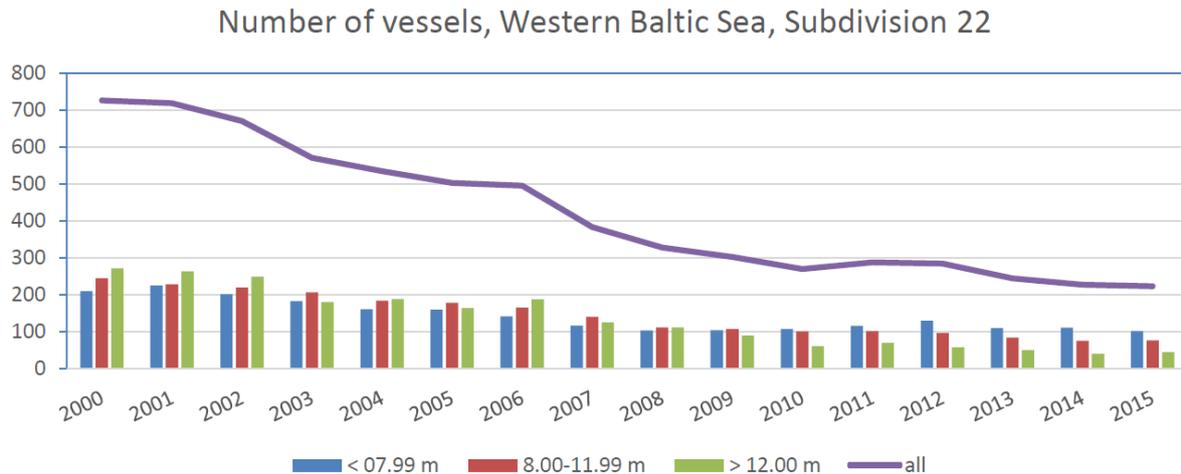
Subdivisions 22 + 23: 633 tonnes

Subdivision 24: 284 tonnes (*+ 671 tonnes from the eastern cod stock*)

- The total estimated commercial catch in 2017 for cod in subdivisions 22-24: **1588 tonnes**
- The total estimated catch for recreational fisheries in the same area is: **2558 tonnes**
- According to ICES advice, the recreational catch would be 61% higher than that of the commercial catch. Uncertainty around recreational catches is considered much higher than the uncertainty in commercial catches. yet they have been allocated the lion's share of the advised quota
- Recreational catches are underestimated for the whole time-series since they only account for German data
- By ICES including recreational catches in the advice for commercial catches, they are effectively basing their advice on something that, whilst covered by the CFP, is not actually regulated by the Common Fisheries Policy
- According to ICES own previous advice, the western Baltic cod stock has been steadily increasing and fishing mortality decreasing. The lowest registered recruitment remains a problem, but it cannot be solved by decreasing the TAC.
- The problem is not the stock, but the way the advice has been assessed. In this assessment, more data actually is giving less accurate catch advice. This should not be the case.
- The western Baltic cod stock has never been above Btrigger level due to a whole host of reasons including environmental, natural fluctuations and salinity levels but perhaps also due to the reference level being set higher than relevant. There is substantial migration between subdivisions 24 and 25 meaning it is extremely difficult to consider the stock as two separate stocks. This must be taken into account when taking decisions on management measures related to the cod stock in SDs 22-24.
- It must not be forgotten that TACs not only protect fish but also fishermen. They are a fisheries management tool, not a biological tool.

Socio-economic consequences:

- The number of active fishing vessels in the Danish Baltic fleet has been continuously reduced in the last 15 years from around 700 to just 200 vessels. Approximately less than 50 of these vessels are larger than 12m, meaning the majority belong to the small scale fleet.



- The consequences of any decrease would be severe in particular for the small-scale coastal fishery and reductions of more than 15-20 % would lead to a certain collapse of local fishing communities.
- The socio-economic effects of the ICES proposed advice would have disastrous consequences on small harbours such as Faaborg, Marstal, Soby, Bagenkop, Spodsberg and Kerteminde. After the termination of the industrial fishery for herring and sprat, these fishing communities are totally dependent on fishing for cod and plaice, flounder and dab. It is not only fishermen themselves who would be affected but the entire supply chain.
- The majority of fishing takes place during January, February and March (around 72%) and it was at this time that a 6 week fishing closure was imposed on this area. As an example, in the most important harbours of Bagenkop and Sposbjerg, just 12 vessels account for the main fishing activity. The six-week closure last year resulted in an annual loss of €493,000. This measure also had a huge knock-on effect on the profitability of the logistics of the entire operation including fish handlers, the fish auction, ice suppliers, cold store facilities etc who will be forced to close.

Recommendations

- We believe that the complete catch data should be given to Member States to decide on the quota for recreational fishermen since this does not even fall under the remit of the Common Fisheries Policy
- Given the uncertain assessment, the TAC should not solely be set in line with the wish to be at FMSY next year and being below MSY Btrigger. It should reflect the observed development in the stock and take account of the fact, that it forms the basis for the provision of food, jobs and the continued existence of vulnerable local fishing communities.
- Instead, we would favour a -20% reduction in TAC from 2016 figures. This will result in an increase of +11% Spawning Stock Biomass (SSB), and would be equal to a fishing mortality of 0,41, which would still be in line with column B of the Baltic plan and would ensure the viability of the fishing sector. To follow the radical ICES advice would be to see the demise of the vulnerable coastal communities and all interrelated industries.
- For the sake of fairness and consistency, we believe that the advice on recreational mortality should be included in the advice for natural mortality since the latter is also unregulated and therefore they can be both categorised together.
- To include recreational fishermen in the advice, at the expense of the future and existence of commercial fisheries in this area is irresponsible.