

# Joint NGO priorities on the multiannual plan for the Baltic Sea (2014/0285)

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## Summary

- **The Common Fisheries Policy (CFP) and the Marine Strategy Framework Directive (MSFD) must guide** proposals for multiannual plans by including clear provisions to achieve both Maximum Sustainable Yield (MSY) of fish stock populations and Good Environmental Status (GES) of the seas, as well as to ensure integration of the ecosystem-based approach to fisheries management (**including the non-fish species that are directly impacted by fishing activities such as seabirds and mammals**). These are highlighted **points in the inter-institutional taskforce agreement** on multiannual plans.<sup>1</sup>
- In the Baltic multiannual plan, the **recovery of the cod stocks must be given the highest priority** as cod is a predator species that greatly influences other species in the Baltic Sea and therefore its status has an impact on the whole ecosystem. The plan must ensure a healthy status of the cod stocks in accordance with Maximum Sustainable Yield and GES is maintained in the long term.
- **The Harvest Control Rules for the stocks must be right from the start.** Currently, only preliminary estimates of single species ranges have been provided by ICES. For eastern Baltic cod, ICES declared the data unfit for purpose in its latest [regular] advice, announcing a new benchmarking process in 2015. Any agreement on the plan should therefore be delayed until ICES has delivered this advice which is expected in March 2015.
- In order to provide effective management and fulfil stock conservation targets, **the plan needs to contain provisions for adaptations, including changes to Fishing Mortality (F) targets and Biomass (B) reference points** on the basis of updated scientific advice from ICES and STECF.

## Introduction

Resource overexploitation is the single most important factor directly threatening the sustainability of commercial fisheries in the EU. Furthermore, over-exploitation also increases the vulnerability of fisheries to environmental changes such as climate change. Management of fisheries through an ecosystem based approach is the solution to improve EU fisheries management, as set out in the new Common Fisheries Policy. This is meant to tackle the multiple interactions of fish species, as well as minimising the negative impacts of fisheries on the marine environment.

The European Commission's proposal for a management plan for the stocks of cod, sprat and herring in the Baltic Sea is the first multi-species plan to be delivered by the new Common Fisheries Policy.<sup>2</sup> This is a first step to address fisheries management through an ecosystem based approach, looking at multi-species interactions instead of single-species management. The three stocks interact as cod predate on sprat and herring, making the productivity of the stocks, therefore, dependent on each other.

<sup>1</sup> Task Force on multiannual plans, Final report April 2014.

[http://www.europarl.europa.eu/meetdocs/2009\\_2014/documents/pech/dv/taskfor/taskforce.pdf](http://www.europarl.europa.eu/meetdocs/2009_2014/documents/pech/dv/taskfor/taskforce.pdf)

<sup>2</sup> Proposal for a Regulation of the European Parliament and of the Council establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007.

The plan aims at taking into account the effects of the fishing activities on other species apart from the target species, in this case flatfish which occurs as by-catch in the demersal fisheries for cod. It also aims at being adaptive and leaves room for Member States and stakeholders to implement the plan in their sea basin, also empowering local stakeholders to develop technical measures. The plan contains objectives and targets on how to achieve fishing mortality levels in line with the Maximum Sustainable Yield (MSY) target. It contains biomass trigger levels, with the aim of keeping the stock at full reproductive capacity. The plan will also serve as the main instrument to implement the obligation to land all catches for cod, sprat and herring.

The Commission's proposal is a step in the right direction towards applying the ecosystem approach to fisheries, as the plan makes an attempt to consider predator-prey interactions, as well as considering the effects of the cod fisheries on flatfish, which is a common by-catch. The species interactions addressed in the MAP are however, very limited. Furthermore, the proposed multiannual plan does very little in tackling the needed measures for minimising the impact of fisheries to other non-fish species, mainly by-catch of other animals such as seabirds and mammals.

### **Achieving the objectives of the CFP and MSFD**

This management plan is the main vehicle to manage the most important commercial fish stocks in the Baltic Sea as set out in the CFP, and as such it is also the main instrument that has the capacity to achieve EU environmental targets that are influenced by fisheries. In order to enable European fish stocks to fully recover, management plans should also address the objectives to reach GES by 2020 of the Marine Strategy Framework Directive (2008/56/EC). This plan, as well as all other fisheries management plans, must therefore be strongly linked to the MSFD. The objectives should therefore clearly state that the plan will lead towards GES. Unfortunately this proposal fails to accommodate the achievement of several of the "descriptors" (i.e. objectives) in the MSFD, undermining European Union objectives of achieving good environmental status in EU waters.

Furthermore, the plan needs to apply the ecosystem based approach to fisheries management as set out in the CFP and the MSFD, and as such take wider ecosystem impacts of fisheries into account, including incidental catches of non-fish species among others.

### **Multispecies interaction – the importance of cod**

Cod is the most important key predator species in the Baltic Sea. As such cod must be the priority species in this plan as the status of the cod stocks has an impact on the entire ecosystem. Therefore a correct approach to precautionary and ecosystem based management is to secure the objectives for the cod, e.g. by setting Total Allowable Catches (TACs) on forage fish and cod to allow the cod to grow, not just in numbers, but rather in size, age and geographical distribution.

### **Fishing mortality ranges**

Fishing mortality (F) ranges set in the plan should compensate for both scientific and management uncertainties as well as for the extremely large variations in environmental conditions that occurs naturally in the Baltic Sea, as well as to effects due to climate change. FMSY should establish the upper limit of a range. In going above FMSY, fishermen only marginally generate higher long term yields while putting stocks at greater risk of collapsing and increasing inter-annual variation in fishing opportunities. However, keeping at FMSY or below, would lead to higher catches and higher catch per unit of effort (CPUE) in the mid-term, while contributing significantly to the financial sustainability of the fisheries.

The current proposal for fishing mortality ranges are based on advice from ICES that is only preliminary, so it seems premature to take decisions on long term exploitation rates without having a solid scientific basis. We are particularly worried on the impact this will have on the eastern cod

stock, where recent scientific advice implies that the stock is in a rather poor state and the exact reasons for this are not known. However, the suggested F range for the eastern stock is very high being set at 0.41-0.51 as opposed to 0.23-0.29 for the western cod stock and when compared to other cod stocks in the north Atlantic. The suggested harvest rate therefore implies that the eastern Baltic cod is perhaps the most productive cod stock in the world, which seems contradictory to the reported state of the stock. We therefore propose that decisions on the Baltic MAP should wait until new data is made available from ICES in March 2015.

### **Incidental catches of Non-fish Species**

Seabirds dive for food in the very same places targeted by commercial fishing vessels and often end up drowning while being caught on the hooks of longlines, or entangled in nets or trawls. This is referred to as 'seabird by-catch'. Seals and harbour porpoises are both present in the Baltic Sea, and are not only killed by fishing gear, but also end up destroying fisherman's nets.

Some of the relevant national information is submitted by some Baltic EU Member States under the Data Collection Regulation and is compiled by ICES. For the case of seabird by-catch, information submitted is voluntary.

These incidental catches result in the death of hundreds of thousands of seabirds and many mammals every year. This also represents a costly problem for fishermen, who want to catch fish and not birds, harbour porpoises or seals. Bird, seal and harbour porpoise safe gears and mitigation methods should also be a clear priority. The proposed plan should therefore integrate regional technical measures that can tackle the issue at regional level. Furthermore, better systematic data needs to be collected to ensure further improvements of mitigation measures.

### **Adapting the plan**

The plan mentions a review, however, this fails to specifically link to fishing mortality (F)/biomass (B) targets and reference points and their "benchmark" assessments. Therefore we propose that the European Commission must be able to adopt delegated acts as means of keeping F and B values according to updated scientific evidence. The Commission proposes to evaluate the plan every 6 years. We consider this as a too long interval and instead recommend that the plan is evaluated every 3 years, in order to be enable changes and revisions of the plan on a more frequent basis. It is important that the effects of new management measures, such as the landing obligation, are closely monitored and that plan can be updated according to the management needs that arise as an effect. The plan should also facilitate the achievement of GES through integration of MSFD programmes of measures that are currently being developed, and therefore a three year revision can better attain this.

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