Joint NGO recommendations on Baltic Sea fishing opportunities for 2025

1. INTRODUCTION

The decline of fish populations in the Baltic Sea ecosystem has by now been extensively documented and analysed. The decline has been ongoing for decades but has escalated in recent years with some fish populations collapsing and the effects of the climate crisis manifesting itself. So far any policy interventions have not been ambitious enough to reverse or even just halt the negative trends. The third HELCOM Holistic Assessment of the State of the Baltic Sea (HOLAS 3)[1] that came out last December, concludes that the ecosystem is in extreme distress and that species extraction is one of the main threats to Baltic Sea biodiversity. This year the ICES assessment shows yet again that populations of commercially harvested stocks are not in a healthy state: Both cod populations remain in a state of collapse, there is high uncertainty on the status of the herring populations, salmon is in decline and sprat has had very low recruitment for the fourth year in a row. Of the fish populations with catch advice, only the plaice spawning stock biomass is high, however alarming signals indicate a high number of small and skinny fish, leading to high levels of discards.

For cod and western herring, the assessment shows that the situation is so severe that no extraction is possible anymore and the only option is to continue to close the fishery. Even with that, it is unclear when, or if, populations will recover. This shows that ignoring the signals that scientists have been pointing out for years will have devastating results, both for fishers and the ecosystem. It is

1 HELCOM (2023): State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194.

therefore extremely concerning that the current political strategy to deal with the reduced fishing opportunities in the Baltic Sea is to remove the already weak safeguards in the Baltic Multi Annual Plan (MAP)[2] to continue fishing, even if that clearly further pushes the stocks towards the risk of collapse. We must have a management system in the Baltic Sea accounting not only for short-term fishing interest, but acknowledging and protecting ecosystem functions, and thus also fisheries, in the long term. Considering the dire state of the Baltic and its fish populations, all sectors with an impact on the ecosystem must contribute to bringing the Baltic back to a healthy and productive state. In the case of fisheries, this means adjusting fishing pressure to respect the limits of the system and minimising other impacts of fishing on the marine environment.

Overall, we urge the European Commission to propose, and fisheries ministers to adopt fishing opportunities at levels well below the ICES headline advice (and below the F_{MSY} point value where available) to safeguard ecosystem needs and dynamics and allow for the recovery of fish populations.

In light of the dire situation of the Baltic Sea ecosystem including many of its fish stocks, ministers must set Total Allowable Catches (TACs) sufficiently below the relevant ICES headline advice, both for stocks with advice based on the ICES MSY approach (where MSY-based reference points are available) and for stocks with advice based on the ICES precautionary approach for data-limited stocks, presented at the top of the respective ICES single-stock advice document, and ensure that these limits are respected. This is necessary in order to prioritise the protection and recovery of depleted stocks and to factor in additional anthropogenic pressures and ecosystem dynamics.
We must rebuild stocks and move far above current biomass levels to improve the ecosystem as well as the opportunities for coastal fishers fishing for human consumption. We propose to use ICES advice but incorporate a substantial precautionary safeguard, meaning that fishing limits should be set not at, but well below the ICES headline advice, in order to prioritise and maximise a rapid stock recovery and reflect the dire situation of the Baltic Sea ecosystem. The size of this "buffer" should vary depending on the situation of the respective stock.

Concretely this means the following:

For TAC-setting for 2025

1. Set catch limits well below the best available scientific advice provided by ICES, in order to effectively and rapidly rebuild all fish populations and ensure long-term population and ecosystem health and productivity, namely:
   a) at a fishing mortality level below the FMSY point value for stocks for which MSY reference points are available.
   b) at a fishing mortality level below ICES headline advice for stocks with advice based on the ICES precautionary approach for data-limited stocks.
2. In the absence of concrete catch scenarios in the ICES advice that are explicitly geared towards fully incorporating ecosystem needs and delivering a rapid stock recovery. We recommend to incorporate an additional level of precaution into TAC-setting, by setting all TACs well below the respective ICES headline advice. This is important to accommodate for stock-specific uncertainties, low recruitment trends, inter-species dynamics and mixed fisheries interactions as well as other pressures on the Baltic Sea ecosystem (pollution, eutrophication, climate change etc.). This could be done by deducting a precautionary safeguard amount or percentage from the headline advice catch level, the size of which would depend on population status.
3. Fully utilise the precautionary approach by closing areas with high mixing where we do not have a robust understanding of the impact on individual (sub-)populations and/or by substantially reducing quotas to safeguard depleted and vulnerable populations or sub-

2 Fisheries - correction to multiannual plans (europa.eu): https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14057-Fisheries-correction-to-multiannual-plans_en

populations and the risk of genetic depletion;[3]

4. Consider the widely recognised lack of implementation of the Landing Obligation (LO)[4] by setting TACs sufficiently below ICES catch advice to ensure illegal, unreported discarding does not lead to actual catches exceeding ICES catch advice;[5,6]

5. Provide transparent calculations for TACs based on the ICES advice on fishing opportunities.

With regards to fisheries management beyond TAC-setting

6. Underpin sustainable TAC-setting by robust controls and full catch documentation using remote electronic monitoring (REM; supported by observer coverage as appropriate) for all vessels above 12 m and for medium and high-risk vessels below 12 m.

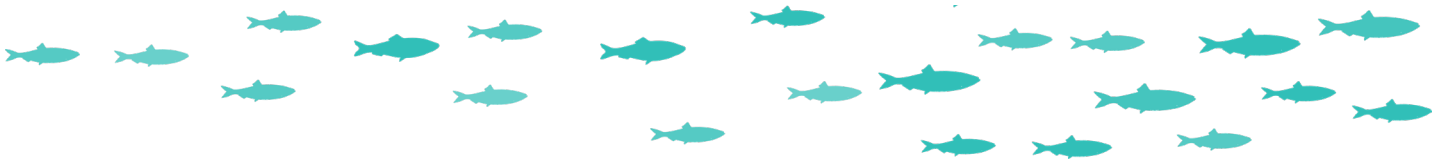
7. Develop and implement effective rebuilding plans (reflecting the findings of ICES WKREBUILD[7]) for all populations below MSY $B_{trigger}$, geared towards rapid rebuilding above B_{MSY}, including strong safeguards to prevent future population declines or stagnation below MSY $B_{trigger}$, and subject to close monitoring and enforcement using REM with cameras.

8. Prioritise and apply environmental and social criteria for national allocation of fishing opportunities, for example through incentivising use of selective fishing gear and low impact fishing practices. The European Commission should provide a precise definition of low-impact fishing, monitor compliance with Article 17 of the CFP Basic Regulation, and require the Member States to make their allocation criteria public.

9. Agree on ecosystem-based fisheries management objectives to inform the ICES advice request process[8]. International commitments on biodiversity conservation, such as Global Biodiversity Framework Directive, Baltic Sea Action Plan (BSAP) of HELCOM Commission as well as the Marine Strategy Framework Directive (MSFD) should provide a basis for these ecological objectives and be considered alongside the rules and objectives of the CFP.

10. Change the requests for ICES advice on fishing opportunities to
    a) aim for rapid recovery of depleted or at-risk stocks,
    b) fully reflect ecosystem dynamics and needs, also reflecting Good Environmental Status (GES) requirements under the Marine Strategy Framework Directive (MSFD), and multispecies considerations, and
    c) provide sufficiently precautionary alternative catch options where a full incorporation of these aspects is not yet possible, to minimise risks to stocks and the overall ecosystem.

11. Improve transparency by making publicly available any proposals subsequent to the official Commission proposal, including Commission non-papers as well as Council Working Party, AGRIFISH Council, and BALTFISH documents and minutes.



3 The principles behind ICES salmon advice that is supported the Member States supports is a good example of closing a mixed stock fishery and only allowing fishing close to their origins to mitigate risks to individual stocks or stock components.
4 COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL
https://oceans-and-fisheries.ec.europa.eu/system/files/2022-06/com-2022-253_en.pdf
5 ClientEarth, 2020. Setting Total Allowable Catches (TACs) in the context of the Landing Obligation.
https://www.clientearth.org/media/0mfjqeah/2020-07-30-setting-total-allowable-catches-tacs-in-the-context-of-the-landing-obligation-ce-en.pdf
6 Borges, L., 2020. The unintended impact of the European discard ban. ICES Journal of Marine Science, *ICES Journal of Marine Science*, Volume 78, Issue 1: 134-141, https://doi.org/10.1093/icesjms/fsaa200
7 ICES (2023). Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks (WKREBUILD2). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.24763293.v2
8 The Pew Charitable Trusts. 2024. To Improve Fisheries Management and Protect Ecosystems, Decision Makers Must Ask Better Questions.
https://www.pewtrusts.org/-/media/assets/2024/02/to-improve-fisheries-management-and-protect.pdf

2. THE CURRENT FISHERIES MANAGEMENT APPROACH IN THE BALTIC SEA HAS FAILED TO DELIVER ON THE EU'S LEGAL REQUIREMENTS

Addressing the Baltic Sea crisis hinges on the full and proper implementation of the relevant environmental legislation and international commitments when taking decisions on fishing opportunities, ensuring that targets are met, and limits respected.

Failure to end overfishing and reach Good Environmental Status by 2020

The CFP's fundamental MSY Objective in Article 2(2) of the CFP Basic Regulation explicitly applies to both fishing pressure and biomass, requiring not only that by 2020 all stocks are fished in line with (i.e. at or below) the MSY exploitation rate (F_{MSY}), but, crucially, that all stocks are maintained or restored above levels capable of producing the MSY (B_{MSY}).[9] The same objective underpins the Baltic Multiannual Plan for herring, sprat and cod where required actions for stocks under both B_{lim} and MSY $B_{trigger}$ are noted specifically[10]. Yet, the current fisheries management approach in the Baltic is not geared towards delivering such stock recovery above B_{MSY}, but rather keeps stocks around the lowest available biological reference point B_{lim}, which is far below the actual target of B_{MSY} and entails a higher risk of stock collapse, perpetuating the precarious state of the ecosystem. Therefore, it is not enough to set TACs merely not exceeding the F_{MSY} point value, but we call for more precaution in decisions on Baltic fishing opportunities to ensure rapid population recovery.

Importantly, the current approach has also failed to deliver on the requirement of the Marine Strategy Framework Directive to attain Good Environmental Status (GES) by 2020,[11] including for example in terms of fishing pressure and biomass recovery in line with MSY (see MSFD Descriptor 3), but also regarding the need to safeguard food webs (see MSFD Descriptor 4).[12]

Failure to properly implement the Landing Obligation and prevent misreporting

The Landing Obligation (LO) provides an opportunity to meet the public's demand for reducing food waste and drive the transition to more selective, ecologically sustainable, low-impact fishing. Article 15 of the CFP Basic Regulation provides Member States with a range of tools to successfully implement the LO. However, broadscale non-compliance with the LO continues to undermine the objectives of the CFP and of the MSFD, jeopardising scientific data and assessments, and has led to substantial increases in fishing mortality which threatens to implode the entire TAC management system.[13, 14] For several stocks ICES indicates that there are apparent discrepancies in the reported catches, indicating mis- or underreporting and increasing uncertainties in the assessment and advice. As long as compliance with the LO cannot be guaranteed, TACs have to be set below the catch advice by a sufficient margin to ensure that continued illegal discards do not bring fishing above sustainable levels.[15]

9 For further background on linking the law to biological reference points like FMSY and BMSY, please refer to this briefing: ClientEarth (2020). Linking the law to biological reference points used in scientific advice when setting Total Allowable Catches (TACs). December 2020. https://www.clientearth.org/latest/documents/linking-the-law-to-biological-reference-points-used-in-scientific-advice-when-setting-total-allowable-catches-tacs/

10 E,g. setting a TAC for the central herring stocks must follow the Regulation 2016/1139 and its Article 5.1 stating that "*all appropriate remedial measures shall be adopted to ensure rapid return of the stock concerned to levels above those capable of producing MSY.*"

11 For example, the MSFD implementation report produced by the European Commission in 2020 concludes that "*Biodiversity loss was not halted in Europe's seas during the first MSFD cycle*" and that "*The biodiversity of marine ecosystems is still vulnerable in Europe's seas and the good state of habitats and species is not secured*." COM(2020) 259 final, REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the implementation of the Marine Strategy Framework Directive (Directive 2008/56/EC), p. 16. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0259

12 The descriptors are described further in COMMISSION DECISION (EU) (2017/848/EU)

13 Scientific, Technical and Economic Committee for Fisheries (STECF) – 60th Plenary Meeting Report (PLEN-19-01). Publications Office of the European Union, Luxembourg, 2019, ISBN 978-92-76-02904-5,

14 Borges, L., 2020. The unintended impact of the European discard ban. ICES Journal of Marine Science, Volume 78, Issue 1, January-February 2021, Pages 134–141, https://academic.oup.com/icesjms/article/78/1/134/6026103

15 ClientEarth, 2020. Setting Total Allowable Catches (TACs) in the context of the Landing Obligation July 2020 https://www.clientearth.org/latest/documents/setting-total-allowable-catches-tacs-in-the-context-of-the-landing-obligation/

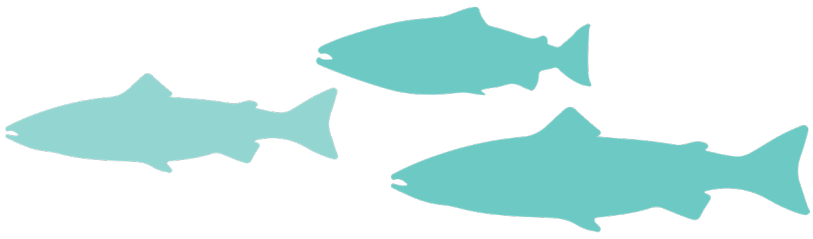
There is evidence of widespread misreporting in particular in the Central Baltic herring and Baltic sprat fisheries with the latter being landed as non-quota species such as flounder and stickleback[16]. This not only puts pressure on already depleted populations but also decreases the certainties within the ICES advice model leading to less reliable catch advice. It is essential that both onboard control and control at landing is increased to ensure catches are reported reliably. This year the EU Member States adopted a new Control Regulation[17] that mandates the use of Remote Electronic Monitoring in high-risk fisheries of non-compliance with LO. This should be implemented in the fisheries for herring and sprat in the Baltic Sea as a high priority.

As a result of an audit conducted by the European Commission showing inconsistencies on catch reporting in pelagic fisheries, several Baltic Sea Member States received instruction/recommendation to improve their catch weighing and control system.

Failure to deliver on wider environmental commitments

The European Green Deal[18] commits the EU to tackle the impacts of climate change and protect and restore biodiversity. Specifically, the EU Biodiversity Strategy[19] commits to ecosystem-based management, a transition to more selective and less damaging fishing methods, and to setting all fishing limits at or below Maximum Sustainable Yield (MSY) levels, in order to restore ocean health. The "Action Plan to conserve fisheries resources and protect marine ecosystems"[20], noted as a deliverable in the Biodiversity Strategy, has become a crucial strategy to improve implementation of, and fill gaps in, EU policies as well as to put European fisheries management on a path where the full ecosystem and climate impacts of fishing (including the bycatch of sensitive species, like the Baltic harbour porpoise or impact on the seafloor) are properly measured and mitigated.

The continued dire state of the Baltic Sea ecosystem is proof that the current approach has failed to deliver on this.



16 ICES. 2024. Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. 6:53. 584 pp. https://doi.org/10.17895/ices.pub.25764978. Also in the Swedish Verification Report from DG-MARE 30/06/2023.
17 EU control regulation, REGULATION (EU) 2023/2842 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302842
18 The European Green Deal Communication from the Commission to the European Parliament, The Council, the European Economic and Social Committee of the Regions. The European Green Deal
19 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions EU Biodiversity Strategy for 2030 - Bringing Nature Back into Our Lives
20 COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS. 21.02.2023. EU Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries

3. A MORE PRECAUTIONARY AND ECOSYSTEM-BASED APPROACH TO FISHING LIMITS AND THE SCIENTIFIC ADVICE THAT UNDERPINS THEM IS NEEDED TO ADDRESS THE BALTIC SEA CRISIS

Given the critical state of the Baltic Sea ecosystem and most of its fish stocks, fisheries management and specifically TAC-setting must urgently prioritise a rapid recovery of depleted and at-risk stocks, fully factor in ecosystem dynamics and needs, and apply extra precaution where such fully ecosystem-based scientific advice geared towards stock rebuilding is not yet available.

Insufficient precaution and recovery ambition in the current approach to TAC-setting

The political decision-making process favours short-term considerations rather than longer term sustainability, and the current system for determining fishing opportunities is not geared towards an ecosystem-based approach given the single-stock focus. Setting TACs based on single species advice fails to reflect the need to consider sub-populations at risk, lacks consideration of size and age distribution, interspecies dynamics (e.g. between sprat/herring and feed for predators like cod/salmon).It does not factor in the impact of mixed fisheries on bycatch of vulnerable or depleted stocks (such as bycatch of cod in flatfish fisheries or herring caught in sprat fisheries).

We are deeply concerned that this is not currently the case, because neither the ICES advice on fishing opportunities, nor the way decision-makers use this advice are effectively geared towards the above, but instead continue to focus on exploitation based on MSY.

A central issue is that objectives regarding stock rebuilding and ensuring ecosystem health are to date not fully reflected in the ICES advisory framework based on which ICES provides its advice on fishing opportunities. ICES developed this advisory framework[21] to translate legal requirements and objectives into concrete scientific catch advice figures, based on agreements between ICES and its advice clients, such as the EU. According to this document, ICES' approach "*integrates the precautionary approach with the objective of achieving maximum sustainable yield (MSY), unless otherwise requested*".[22]

However, while the current ICES advisory framework indeed reflects the CFP's requirement to fish stocks at or below the MSY exploitation rate, it for example does not yet explicitly incorporate key requirements under the MSFD regarding population health and food web integrity. This means that the current ICES headline advice is neither geared towards ensuring that stocks exhibit "*a population age and size distribution that is indicative of a healthy stock*" (MSFD Descriptor 3), nor that "*all elements of the marine food webs, to the extent that they are known, occur at normal abundance and diversity and levels capable of ensuring the long-term abundance of the species and the retention of their full reproductive capacity*" (MSFD Descriptor 4).

It is for the ICES advice clients, such as the EU, to explicitly request ICES to fully reflect such important policy objectives in its advice on fishing opportunities, and, where such incorporation is not yet possible in the short-term, to provide sufficiently precautionary alternative catch options geared towards minimising the risk fishing poses to stock and ecosystem health.

Moreover, while we continue to view the ICES headline advice as the best available scientific advice that must not be exceeded to meet the CFP's MSY Objective, we are concerned that the current advisory framework is not sufficiently precautionary, nor explicitly geared towards a rapid stock recovery, which is crucial in light of the dire state of many Baltic fish populations and the ecosystem

21 ICES (2023). Advice on fishing opportunities (2023). General ICES Advice guidelines. Report. https://doi.org/10.17895/ices.advice.22240624.v2
22 ICES (2023). Advice on fishing opportunities (2023). General ICES Advice guidelines. Report. https://doi.org/10.17895/ices.advice.22240624.v2. p1

as a whole. We believe that where important aspects are not (or cannot) yet be fully reflected in the ICES advice, it is the responsibility of those using this advice, such as the European Commission and the EU AGRIFISH Council, to exercise additional precaution by setting fishing limits below the advised levels.

For example, despite the clear legal requirement to maintain or restore all stocks above the biomass level capable of producing MSY (B_{MSY}), the ICES MSY approach heavily relies on the use of MSY $B_{trigger}$ as a proxy (where B_{MSY} is unknown). This is problematic a) because MSY $B_{trigger}$ can be well below B_{MSY}, and b) in the absence of better estimates it is usually set at the B_{pa} level, below which a stock is outside "safe biological limits" (i.e. there is a higher risk of the stock actually being below B_{lim}, the lowest reference point where recruitment is impaired).[23] This means this approach is from the outset aimed towards a potentially much lower biomass level than the legally required one (B_{MSY}).
Moreover, the ICES advisory framework clearly states that ICES will give catch advice even when a stock is below B_{lim} if the projection is that the Spawning Stock Biomass (SSB) of the stock will be above B_{lim} after the fishing year in question with only 50% probability,[24] i.e. when there is still a 50% risk of the stock actually remaining below B_{lim}. We do not consider this ambitious enough as it risks keeping fish populations in a precarious situation for longer than if their rapid recovery was prioritised.

Need for rebuilding plans to ensure rapid recovery above BMSY

ICES has done work to establish a workable basis for rebuilding plans through the WKREBUILD2 process[25]. ICES' proposed way forward is to establish a rebuilding plan for stocks that fall below B_{pa}. They suggest developing a harvest control rule via simulations that sets the pace for recovery. The time suggested is to use $2*T_{MIN}$, i.e. twice the calculated minimum time, T_{MIN}, needed to reach a certain biomass threshold [e.g. B_{MSY}] without any fishing at all. If there is a simulation for a harvest acceptable to reach the target, that level of fishing will be suggested. If no scenario exists that can meet the $2*T_{MIN}$ timeframe, the advice will be to close the fishery.
We suggest that the Commission and the Member States give this approach serious consideration as a way to operationalise what the Baltic Sea Multiannual Plan notes in its Article 5 on safeguards. However, a "***rapid*** *return of the stock concerned to levels above the level capable of producing MSY*" (emphasis added) requires a progressive stepwise approach with fast reduction of fishing pressure at the early stage to then increase as appropriate over time during the implementation of such a recovery scenario. Without such sequencing, the risks to the population increase as it may experience for example recruitment problems that may derail the initial projection for the time needed for recovery.

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23 Also see the explanation of B_{lim} and B_{pa} in the report on Workshop on ICES reference points (WKREF1): "*B_{lim}: A deterministic biomass limit below which a stock is considered to have reduced reproductive capacity. For stocks where quantitative information is available, a reference point B_{lim} may be identified as the stock size below which there is a high risk of reduced recruitment.* " and "B_{pa}: *A precautionary safety margin incorporating the uncertainty in ICES stock estimates leads to a precautionary reference point B_{pa}, which is a biomass reference point designed to have a low probability of being below B_{lim}.*" ICES (2022). Workshop on ICES reference points (WKREF1). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.9822, p. 9.
24 ICES (2023). Advice on fishing opportunities (2023). General ICES Advice guidelines. Report. https://doi.org/10.17895/ices.advice.22240624.v2, p.6.
25 ICES (2023). Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks (WKREBUILD2). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.24763293.v2

Safeguarding forage fish to promote recovery and ecosystem resilience

In addition there is an urgent need to improve the management of key low trophic level species in the Baltic such as European sprat and Atlantic herring stocks. These forage fish at their different life stages play a key role in the Baltic Sea ecosystem as a food source for larger fish including cod and salmon, as well as for marine mammals and seabirds. Thus the depletion of many of these small pelagic fish stocks has severe consequences for the wider ecosystem. It affects food web functionality, reduces the resilience and resistance against further environmental changes, and diminishes fishing opportunities. Fisheries that target forage fish must ensure they are being managed in a precautionary manner that reflects their ecosystem importance. Scientific literature recommends that whilst fisheries targeting other species at MSY level typically ensure that 40% of the unfished population remains in the ocean, key forage fish species should be managed at a level consistent with the ecosystem needs, which means leaving up to 75% of the unfished population in the ocean (Smith et al. 2011[26]).

The joint request from the EU and the UK to ICES on the extent to which its single-stock advice for forage fish reflects ecosystem considerations was a welcome step towards more ecosystem-based fisheries management (EBFM).[27] We strongly encourage the EU to extend this initiative to the Baltic Sea, as a basis for truly ecosystem-based fishing limits that fully take into account ecosystem dynamics[28] and needs (such as those of dependent predators like seabirds and marine mammals), as well as pressures likely to impact ecosystem health and productivity, like climate change.

Again, while fully ecosystem-based scientific advice geared towards ensuring a sufficient food supply for dependent predators is not yet available, it is the responsibility of the European Commission and EU fisheries ministers to exercise sufficient precaution by proposing and setting TACs below the ICES single-stock headline advice.

4. PRIORITISATION OF LOW IMPACT FISHING THROUGH ALLOCATION OF FISHING OPPORTUNITIES UNDER ARTICLE 17 OF THE CFP BASIC REGULATION

The way the agreed TACs are allocated across the fleet is a key tool for directing the available fishing opportunities away from environmentally damaging parts of the fleet (e.g. those with high bycatch and/or seabed impact) towards low impact fishing operations. The current allocation of fishing opportunities is almost solely based on historic criteria – those fisheries who have historically caught certain amounts of fish in the past, are often granted similar quotas also in subsequent years[29]. This reinforces the impact of large-scale and industrial fisheries often using harmful fishing practices, at the expense of small-scale low-impact fishers and fragile marine ecosystems. This paradox stresses the urgent need for new allocation of fishing opportunities that favour and prioritise fairness, sustainability, and the preservation of the ocean for future generations of fishers. In the current situation, where fishing opportunities in the Baltic are dwindling, it is essential to systematically

26 Smith, A.D., Brown, C.J., Bulman, C.M., Fulton, E.A., Johnson, P., Kaplan, I.C., Lozano-Montes, H., Mackinson, S., Marzloff, M., Shannon, L.J. and Shin, Y.J., 2011. Impacts of fishing low–trophic level species on marine ecosystems. Science, 333(6046), pp.1147-1150. https://www.science.org/doi/10.1126/science.1209395

27 The commitment to submit this request originated from the *Written Record of fisheries consultations on 09 to 13 March 2023 between the United Kingdom and the European Union about sandeels in 2023*, points 5 and 6. ICES published its response to this request on 28 November 2023, confirming that while the current ICES advice for forage fish species does include ecosystem effects to some extent, it does not include in the assessments a "*specific analysis of whether the forage fish biomass is kept high enough for specific predator requirements*", and the response also notes for North Sea sandeel that "*The existing Bescapement is not based on the needs of predators and may or may not be appropriate for ensuring a good provision of ecosystem services*". ICES (2023). EU-UK request on ecosystem considerations in the provision of single stock advice for forage fish species. ICES Advice: Technical Services. Report. https://doi.org/10.17895/ices.advice.24638433.v1 p. 1 and 4.

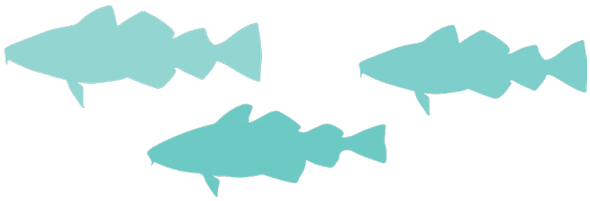
28 Trenkel, V. M., Ojaveer, H., Miller, D. C. M. & Dickey-Collas, M., 2023. The rationale for heterogeneous inclusion of ecosystem trends and variability in ICES fishing opportunities advice. In: Marine Ecology Progress Series. 704, p. 81-97 17 p. https://doi.org/10.3354/meps14227

29 Seas At Risk (2024). Allocating fishing opportunities with environmental, social, and economic criteria in mind: Examples from the EU Member States. Brussels: Seas At Risk. https://seas-at-risk.org/wp-content/uploads/2024/02/2024_Fisheries_Allocation-report_final.pdf

support small-scale low-impact fisheries, instead of continuing to favour industrial fishing for animal feed or fisheries with a history of non-compliance with CFP rules. In 2023 first attempts of an allocation of TACs based on social rather than historic criteria was done by some Member States like Germany, when TACs for Western Baltic herring were allocated to small-scale coastal fishers using passive gear, while all other fisheries for Western Baltic herring were closed. The implementation of Article 17[30] of the CFP Basic Regulation could be an essential tool to offer small-scale fisheries better opportunities and long-term stability despite the poor state of fish populations in the Baltic.

5. TRANSPARENT DECISION-MAKING

The October AGRIFISH Council deliberations happen behind closed doors, which impedes public scrutiny and accountability of decision-makers. This lack of transparency has been flagged by the EU Ombudsman who concluded that fishing opportunities documents contain 'environmental information' within the meaning of the Aarhus Convention that should be publicly available, and made recommendations to improve the transparency of the Council when setting fishing opportunities. The Ombudsman further confirmed a finding of maladministration in April 2020,[31] expressing disappointment that Council decision-making contravened key democratic and transparency standards. We therefore urge the Commission and the Council to make the decision-making process of setting fishing opportunities fully transparent and at a minimum publish all documents pertaining to the decision-making, including country positions and requests, after the Council concludes.



30 Art. 17 of the CFP: "*When allocating the fishing opportunities available to them, as referred to in Article 16, Member States shall use transparent and objective criteria including those of an environmental, social and economic nature. The criteria to be used may include, inter alia, the impact of fishing on the environment, the history of compliance, the contribution to the local economy and historic catch levels. Within the fishing opportunities allocated to them, Member States shall endeavour to provide incentives to fishing vessels deploying selective fishing gear or using fishing techniques with reduced environmental impact, such as reduced energy consumption or habitat damage*".
31 https://www.ombudsman.europa.eu/en/decision/en/127388

SUMMARY OF NGO RECOMMENDATIONS ON BALTIC SEA TACS AND ADDITIONAL MEASURES FOR 2025

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Eastern Baltic cod (SDs 25-32)[33]	595 t (by-catch only)	Precautionary Approach	0 t	n/a[34]	**0 t** - Develop a rebuilding plan to ensure rapid recovery above B_{MSY}. - Increase monitoring and control on all vessels using active gears in all areas but prioritised in cod concentration areas, combining both REM and traditional controls. - Set the plaice TAC well below the respective single-stock headline advice in order to prioritise cod protection and recovery. - Ensure that any vessels fishing for flatfish use gear that successfully minimises cod bycatch and introduce additional measures to avoid and minimise cod bycatch in any fisheries using active gears. Access to the plaice TAC must be conditional on the use of such gear. - Consider a full closure of the known spawning areas of Eastern Baltic cod during the spawning period[35] in line with the EU Marine Action Plan requirement to ensure strict protection of important fish spawning and nursery areas by 2030[36]. - Request scientific advice on the changed spawning period. - Continue with recreational measures agreed for 2024.[37]

32 For Baltic and Gulf of Finland salmon, we have interpreted ICES advice as the 'Commercial Landings' (the reported projected landings) of individual fish. This is the 'Total Commercial Sea Catch' with deductions for the unreported, misreported (i.e., IUU) and unwanted catch (i.e. seal damage and discards), as estimated by ICES.
33 ICES. 2024. Cod (*Gadus morhua*) in subdivisions 24-32, eastern Baltic stock (eastern Baltic Sea). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, cod.27.24-32. https://doi.org/10.17895/ices.advice.25019216
34 Deduct 5% Russian share from the advice for eastern Baltic cod. Deduct catches of eastern Baltic cod in SD 24 (i.e., those caught in the western Baltic cod TAC area). Not applicable with zero catch advice.
35 See for example HELCOM, 2019 "Essential fish habitats in the Baltic Sea" Meeting of the continuation of the project for Baltic-wide assessment of coastal fish communities in support of an ecosystem-based management (FISH-PRO III).
36 EU Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023DC0102%20
37 COUNCIL REGULATION (EU) 2022/2090 of 27 October 2022 fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2023 and amending Regulation (EU) 2022/109 as regards certain fishing opportunities in other waters https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R2090

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Western Baltic cod (SDs 22-24)[38]	340 t (by-catch only)	Precautionary Approach	24 t (this applies to the sum of commercial and recreational catches)	n/a	**0 t** - Develop a rebuilding plan to ensure rapid recovery above B_{MSY}. - Increase at-sea monitoring and control on all vessels using active gears in all areas but prioritised in cod concentration areas, combining both REM and traditional controls. - Set the plaice TAC well below the respective single-stock headline advice in order to prioritise cod protection and recovery. - Ensure that any vessels fishing for flatfish use gear that successfully minimises cod bycatch,[39] and introduce additional measures to avoid and minimise cod bycatches in active demersal flatfish fisheries. Access to the plaice TAC must be conditional on the use of such gear. - Introduce trawl-free areas in essential cod habitats and spawning areas, starting with ICES SD 22.
Western Baltic herring (SDs 20-24)[40]	788 t (by-catch only)	MSY Approach and Precautionary Approach	0 t	n/a	**0 t** - Develop a rebuilding plan to ensure rapid recovery above B_{MSY}. - Implement additional measures to protect and restore known spawning habitats and nursery areas, as indicated in the ICES advice. - Implement additional area and/or time restrictions on the herring fishery in the eastern parts of the North Sea divisions 4a, 4b and in division 3a, as catches of Western Baltic Spring Spawning herring in the fishery for North Sea herring will be inevitable.[41]

38 ICES, 2023. Cod (*Gadus morhua*) in subdivisions 22-24, western Baltic stock (western Baltic Sea). In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, cod.27.22-24. https://doi.org/10.17895/ices.advice.21820494. Advice on fishing opportunities for both 2024 and 2025 was given in 2023.

39 ICES states in the advice for plaice in subdivisions 21-23 that "*There are gears available that successfully reduce cod bycatches in the flatfish fisheries; however, these active gears are not currently in use. Reducing the bycatch of cod in flatfish fisheries may enhance the recovery of the cod stocks*." (ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.21-23. https://doi.org/10.17895/ices.advice.25019435

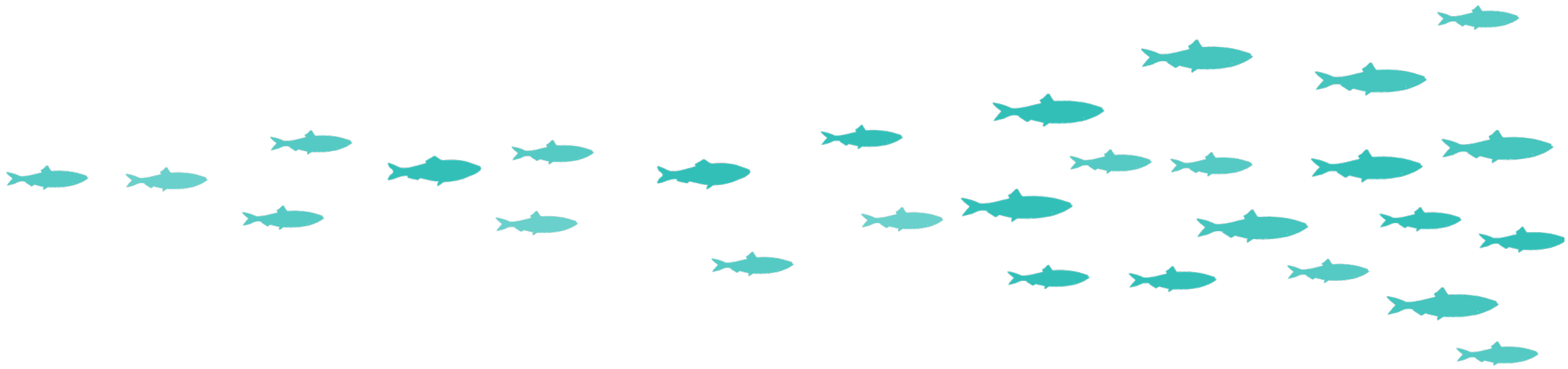
40 ICES. 2024. Herring (*Clupea harengus*) in subdivisions 20-24, spring spawners (Skagerrak, Kattegat, and western Baltic). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, her.27.20-24. https://doi.org/10.17895/ices.advice.25019273

41 ICES. 2024. Herring (*Clupea harengus*) in subdivisions 20-24, spring spawners (Skagerrak, Kattegat, and western Baltic). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, her.27.20-24. https://doi.org/10.17895/ices.advice.25019273

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Central Baltic herring (SD 25-27, 28.2, 29 and 32)[42]	40,368 t	EU MAP (F_{MSY})	125,344 t	Deduct 9,5% Russian share. Add 861 t for Gulf of Riga herring to be taken in SD 28.2 and deduct 3,263 t for Central Baltic herring to be taken in the Gulf of Riga (SD 28.1).	**n/a - Due to the degraded state of the stock and high uncertainties we cannot provide a quantitative catch recommendation, but fishing pressure should be minimised.** With the F_{MSY} point value scenario in the ICES headline advice the probability of the population staying below MSY $B_{trigger}$ in 2026 is 65% (Table 2). Sources of uncertainties and reasons for precaution: - The dire state of the stocks (below B_{lim} since 2020 and projected to remain around that critical reference point) and the overall state of the Baltic ecosystem - Sub-populations and the risk of genetic depletion - Misreporting between herring and sprat - Misreporting of herring/sprat as non-quota species, such as flounder - Russian share, estimation 27,000 t of catch 2025 - Ecosystem considerations such as the role of herring in the Baltic Sea ecosystem's foodweb. Food availability for the critically endangered Baltic Proper harbour porpoise and other predatory species. Recommended actions: - Develop a rebuilding plan to ensure rapid recovery above B_{MSY}. - Improve control, enforcement, onboard monitoring and sampling of landings to ensure that the misreporting of sprat as herring and other types of misreporting do not occur. - TAC reserved exclusively for low-impact coastal fishers catching herring for direct human consumption.

42 ICES. 2024. Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, her.27.25-2932. https://doi.org/10.17895/ices.advice.25019276

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Gulf of Riga herring (SD 28.1)[43]	37,959 t	EU MAP (F_{MSY})	39,233 t	Deduct 861 t for Gulf of Riga herring to be taken in SD 28.2 and add 3,263 t for Central Baltic herring to be taken in the Gulf of Riga (SD 28.1).	**≤ 32,796 t** - Consider setting the TAC within or below the lower F_{MSY} range (32,796 t - 41,635 t) in order to build ecosystem resilience by allowing the stock biomass to increase more substantially.
Gulf of Bothnia herring (SDs 30-31)	55,000 t	EU MAP (F_{MSY})	n/a (advice postponed)	n/a	**n/a**



43 ICES. 2024. Herring (*Clupea harengus*) in Subdivision 28.1 (Gulf of Riga). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, her.27.28. https://doi.org/10.17895/ices.advice.25019279

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Baltic sprat (SDs 22-32)[44]	201,000 t	EU MAP (F_{MSY})	164,947 t	Deduct 10,08% Russian share	**n/a - Due to the mixing with the degraded herring stocks in the central Baltic we cannot provide a quantitative catch recommendation, but emphasise that the TAC should be set below the lower end of the F_{MSY} range.** Considering that the three most recent year classes (2021 – 2023) are among the lowest in the time series, mixed fisheries considerations of sprat and herring and the well documented misreporting issues, the TAC for sprat should be set well below $F_{MSY\ lower}$ (≤ 117,071 t))[45]. - Develop a rebuilding plan to ensure rapid recovery above B_{MSY}. - To be able to set a fixed sprat TAC, spatial management and measures to account for species interactions must be put in place (e.g. by spatial or temporal limitations). - Increase control, enforcement, onboard monitoring and sampling of landings to ensure that the widespread misreporting of sprat as herring and of sprat as non-quota species such as flounder and stickleback[46] does not continue. - Take into account that the uncertainties regarding the Russian share have further increased, as no information on catches for 2022 and 2023 was officially reported to ICES.

44 ICES. 2024. Sprat (*Sprattus sprattus*) in Subdivisions 22-32 (Baltic Sea). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, spr.27.22-32. https://doi.org/10.17895/ices.advice.25019687
45 ICES. 2024. Sprat (*Sprattus sprattus*) in Subdivisions 22-32 (Baltic Sea). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, spr.27.22-32. https://doi.org/10.17895/ices.advice.25019687
46 Source Swedish Verification Report from DG-MARE 30/06/2023.

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Baltic plaice (SDs 22-32)[47] [48]	11,313 t	***Plaice SDs 21-23:*** MSY approach ***Plaice SDs 24-32:*** MSY approach	20,062 t 5,303 t	Deduct estimated catches in SD 21. Apply the same method as detailed in the ICES advice.[49]	**Prioritise protection and recovery of both Baltic cod stocks by setting the plaice TAC well below single-stock headline advice and in no event allowing the fishing level to increase (≤ 7,106 t)[50]** - Set the plaice TAC well below the single-stock headline advice to safeguard and help recover eastern and western Baltic cod, which are taken as bycatch in the flatfish fisheries. - At the very least, the fishing level must not increase, i.e. the plaice TAC must not exceed the $F=F_{2024}$ scenario (≤ 7,106 t),[51] but in order to minimise the bycatch impact on cod it should be set even lower. - ICES should be requested to provide the relevant mixed fisheries considerations. In order to inform the setting of a plaice-TAC going forward that does not jeopardise the recovery of the depleted cod stocks. - Consider a spatial closure for vessels operating with bottom towed gear in SDs 22, 24, 25 and 26 where eastern Baltic cod is most abundant to avoid bycatch of the stock, for which a zero TAC is recommended.[52] - Install mandatory REM on all vessels in the targeted flatfish fishery because of the high volumes of cod bycatches. - The most selective fishing gears (both existing and new) designed for flatfish must be tested and used to avoid cod bycatch in the flatfish fisheries,[53,54,55] and access to the plaice TAC must be conditional on the use of such gear. - Consider the high catches of plaice below minimum size in demersal fisheries and the increased discarding due to the decreasing condition of plaice.

47 ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 24-32 (Baltic Sea, excluding the Sound and Belt Seas). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.24-32. https://doi.org/10.17895/ices.advice.25019438
48 ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.21-23. https://doi.org/10.17895/ices.advice.25019435
49 ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.21-23. https://doi.org/10.17895/ices.advice.25019435.
50 The F=F2024 scenario for plaice in SD 24-32 is 798 t (ICES 2024. Plaice (*Pleuronectes platessa*) in subdivisions 24-32 (Baltic Sea, excluding the Sound and Belt Seas). ICES Advice 2024 – ple.27.24-32 – https://doi.org/10.17895/ices.advice.25019438, Table 2) and for plaice SD 21-23 it is 8524 t (ICES 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). ICES Advice 2024 – ple.27.21-23 – https://doi.org/10.17895/ices.advice.25019435, Table 2). The catch in SD 21 needs to be removed, and based on Table 4 this constitutes a 26% share of the catch in SD 21-23, corresponding to 8524 t x 0.26 = 2216 t. This means the corresponding catch for the F=F2024 scenario for plaice in SD 22-32 is 798 t + (8524 t -2216 t) = 7106 t. This refers to keeping F for plaice at the same level as in 2024, and must not be exceeded in order not to increase the pressure on cod. In order to decrease the pressure on cod, the plaice TAC would have to be set substantially below his level.
51 ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.21-23. https://doi.org/10.17895/ices.advice.25019435
52 ICES, 2020. Report on eastern Baltic cod bycatch in non-targeted fisheries, mixing with western Baltic cod in SD24, and stock situation in SDs 27-32 (Ad hoc). ICES Scientific Reports. 1:76. 69 pp
53 ICES, 2019. EU request for further information on the distribution and unavoidable bycatches of eastern Baltic cod. In Report of the ICES Advisory Committee, 2019. ICES Advice 2019, sr.2019.24.
54 ICES, 2020. Report on eastern Baltic cod bycatch in non-targeted fisheries, mixing with western Baltic cod in SD24, and stock situation in SDs 27-32 (Ad hoc). ICES Scientific Reports. 1:76. 69 pp.
55 ICES states in the advice for plaice in subdivisions 21-23 that "*There are gears available that successfully reduce cod bycatches in the flatfish fisheries; however, these active gears are not currently in use. Reducing the bycatch of cod in flatfish fisheries may enhance the recovery of the cod stocks*." (ICES. 2024. Plaice (*Pleuronectes platessa*) in subdivisions 21-23 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, ple.27.21-23. https://doi.org/10.17895/ices.advice.25019435

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Main Basin salmon 22-31[56]	53,967 salmon	MSY approach	0 for mixed stock fisheries at sea 0 for wild salmon in weak rivers in AU 5 If spatial management is used, then ≤ 40,000 salmon can be taken in the Bothnian Bay (both commercial and recreational)	Deduct 1.9% Russian share	**n/a - Recommendation postponed** **We will issue a recommendation in September 2024 once the information on the spawning population collected over the summer is available.** - The forecast for this year overall is not looking positive, if this trend continues over the summer no fishing should be allowed. - The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

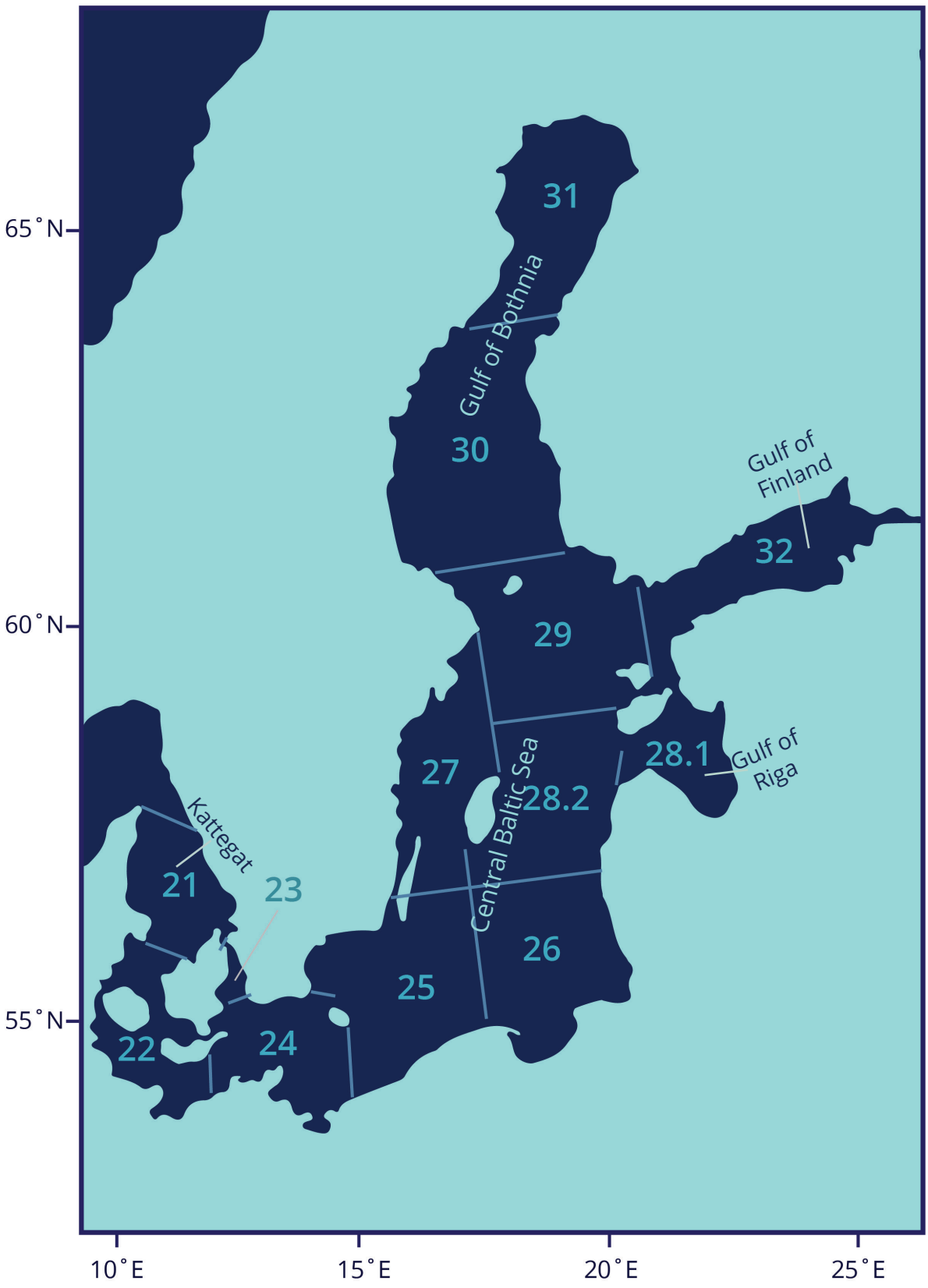
56 ICES. 2024. Salmon (*Salmo salar*) in subdivisions 22-31 (Baltic Sea, excluding the Gulf of Finland). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, sal.27.22-31. https://doi.org/10.17895/ices.advice.25019630

TAC by area-species	TAC set for 2024	ICES advice basis	ICES stock catch advice for 2025 (tonnes)[32]	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2025
Gulf of Finland salmon (SD 32)[57]	10,144 salmon	Precautionary Approach	8,118 salmon	Apply the 86% of reported landings[58] Deduct 9.3% Russian share	**≤ 8,118 salmon** - No wild salmon should be targeted in the Gulf of Finland (GoF). Salmon in the GoF can be targeted only by fishing gear that is proven to do no harm to released wild salmon bycatch. - Salmon from GoF mix with main basin salmon stocks at sea. The mixed stock sea fishery must be stopped to safeguard the GoF stocks. - The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

Note: Pending a formal sharing agreement between the EU and Russia, the assumed Russian shares are those used under the former International Baltic Sea Fisheries Commission (IBSFC)

57 ICES. 2024. Salmon (*Salmo salar*) in Subdivision 32 (Gulf of Finland). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, sal.27.32. https://doi.org/10.17895/ices.advice.25019633
58 ICES. 2024. Salmon (*Salmo salar*) in Subdivision 32 (Gulf of Finland). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, sal.27.32. https://doi.org/10.17895/ices.advice.25019633

MAP OF BALTIC SUBDIVISIONS (SDs)



Map of the Baltic Sea showing the subdivisions of the Belt, the Sound, and the Baltic for the reporting of catch statistics.

CONTACTS

Emelie Lundqvist, Senior Policy Advisor Oceans and Fisheries at Swedish Society for Nature Conservation
emelie.lundqvist@naturskyddsforeningen.se

Isabel Seeger, Policy Advisor Marine Conservation, Deutsche Umwelthilfe
seeger@duh.de

Jenni Grossmann, Science and Policy Advisor, ClientEarth
jgrossmann@clientearth.org

Johanna Fox, Director of WWF Baltic Sea Programme
johanna.fox@wwf.se

Jonny Hughes, Senior UK Marine Policy Manager, Blue Marine Foundation
jonny@bluemarinefoundation.com

Joonas Plaan, Board Member and Sustainable Fisheries Expert, Estonian Fund for Nature (ELF)
joonas.plaan@elfond.ee

Dr. Katja Hockun, Team Lead Marine Conservation and Fisheries, Deutsche Umwelthilfe
hockun@duh.de

Konrad Stralka, Executive Director, BalticWaters
konrad.stralka@balticwaters.org

Lina Birgersson, Project Manager, FishSec
lina.birgersson@fishsec.org

Nils Höglund, Marine policy officer, Coalition Clean Baltic
nils.hoglund@ccb.se

Mikael Bergh Secretary, Östersjölaxälvar i samverkan
mikael.bergh@ostersjolaxalvar.se

Rémi Cossetti, Marine Policy Officer, Seas At Risk
rcossetti@seas-at-risk.org

Dr. Robertas Staponkus, Fisheries Expert, Lithuanian Fund for Nature (LFN)
robertas.s@glis.lt

Tapani Veistola, Executive Director, Suomen luonnonsuojeluliitto (Finnish Association for Nature Conservation)
tapani.veistola@sll.fi

Thomas Johansson Chairman, Östersjölaxälvar i samverkan and Secretary General of the Baltic Salmon Fund
thomas@balticsalmonfund.com

Valeska Diemel, Fisheries Policy Officer, Bund für Umwelt und Naturschutz Deutschland e.V. (BUND)
valeska.diemel@bund.net