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## COVER NOTE

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Delegations will find attached document SWD(2024) 703 final.

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EUROPEAN  
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Brussels, 4.9.2024  
SWD(2024) 703 final

**COMMISSION STAFF WORKING DOCUMENT**  
*Accompanying the document*

**Report from the Commission to the European Parliament and the Council**

**Second report on the implementation of the Multiannual Plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, and on the delegation of powers conferred to the Commission by this Mutliannual Plan**

{COM(2024) 703 final}

This staff working document provides: (i) more details about certain chapters of the second report<sup>1</sup> on the implementation of the multiannual plan for the Baltic Sea (the ‘MAP’)<sup>2</sup>; (ii) some information about control-related aspects; and (iii) the detailed replies given in the stakeholder consultation. Like the second report itself, this document focuses on developments since 2020, and therefore does not repeat general information set out in the first report or the staff working document accompanying that first report<sup>3</sup>.

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<sup>1</sup> COM(2024) 703

<sup>2</sup> Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks (OJ L 191, 15.7.2016, p. 1).

<sup>3</sup> COM(2020) 494 final, and SWD(2020) 171 final, both of 14.9.2020.

## **1. Total allowable catch (TAC) setting**

General information about the Baltic Sea fisheries and the rules of the MAP governing the setting of TACs were presented in detail in the staff working document accompanying the first report.

The landings in the Baltic stemming from stocks covered by the MAP and for which TACs were set at  $F_{MSY}$  have reached almost 100% of total landings since 2022. This is because all stocks except eastern cod (and western cod for 2024) receive a maximum sustainable yield (MSY) assessment and TACs for these stocks are set in-line with  $F_{MSY}$ , except in the case of western herring, the targeted fisheries for which are closed. However, the annual aggregate tonnage corresponding to fishing at the  $F_{MSY}$  point value has continued to continuously decrease since 2017 from above 700 000 tonnes down to less than 500 000 tonnes for 2020 and less than 350 000 tonnes for 2024. Details are provided in the Annex. This is due to: (i) the closure of the targeted fisheries for both cod stocks, western herring and partly main basin salmon; and (ii) decreasing stock trends and hence TACs for Bothnian and central Baltic herring. The objective is to rebuild all Baltic fish stocks to healthy biomass levels.

## **2. Landing obligation**

There have not been many developments during the reporting period (2020-2023/2024). In its latest annual stock advice, ICES estimated discard rates in 2022 of 5% for eastern Baltic cod, around 23% for western Baltic cod, 36-45% for plaice, and 9-19% for flounder depending on the area.<sup>4</sup> However, ICES indicates that the sampling level has become very low, notably for eastern Baltic cod (which is mostly caught by Russia, and Russia has not reported data since 2022) but also for certain flatfish species. On plaice, ICES had previously indicated that, under certain circumstances, discards could account for up to 100% of a vessel's catch.<sup>5</sup> It should be noted that during the reporting period flatfish has become the target species in demersal fisheries as it is no longer permitted to target cod.

## **3. Ecosystem-based approach**

As set out in the staff working document accompanying the first report, the Convention on the Protection of the Marine Environment of the Baltic Sea Area ('Helcom') supports the EU Member States in implementing the Marine Strategy Framework Directive 2008/56/EC (MSFD).<sup>6</sup> Helcom updated its Baltic Sea action plan in 2021<sup>7</sup> which continues to pay special attention to eutrophication, biodiversity, hazardous substances and marine activities.

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<sup>4</sup> ICES Advice 2024 – cod.27.22-24; cod.27.24-32; ple.27.21-23; ple.27.24-32; fle.27.2223; bzq.27.2425; bwp.27.2729-32; all of 31 May 2024.

<sup>5</sup> ICES Advice 2018 – ple.27.24-32 of 31 May 2018.

<sup>6</sup> Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (OJ L164, 25.6.2008, p. 19).

<sup>7</sup> <https://helcom.fi/baltic-sea-action-plan/>.

Article 3(3) of the MAP provides that the MAP aims to ensure that the conditions of the MSFD's descriptor 3 of good environmental status are fulfilled. Descriptor 3 is directly linked to the TAC (and hence to the MAP).

As mentioned in the second report, ICES continues to be able to assess only 2 of the 3 criteria of descriptor 3 (fishing pressure and biomass, but not age-size distribution). In its latest advice<sup>8</sup>, ICES estimated that in 2022 Gulf of Riga herring and Bothnian herring were the only target stocks under the MAP fulfilling the two assessed criteria of descriptor 3; western Baltic herring fulfilled the fishing pressure criterion, and sprat the biomass criterion. On the by-catch stocks under the MAP, the situation was that: (i) plaice in areas 21-23 and 24-32 fulfilled the two criteria; (ii) the status of brill and turbot was unknown; (iii) 3 out of 4 flounder stocks fulfilled the fishing pressure criterion while the biomass criterion was unknown.

Article 3(3) of the MAP also provides that the MAP aims to contribute to the fulfilment of other relevant descriptors in proportion to the relative role played by fisheries in affecting these descriptors. On descriptor 6 (sea floor integrity), it is to be noted that the Commission's marine action plan presents actions to reduce the impact of fisheries.<sup>9</sup> ICES does not assess in detail the status of these other descriptors, but it still provides qualitative indications that go some way to show the general status of the descriptor. The staff working document accompanying the first report also contains some discussions of these other descriptors and of the impact that the ecosystem has on the fish stocks. These considerations are still valid.

#### **4. Socio-economic developments**

According to the latest Annual Economic Report of the Commission's Scientific, Technical and Economic Committee for Fisheries (STECF)<sup>10</sup>, in 2021 the Baltic fleet overall generated EUR 30 million in gross profits, a 33% decrease compared to 2020. Net profits fell even more, decreasing by 42% to EUR 6 million. The fleets of Denmark and Germany suffered net financial losses in 2021. However, the net profit of the Polish fleet improved substantially, mainly because of the improved profitability of the small-scale fleet. Revenue (income from landings and other income) generated in 2021 across the whole Baltic fleet was estimated at EUR 173 million, a decrease of 12% from the previous year. Three Member States accounted for over 60% of all revenues: Sweden and Finland (EUR 37 million each), and Poland (EUR 35 million).

The total number of days at sea has been continuously decreasing. In 2021, days at sea were only 75% of the 2013-2020 average. The total number of vessels decreased by 26% between 2013 and 2021. In 2021, small-scale coastal fisheries were responsible for 62% of total employment in the Baltic fishing fleet. Nevertheless, the large-scale fleet has been the main actor in the region and has been responsible for the majority of the landed weight and landing value. Landings from the Baltic increased slightly from 2013 to 2018. However, from 2019 to

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<sup>8</sup> ICES Advice 2022 – Baltic Sea Ecoregion Fisheries Overview, version 2 of 6 February 2023, p. 31 (<https://doi.org/10.17895/ices.advice.21646934>).

<sup>9</sup> COM(2023) 102 final of 21.2.2023, Communication from the Commission 'EU Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries'.

<sup>10</sup> STECF 23-07, Annual Economic Report of the EU Fishing Fleet, pp. 103-115.

2021 the weight of landings decreased by 7%. The value of landings decreased significantly in 2014 (due to a drop in prices for small pelagic species) and, after a slight recovery in 2015, has been continuously falling. In 2021, the value of landings decreased by a further 14% compared with 2020.

Gross value added in 2021 was estimated at over EUR 88 million, gross profit at EUR 29.4 million and net profit at EUR 6.3 million. Overall, the gross profit margin in the region fell from 23% in 2016 to 19% in 2021, with the Latvian fleet the most profitable (30% profit margin), followed by Sweden (18%) and Estonia (17%). Fuel costs continue to be one of the main drivers of the Baltic fleet's performance. In 2021, fuel consumed per landed weight of seafood, was 7% lower than in 2020 and 14% lower than the 2013-2020 average, indicating an improvement in energy efficiency of the Baltic Sea fleet.

Total employment in the Baltic Sea fishing fleet amounted to 3 301 full-time equivalents (FTEs) in 2021, a 10% reduction compared to 2020. The total number of vessels operating in the Baltic Sea fell by 26% between 2013 and 2021.

Finally, it should be mentioned that the former European Maritime and Fisheries Fund (EMFF) and current European Maritime, Fisheries and Aquaculture Fund (EMFAF) Regulations<sup>11</sup> support the CFP objectives, and therefore also support the implementation of the MAP. In this context, Member States use funds from the EMFF and EMFAF to support fisheries control and enforcement activities. Some Member States also use these two funds to help: (i) reduce fishing capacity; (ii) develop more selective fisheries; and (iii) mitigate the socio-economic impact on fishers of specific conservation measures. Based on Member States' reporting, the Commission provides annual reports on the implementation of these two funds<sup>12</sup>.

## **5. Delegation of powers to the Commission**

As set out in the staff working document accompanying the first report, an exemption from the landing obligation based on Article 7 of the MAP was adopted in 2017 by way of a delegated act based on a joint recommendation for cod and plaice caught with certain passive gears<sup>13</sup>. The relevant Member States had to provide information by March 2019 about discard-survival estimates to allow both the STECF to evaluate this exemption by August 2019 and the Commission to evaluate the exemption in the course of 2020. The Commission asked to receive

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<sup>11</sup> Regulation (EU) 508/2014 of the European Parliament and of the Council of 15 May 2014 on the European Maritime and Fisheries Fund and repealing Council Regulations (EC) No 2328/2003, (EC) No 861/2006, (EC) No 1198/2006 and (EC) No 791/2007 and Regulation (EU) No 1255/2011 of the European Parliament and of the Council (OJ L 149, 20.5.2014, p. 1); Regulation (EU) 2021/1139 of the European Parliament and of the Council of 7 July 2021 establishing the European Maritime, Fisheries and Aquaculture Fund and amending Regulation (EU) 2017/1004 (OJ L 247, 13.7.2021, p. 1).

<sup>12</sup> For the latest reports, see [https://oceans-and-fisheries.ec.europa.eu/publications/emff-implementation-report-2022\\_en](https://oceans-and-fisheries.ec.europa.eu/publications/emff-implementation-report-2022_en) and [https://oceans-and-fisheries.ec.europa.eu/publications/famenet-emfaf-implementation-report-june-2023\\_en](https://oceans-and-fisheries.ec.europa.eu/publications/famenet-emfaf-implementation-report-june-2023_en).

<sup>13</sup> Commission Delegated Regulation (EU) 2018/306 of 18 December 2017 laying down specifications for the implementation of the landing obligation as regards cod and plaice in Baltic Sea fisheries (OJ L 60, 2.3.2018, p. 1).

information on discard-survival estimates in February 2020 and again in March 2024, but so far the Member States have not yet provided any information. Furthermore, a joint recommendation for a high-survivability exemption from the landing obligation for plaice caught with other types of gears had been submitted to the Commission in 2019 but received a negative STECF assessment. A second joint recommendation was submitted in April 2022 but was also negatively assessed by the STECF<sup>14</sup> so the Commission did not adopt a delegated act.

As set out in the staff working document accompanying the first report, based on Article 8 of the MAP and a joint recommendation, a delegated act was adopted in 2017 allowing fishing operators to use a T90 codend with a smaller mesh-size in the targeted demersal cod fisheries.<sup>15</sup> It was subsequently discovered that this delegated act contained a technical error which made it impossible to build that gear according to the technical specifications set out in the delegated act, meaning that the alternative gear could not be built and used in practice. A joint recommendation to correct this mistake was adopted in 2019 and the STECF assessment<sup>16</sup> confirmed the error in the original delegated act. However, given the closure of the targeted eastern cod fisheries and the new need to develop gears which substantially reduce cod catches in demersal fisheries rather than increase them, the Commission decided in 2020 not to correct the delegated act and hence to keep it unusable in practice. Finally, based on a joint recommendation from 2021, the Commission still plans to adopt in 2024 delegated and implementing legislation which in the main cod-distribution area will make it mandatory to use gears and devices in demersal fisheries that are expected to substantially reduce by-catches of cod. However, it should be noted that the legal basis for this legislation will be the Technical Measures Regulation (EU) 2019/1241<sup>17</sup>, not the Baltic MAP.

## **6. Control and enforcement**

As set out in the staff working document accompanying the first report, the MAP contains a few specific provisions on control and enforcement in addition to the general provisions under EU rules including the Fisheries Control Regulation. In particular, the MAP contains a more lenient rule for the margin of tolerance (MoT) for unsorted landings, namely 10% of total catches instead of 10% per species. The recent revision of the Control Regulation<sup>18</sup> modified

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<sup>14</sup> STECF EWG 22-05, item 8.1, pp. 165-169.

<sup>15</sup> Commission Delegated Regulation (EU) 2018/47 of 30 October 2017 authorising the use of alternative T90 trawls in the Baltic Sea fisheries (OJ L 7, 21.1.2018, p. 21).

<sup>16</sup> STECF 60th plenary meeting report (PLEN-19-01), item 6.12, pp. 142-148.

<sup>17</sup> Regulation (EU) 2019/1241 of the European Parliament and of the Council of 20 June 2019 on the conservation of fisheries resources and the protection of marine ecosystems through technical measures, amending Council Regulations (EC) No 1967/2006, (EC) No 1224/2009 and Regulations (EU) No 1380/2013, (EU) 2016/1139, (EU) 2018/973, (EU) 2019/472 and (EU) 2019/1022 of the European Parliament and of the Council, and repealing Council Regulations (EC) No 894/97, (EC) No 850/98, (EC) No 2549/2000, (EC) No 254/2002, (EC) No 812/2004 and (EC) No 2187/2005 (OJ L 198, 25.7.2019, p. 105).

<sup>18</sup> Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control (OJ L, 2023/2842, 20.12.2023).



the MoT rule in the MAP to gradually align it to the baseline MoT rules in the Control Regulation: the MoT rule in the MAP will be 20% per species until 10 January 2028, and thereafter the baseline MoT rules will apply.

The membership of the Baltic Sea Advisory Council (BSAC) is split. Some members are of the opinion that the MoT rule has allowed significant misreporting in mixed pelagic fisheries and that this has had negative consequences for some fish stocks. Other members of the BSAC disagree. Some members argue that the new MoT rules are too restrictive and cannot be implemented. The Member States responding to the consultation are divided, as two think that the MoT rule has not had – nor will have – many effects on fish stocks, while one is of the view that the effects of the MoT rule will be significant. One Member State stresses that the new MoT rules are likely to be difficult to implement in some fisheries.

Following suspicions over inadequate weighing and catch-registration practices in Baltic Sea Member States, the Commission services conducted a verification series from 2021 to 2024 in Baltic Sea Member States, focusing on unsorted pelagic species intended for human consumption and industrial purposes. To date, these verifications (covering all but one Member State) unveiled deficiencies in certain Member States in the region. These deficiencies include: (i) inadequate procedures and systems for weighing catches; (ii) misreporting of species and quantities; (iii) deficiencies in data cross-checking mechanisms; and (iv) weaknesses in inspection and enforcement, including the imposition of sanctions.

These findings, against the background of the derogation from the MoT rule for unsorted pelagic landings, indicate that there has been substantial misreporting of sprat and herring landings. This misreporting might weaken the accuracy and reliability of the assessments of these stocks and contribute to overfishing.

It is worth noting that all issues mentioned above were already raised previously on many occasions, including in the public consultation on the evaluation of the Control Regulation.<sup>19</sup> However, the discussions held in this context also highlighted the need to address these issues at EU level rather than at regional level in order to avoid distorting competition.<sup>20</sup> The Commission proposal for the revision of the fishery control system<sup>21</sup> took this into account.

To address these critical issues, the revised Control Regulation introduces a range of measures to: (i) improve fisheries control and enforcement; and (ii) tighten the rules to make more operators weigh unsorted catches. These measures include: (i) the harmonisation of serious infringements; (ii) the standardisation of sampling and control plans; and (iii) the modification and gradual phasing out of the lenient MoT rule set by the MAP. Some rules will enter into force gradually between now and 2028. However, the basic principles behind catch registration and weighing remain the same in the revised Control Regulation.

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<sup>19</sup> COM(2017) 192 final of 24 April 2017.

<sup>20</sup> SWD(2018) 280 final of 30 May 2018.

<sup>21</sup> COM(2018) 368 final of 30 May 2018.



## **7. Stakeholder consultation**

As they did when preparing the first report, the Commission services undertook a targeted stakeholder consultation when preparing this second report. The targeted stakeholder consultation was based on a questionnaire. The main consulted stakeholders were the BSAC, the Baltic Sea Member States group ('BaltFish'), and their respective members.

This staff working document reproduces the content of the replies as received by the Commission services. Questions 1 to 5 of the questionnaire refer to the identity of the respondent and are therefore not reproduced in this document. After extending the deadline for reply, neither BaltFish nor 5 out of the 8 consulted Member States had replied. The replies of the BSAC are reproduced first. This is followed by the replies of the Member States, which are in turn followed by the replies of the other organisations in alphabetical order.

### **7.1. Baltic Sea Advisory Council**

#### **Section 1 – Progress made towards sustainable fishing levels**

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q8: Free text***

In the BSAC's opinion, the MAP has not contributed to increasing the number of TACs set at MSY and has not helped in dealing with difficult cases such as the eastern and western Baltic

cod stocks, western herring and that the provisions in the MAP have in some cases been counter-productive.

In the BSAC's opinion, the unsuccessful rebuilding of the Baltic cod stocks exemplifies the ineffective framework provided for by the MAP..

## **Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- Significant
- Some
- Not much
- None at all
- Counterproductive

- **No opinion**

***Q13: Free text***

The BSAC is of the opinion that the implementation of the Landing Obligation has not been fully successful. The BSAC is eagerly waiting for a report from EFCA on the implementation of the LO in the Baltic Sea in 2019-2021.

Some BSAC members highlight that the control of discards has not been properly implemented.

The BSAC is of the opinion that the MAP has not contributed to achieving the implementation of the Landing Obligation. For example, it has not provided enough help in terms of the developments of alternative gears or facilitating the removal of gears that do not work. Some of the provisions of the MAP have even been counterproductive in the implementation of the Landing Obligation, for instance the specific measures for flatfish, which have encouraged bad practices in the fishery.

In the opinion of the BSAC, the MAP should be revised in order for it to be more adaptative. There is a need to adapt fishing mortality to spatial distribution/abundance and interactions with other species.

**Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- Significant
- Some
- Not much
- None at all
- **Counterproductive**
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q17: Free text***

The BSAC is of the opinion that the MAP has actually been counterproductive in implementing an ecosystem-based approach to fisheries, whereby environmental factors and interactions are to become a more integral part of managing the fisheries. Moreover, the MAP does not take into consideration the importance of species interactions and age structure of the stock.

This should include the impact of interdependency between fish species and also account for the role of non-fish species predators such as seals and cormorants on the fish stocks, including diseases transmitted by these predators.

Some BSAC members are of the opinion that the MAP has failed to facilitate the implementation of MSFD (descriptor 3).

In the opinion of the BSAC, the MAP should be revised in order for it to be more adaptative to take account of the changing environmental conditions

The BSAC is of the opinion that current reference points (fishing mortality) should be revised to take account of e.g. decreasing trend in stock status, unfavorable changes in age and size distribution, negative impact on the status of other species or disruptions in food web or other environmental conditions that will likely decrease productivity of the stocks. There is a need to adapt fishing mortality to spatial distribution /abundance and interactions with other species.

Setting TAC at MSY should not be per se an objective. The MAP and the technical measures should be revised to take account of the changes in the state of the fish stocks and the environment.

The MAP has no crisis mechanism to deal with unexpected developments of the ecosystem. Under the current unexpected developments of stocks, TAC and quotas and socio-economic impacts are not well dealt with by the existing MAP. For example, on the ecosystem aspect, we clearly see in the Baltic that the predators have to be taken into account if we talk about “ecosystem based management”. Concretely, we need more active management of predators if we want to make full use of the potential value of the Baltic Sea for European food security.

Some BSAC members highlight that the MAP should better adapt the fishing effort to the reproductive capacity of the fish stocks. In particular, the lack of selectivity of trawl fishing gear needs to be addressed in order minimize bycatch.

Other BSAC members highlight that further effort reduction does not have significant impact of the reproductive capacity of the fish stocks. So far, considerable effort reduction has deprived the fishing communities of work and income, without any positive impact on the fish stocks. Therefore, the reasons behind the current state of resources should be sought elsewhere, and may include predators or change in the stock structure as a result of excessive selectivity.

#### **Section 4 – Control enforcement**

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- Some
- Not much
- None at all
- Counterproductive
- **No opinion**

***Q20: Free text***

Some BSAC members point that there have been significant volumes of catch misreported in the mixed sprat /herring fishery. The Margin of Tolerance has provided an incentive to misreport catches. This has resulted in poor quality catch data being submitted to stock assessors and has contributed to the poor status of the central Baltic herring. ICES have highlighted the impact of catch misreporting in these fisheries in the stock assessments and working group report for a number of years.

Some BSAC members point that regarding the problem of compliance with the rules concerning the margin of tolerance (MOT) in the case of fishing vessels retaining unsorted catches, in particular kept on board in refrigerated tanks. Such vessels are adapted to keep fish in the above tanks and transport the catch from the fishing gear to the hold by means of a non-contact pump system. Shipowners have retrofitted their boats with such systems to comply with the so-called 'discard ban'. It is impossible for the skipper on such a vessel to estimate the species composition

with such a high degree of accuracy. With a catch of several tens of tonnes, a 20% MOT for non-target species is unfeasible.

Example: the catch is 20 tonnes in which the skipper estimates that there are about 200kg of non-target species. In port after landing, the result shows that he made a mistake and there is not 200kg of non-target but 300kg. He has exceeded the MOT under the new regulation. He was wrong by several tens of kilograms in a weight of several tens of thousands. Such a restrictive regulation will lead to massive violations and an avalanche of administrative proceedings and penalties, not because not because the skipper or crew is unwilling or wilfully breaks a rule, but because of a rule that is impossible to enforce. The fishing sector questions such unrealistic regulations, impossible for some segments of the fleet to comply with. The representatives of the fishing sector are of the opinion that the creation of such regulations shows incredible incompetence. Some see it as a deliberate act to eliminate the last group operating on the available raw material and supplying it in quality for direct human consumption, as a supplier of raw material to fish processing plants and a link in the food security chain.

Other BSAC members point out that if controls are implemented that lead to more accurate catch data the recently adopted changes to the MOT have a positive impact.

## **Section 5 – Regional cooperation**

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q23: Free text***

The BSAC is of the opinion that the MAP has not facilitated regional cooperation and its functioning is not helped by regional cooperation. The BSAC underlines that the regional

process of the implementation of the MAP will not work unless there are sufficient resources onboard.

Predator management and the impact on natural mortality for certain fish species is an example where the MAP has not triggered improved regional cooperation where one would have hoped. Some BSAC members highlight that there is intensive cooperation between stakeholders in the form of a lively exchange of arguments. Unfortunately, in most cases no common solution is found because the interests regarding the management of fish stocks are too diverse. For example, semi-industrial trawling is geared towards mass catches, while small-scale fishing is geared towards quality.

## **Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q27: free text***



Some BSAC members put forward that the small-scale coastal fleet is more dependent on larger stocks with larger individuals, but the implementation of the MAP fails to deliver this, thereby having a significant socio-economic effect on the industry.

Other BSAC members remind that it is not a specific segment but the entire fisheries that are dependent on large stocks.

The MAP tries to fish all species at their maximum sustainable yield simultaneously on the basis of single stock assessments. This was criticized by the BSAC members at several occasions. Achieving the MSY objective for every single species at the same time, taking into account the species dependency such as between sprat and cod, is impossible and has negative socio-economic impact.

For some BSAC members, the implementation of the MAP therefore necessarily favours fishers catching lower trophic level species.

Some BSAC members highlight that the MAP fails to account for there to be sufficient prey availability for predator species, thereby causing repressed biomass growth amongst certain species that some fleet segments are more dependent on.

Other BSAC members highlight that, taking into consideration the diet scheme e.g in cod diet is 20-40% of clupeide, there is enough of food for the predator species. The problem comes from the size/age structure which results from the management approach, which makes some species like cod unable to hunt effectively. The fact that MAP does not include real age/size structure and species dependency diverges from the assumed goals, so this fact has also big correlation with socio-economic development.

## **Section 7 – Additional measures**

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***

In the opinion of the BSAC fisheries representatives, the MAP should include socio-economic considerations. It should be more of a fisheries management plan and focus on socioeconomic and less on conservation and MSY targets.

The BSAC is of the opinion that the MAP should more specifically address western spring spawning herring. The MAP has not been accepted by Norway, a key coastal state for the management of the stock. Thus, ICES does not provide scientific advice based on the MAP.

In addition, the BSAC has published a reply to the European Commission's open feedback on the proposed changes to the Baltic Multiannual Plan (Article 4.6, ie the 5% rule) in January 2024 .

The BSAC highlight the need for sustainable management of fish stocks through proper approach to selectivity of fishing gears.

Some BSAC members highlight the need improving selectivity in trawl fishing and call for an end to the permanent subsidization of uneconomical fishing operations.

## **Section 8 – Overall assessment**

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- Beneficial
- **Neutral**
- Negative
- Very negative
- No opinion

***Q30: Free text***

The BSAC is of the opinion that there is value in having a Multiannual Plan for the Baltic. However, the MAP has not lived up to its expectations and has not delivered the expected results during 6 years of its implementation.

In the opinion of the BSAC, the MAP should be revised to include specific major changes.

## **7.2. Estonia**

Member of the 'BaltFish' Member States group

### **Section 1 – Progress made towards sustainable fishing levels**

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- Significantly
- **A little**

- Not much
- Not at all
- Counterproductive
- No opinion

***Q8: Free text***

SSBmsy is a problem, at the beginning of the implementation of the Regulation the situation with pelagic stocks was good and it seemed that MAP played its role well, i.e. justified itself. Now situation is changed, all herring stocks with one exception and cod stocks are below SSBmsy level. So, it seems some environmental elements are not considered when MSY approach is applied. It is difficult to give final assessment as also ICES does not have clear picture on the reasons behind herring stocks. However, interspecies relations should be considered more flexibly when TACs are set. It is not applied at all due to lack of relevant ICES recommendation.

**Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive

- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- Significant
- Some
- **Not much**
- None at all
- Counterproductive
- No opinion

***Q13: Free text***

Our fleet targets pelagic stocks, discard of pelagic stocks is marginal and therefore the impact of the discard to pelagic stocks is marginal as well. As regards the groundfish species like cod and flatfish, there is discard issue recognised. However, the impact of the discard to plaice stock is small as the stock is in good shape. As regards the impact of the discard to the cod stocks, as the stock is in very bad condition, therefore every activity which increases mortality (including discard) has negative effect to the cod stocks.

### **Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q17: Free text***

Apparently changes in ecosystem have taken place in the Baltic sea which affects negatively Baltic sea stocks (predators - seals, birds; eutrophication; changes in abiotic indicators; non-indigenous/alien species). MAP objective foresees, article 3 point 3: "The plan shall implement the ecosystem-based approach to fisheries management in order to ensure that negative impacts of fishing activities on the marine ecosystem are minimised". MAP can not do much in terms of ecosystem consideration to fish stocks, but at least interspecies connections should be possible to consider, e.g mixed fisheries of sprat and herring. Sprat is doing better and is more resilient to ecosystem changes (temperature changes etc), adapts better, but stocks compete over the food chain. Big sprat stock dominates over herring stocks and further impacts herring stocks negatively. When TACs are set these considerations should be considered. In the future MAP could foresee also limitation of predators which significantly affects fish stocks (Great cormorant, grey seal etc).

#### **Section 4 – Control enforcement**

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- Significant
- **Some**
- Not much
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- **Some**
- Not much
- None at all

- Counterproductive
- No opinion

***Q20: Free text***

We do not feel that MOT changes have had significant effects on Baltic sea stock, new general rule - 10% MOT to each specie makes life for fishers very difficult. It is doable when in mixed fisheries herring or sprat portion is over 20%, less than that creates problem. When some specie represents less than 10% or 2 % (as the departure point in the amendment of control regulation) the 10% MOT is clearly to restrictive. Therefore the solution (10% MOT from all quantities) for listed ports is important for our sector. So, the measures which will apply in listed ports should be reasonable and doable also when fish is landed/caught for human consumption, e.g water separation is a possible problem- the landings for human consumption always include water (keeping fish quality). Also, landings for human consumption is pretty small (20-30 tons) comparing to industrial landings, fishing trip lasts less than one day, etc, therefore investments for ports in order to use listed port derogation should be reasonable, e.g requirement to independent weigher is unproportional requirement.

**Section 5 – Regional cooperation**

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q23: Free text***

MAP has triggered regional cooperation on Baltic sea TACs and quotas, for some years BALTfish have been successful and agreed on joint proposal on TACs and quotas. Also, MS have moreless same interpretation on different stocks reference points and sustainability levels etc.

## Section 6 – Socio-economic impact

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q27: free text***

Socio economic impact is closely related to the stock situation, e.g directed fishing for cod stocks is banned, therefore the fleet is reoriented to finished its activity, main basin; Bothnian and western herring socks have reduced significantly and clearly there is negative socio economic effect, fleet has reduced accordingly. in the Baltic sea alternative are difficult, at least in Northern part, in southern part North sea could give some alternative, but in the North if TACs are in a very low level, it means that fishing effort and fleet follows the same trend.

## Section 7 – Additional measures

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***



As mentioned above - interspecies influence should be taken into account in mixed fisheries, impact of predators should be considered and further activity agreed upon.

## **Section 8 – Overall assessment**

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- **Beneficial**
- Neutral
- Negative
- Very negative
- No opinion

***Q30: Free text***

It gives basis to set derogations for landing obligation (e.g necessary for salmon fishing). MOT derogation was set in the MAP regulation, it is important tool. Also it gives good basis to set additional remedial measures for the protection of stocks. Etc.

### **7.3. Latvia**

Member of the 'BaltFish' Member States group

## **Section 1 – Progress made towards sustainable fishing levels**

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- Significantly
- A little
- **Not much**
- Not at all

- Counterproductive
- No opinion

***Q8: Free text***

## **Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- Significant
- Some
- **Not much**
- None at all

- Counterproductive
- No opinion

**Q13: Free text**

### **Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

**Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?**

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

**Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?**

- Significant
- Some
- Not much
- None at all
- Counterproductive
- No opinion

**Q16: To what extend can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?**

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

**Q17: Free text**

### **Section 4 – Control enforcement**

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- Significant
- Some
- **Not much**
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- Some
- Not much
- None at all
- Counterproductive
- **No opinion**

***Q20: Free text***

## **Section 5 – Regional cooperation**

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive

- No opinion

***Q23: Free text***

## **Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q27: free text***

## **Section 7 – Additional measures**

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***

## Section 8 – Overall assessment

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- Beneficial
- Neutral
- **Negative**
- Very negative
- No opinion

***Q30: Free text***

### **7.4. Poland**

Member of the 'BaltFish' Member States group

## **Section 1 – Progress made towards sustainable fishing levels**

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q8: Free text***

The MAP is a useful instrument that allows TACs to be set transparently through the rules it sets out. However, it does not provide enough flexibility in some cases..

## **Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- Significant
- Some
- Not much
- None at all
- Counterproductive
- **No opinion**



***Q13: Free text***

The issue of discards is of a horizontal nature, therefore the assessment of the impact of MAP on the implementation of the landing obligation should be made jointly for the entire Baltic Sea by one institution.

**Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- Significant
- **Some**
- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q17: Free text***

## Section 4 – Control enforcement

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q20: Free text***

Recently adopted changes to the MOT will contribute to more accurate reporting of catches in pelagic fisheries.

## Section 5 – Regional cooperation

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- **Significantly**
- A little
- Not much

- Not at all
- Counterproductive
- No opinion

***Q23: Free text***

MAP provided a new stimulus for strengthening regional cooperation within BALTFISH, especially in terms of setting TAC's levels. An example of this good cooperation was the agreement that BALTFISH reached on fishing opportunities in recent two years.

**Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q27: free text***

## Section 7 – Additional measures

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***

As mentioned above - interspecies influence should be taken into account in mixed fisheries, impact of predators should be considered and further activity agreed upon.

## Section 8 – Overall assessment

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- Beneficial
- **Neutral**
- Negative
- Very negative
- No opinion

***Q30: Free text***

MAP is a necessary tool, but at least a discussion on changing it should begin in order to adapt the plan's provisions to the current situation of fish stocks in the Baltic Sea. The adoption of the plan only in 2016 did not allow it to be fully exploited, which would have been possible had it been adopted earlier or if the situation of fish stocks had been better. The discussion on a possible amendment of the MAP should be conducted first of all among fishermen themselves, so that the solutions developed by them could contribute to improving their economic situation, but also could take into account their practical knowledge. Their proposals should be evaluated in order to adopt the best solutions that could improve their situation and could have a positive impact on the fish stocks in the Baltic Sea.

### **7.5. Baltic Waters**

Member of the Baltic Sea Advisory Council, other interest group

## Section 1 – Progress made towards sustainable fishing levels

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- Significantly
- A little
- **Not much**

- Not at all
- Counterproductive
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q8: Free text***

In theory, the MAP could have improved the situation of stocks in the Baltic Sea. The MAP itself provides a somewhat clear framework and goals. Unfortunately, in practice there is a lack of compliance and control of compliance. In our world, stocks would not be in this critical state if the CFP, the MAP and the MSFD had been followed.

## **Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q13: Free text***

Neither herring nor sprat are considered as a by-catch species in the MAP, they are fished in a mixed fisheries and misreporting occur.

### **Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- **Significant**
- Some

- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q17: Free text***

As already stated, the MAP has potential but in real life it lacks compliance and control.

#### **Section 4 – Control enforcement**

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- Significant
- Some
- **Not much**
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- Some
- Not much
- None at all
- Counterproductive
- **No opinion**



***Q20: Free text***

MOT should not be set higher but rather lower. A correct reporting of Baltic Sea fishstocks is highly important for scientific assessments.

**Section 5 – Regional cooperation**

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q23: Free text***

Som tidigare nämnts har MAP potential att bidra till ett bättre samarbete, men hela kvotprocessen måste vara transparent i alla steg (ICES, BALTFISH, EU-Commission, Council of minister to set quotas).

**Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q27: free text***

Contraproduktive, weil - heute, nur ein paar Fischereien profitieren, und diese sind die großskaligen Schleppnetzfischer, die Fischmehl fischen. Küstener Fischer, die für den menschlichen Verzehr (und die Nahrungssicherheit in unserer Region) fischen, profitieren nicht; ihr sozio-ökonomischer Einfluss ist und wird viel schlimmer sein als der der großskaligen Fischer. Aber auch der sozio-ökonomische Einfluss der großskaligen Fischer wird sich verschlechtern, wenn der Fisch ausläuft.

## **Section 7 – Additional measures**

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***

Compliance

## **Section 8 – Overall assessment**

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- **Beneficial**
- Neutral
- Negative
- Very negative
- No opinion

***Q30: Free text***

MAP has potential but today there are shortcomings where some of them is addressed above.

**7.6. Darłowska Grupa Producentów Ryb i Armatorów Łodzi Rybackich**

Member of the Baltic Sea Advisory Council, fisheries sector

**Section 1 – Progress made towards sustainable fishing levels**

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q8: Free text***

Naszym zdaniem założenia MAP nie były wdrażane i respektowane, w związku z czym nie przyniosły oczekiwanych efektów.

**Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- **Significantly**
- A little
- Not much

- Not at all
- Counterproductive
- No opinion

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q13: Free text***

### **Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly

- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q17: Free text***

Zupełny brak wdrażania założeń MAP

#### **Section 4 – Control enforcement**

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- Significant
- Some
- **Not much**
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- Some
- **Not much**
- None at all
- Counterproductive
- No opinion

***Q20: Free text***

## **Section 5 – Regional cooperation**

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q23: Free text***

## **Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly

- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q27: free text***

## **Section 7 – Additional measures**

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***

## **Section 8 – Overall assessment**

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- Beneficial
- Neutral
- Negative
- **Very negative**
- No opinion

*Q30: Free text*

**7.7. Fischereischutzverband Schleswig-Holstein**

Member of the Baltic Sea Advisory Council, fisheries sector

**Section 1 – Progress made towards sustainable fishing levels**

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q8: Free text***

Die Berechnung des MSY beruht auf falschen Zahlen, weil die Beifänge in der Schleppnetzfisherei nicht in die Berechnung eingeflossen sind. Deshalb hat sich, wie man sieht der beabsichtigte Erfolg nicht eingestellt. Der Dorsch und Heringsbestand ist entgegen der Berechnungen teilweise oder ganz zusammengebrochen.

**Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- **Significantly**
- A little



- Not much
- Not at all
- Counterproductive
- No opinion

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q13: Free text***

Es macht für die Bestandserhaltung keinen Sinn Rückwürfe zu managen, weil die Fische tot und deshalb für die Reproduktion in jedem Fall verloren sind. Die Erfahrung zeigt darüber hinaus, dass die Kontrolle der Rückwürfe bisher nicht erfolgreich umgesetzt werden konnte. Die Differenz zwischen gemeldeten Rückwürfen und Seekontrollen stützt diese Feststellung.

### Section 3 – Ecosystem-based approach

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q17: Free text***

Indem der Fangaufwand der Reproduktionsfähigkeit der Fischbestände besser angepasst wird. Hier ist bei der Selektivität der Fanggeräte in der Schleppnetzfischerei anzusetzen um Beifänge besser zu minimieren.

### Section 4 – Control enforcement

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- Significant
- Some
- **Not much**
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- Some
- **Not much**
- None at all
- Counterproductive
- No opinion

***Q20: Free text***

Man sucht die Ursachen für die bisher nicht gelungene Bewirtschaftung der Fischbestände nun entsprechend der Anzahl der Fahrzeuge in der Kleinfischerei mit passiven Fanggeräten. Aufgrund des viel geringeren Fangaufwandes dieser Fahrzeuggruppe und der hohen Selektivität der dort verwendeten Fanggeräte wird auch die neue Kontrollverordnung, wie schon die vorangegangene in ihrer Wirkung weit hinter den in sie gesetzten Erwartungen zurückbleiben.

## **Section 5 – Regional cooperation**

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly
- **A little**
- Not much
- Not at all
- Counterproductive

- No opinion

***Q23: Free text***

Es gibt zwar eine intensive Zusammenarbeit von Interessenträgern in Form von regem Austausch von Argumenten. Leider wird in den meisten Fällen kein gemeinsamer Lösungsansatz gefunden, weil die Interessenlage hinsichtlich der Bewirtschaftung von Fischbeständen zu verschieden sind. So ist z.B. die halbindustrielle Schleppnetzfisherei auf Massenfänge ausgerichtet, die Kleinfischerei eher auf Qualität.

**Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q27: free text***

Das bisher im Wesentlichen verfolgte Prinzip "so viel wie möglich" ist gescheitert, weil es die Reproduktionsfähigkeit der meisten Fischbestände übersteigt. Daraus folgend ist ein wirtschaftlich erfolgreicher Betrieb in der Fischerei zur Zeit nicht mehr möglich.

**Section 7 – Additional measures**

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***

Nachhaltige Bewirtschaftung der Fischbestände durch eine Verbesserung der Selektivität in der Schleppnetzfisherei. Beendigung der Dauersubventionierung von unwirtschaftlichen Betrieben.

**Section 8 – Overall assessment**

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- Beneficial
- **Neutral**
- Negative
- Very negative
- No opinion

***Q30: Free text***

Verbesserungswürdig!

**7.8. Low Impact Fishers of Europe (LIFE)**

Member of the Baltic Sea Advisory Council, fisheries sector

**Section 1 – Progress made towards sustainable fishing levels**

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

***Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?***

- Significantly
- A little

- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q8: Free text***

Since the MAP was implemented, total stock biomass for the majority of stocks in the Baltic has declined. It is not possible to fish all stocks at the Fmsy point value simultaneously and have the resulting SSB for all stocks above Bmsy. Clear problem is that single species Fmsy values are derived from MSYBtrigger. The fact that MSYBtrigger = Bpa is a huge problem because we are using depressed biomass levels as the basis for sustainable fishing mortality.

Only one stock, Gulf of Riga herring, has biomass levels equal to Bmsy = 2Bpa. It is no surprise that this is also the only stock which the fishing industry has been able to exploit with high and stable quotas.

Biomass for all other Baltic stocks are too low. In addition, the lack of old and large fish, key components of successful MSY management, represent a key indicator of the counterproductive nature of the MAP implementation.

## **Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q13: Free text***

There are two separate issues. Firstly, illegal and unreported discards (demersal trawl segment). Secondly, misreported and unreported catches (pelagic trawl segment).

These problems have persisted throughout the implementation of the MAP. They have not been successfully mitigated against.

According to the scientific data, cod catches are negligible. While minor, in certain trawl flatfish fisheries unaccounted for discards represent a significant portion of catches.

Of far more significance is the unaccounted for and misreported catches of sprat and herring. Huge volumes of catches are not accurately reported and have increased the uncertainty of scientific recommendations.

### Section 3 – Ecosystem-based approach

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- Significant
- **Some**
- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q17: Free text***

As long as the MAP allows for sprat and herring catches to be fished at MSY so that in the long-run their biomass levels are depleted to MSYBtrigger levels the situation will remain critical for small-scale coastal fishers. The MAP needs to contribute to significant stock biomass growth. Without that first step, we will not have an ecosystem that supports fishermen.

### Section 4 – Control enforcement

On control and enforcement, in your opinion:



***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- Significant
- Some
- Not much
- None at all
- **Counterproductive**
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- Some
- Not much
- None at all
- **Counterproductive**
- No opinion

***Q20: Free text***

That the Baltic received a 20% exemption level, double for the rest of the EU, is another example of the counterproductive nature of the legislation. There have been significant problems with the implementation of the Control Regulation throughout the Baltic region. In particular, the pelagic trawl fleet segment.

## **Section 5 – Regional cooperation**

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly
- A little
- Not much
- **Not at all**

- Counterproductive
- No opinion

***Q23: Free text***

## **Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- **Significantly**
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- Significantly
- A little
- Not much
- Not at all
- **Counterproductive**
- No opinion

***Q27: free text***

As outlined above, the MAP has contributed to significant stock decline in the biomass levels for Baltic fish stocks. This is the basis for the core socioeconomic problem that small-scale coastal fishers face.

## Section 7 – Additional measures

*Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?*

## Section 8 – Overall assessment

*Q29: What is your overall assessment of the Baltic MAP?*

- Very beneficial
- Beneficial
- Neutral
- Negative
- **Very negative**
- No opinion

*Q30: Free text*

### 7.9. Swedish Pelagic Federation PO

Member of the Baltic Sea Advisory Council, fisheries sector

## Section 1 – Progress made towards sustainable fishing levels

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

*Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?*

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

*Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?*

- Significantly
- A little
- **Not much**

- Not at all
- Counterproductive
- No opinion

***Q8: Free text***

## **Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- Significant
- Some
- **Not much**

- None at all
- Counterproductive
- No opinion

***Q13: Free text***

### **Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extent can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q17: Free text***

## Section 4 – Control enforcement

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- Some
- Not much
- **None at all**
- Counterproductive
- No opinion

***Q20: Free text***

18. The MOT is related to how well the skipper can estimate the catch on board, and has no real control value as we see it. It also has no impact on stock status.

## Section 5 – Regional cooperation

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly

- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

*Q23: Free text*

## **Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

*Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?*

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

*Q25: Are there differences between different (sub-)sectors?*

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

*Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?*

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

*Q27: free text*

## Section 7 – Additional measures

*Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?*

## Section 8 – Overall assessment

*Q29: What is your overall assessment of the Baltic MAP?*

- Very beneficial
- Beneficial
- Neutral
- **Negative**
- Very negative
- No opinion

*Q30: Free text*

### 7.10. WWF – World Wide Fund For Nature, The Baltic Sea Programme

Member of the Baltic Sea Advisory Council, other interest group

## Section 1 – Progress made towards sustainable fishing levels

According to the MAP, MSY had to be achieved for all relevant stocks by 2020 and maintained thereafter. In your opinion:

*Q6: To what extent has the MAP contributed to increase the number of TACs set at MSY and to keep them at MSY thereafter?*

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

*Q7: Has the MAP provided an effective framework to contribute to rebuilding fish stocks in the Baltic Sea above healthy levels?*

- Significantly
- A little
- **Not much**



- **Not at all**
- Counterproductive
- No opinion

***Q8: Free text***

Currently we don't see positive development in the fish stocks and therefore we see that the MAP hasn't contributed to rebuilding fish stocks. The only positive example is the increase of Gulf of Riga herring spawning stock biomass (out of 10 Baltic fish stocks managed by TACs), but we see that the positive development is largely due to local and national management measures.

Regarding fishing mortality, Baltic Sea MAP described mortality reference points as ranges which extended beyond the limits in Article 2 of the CFP (i.e. introducing fishing mortality ranges which exceed the FMSY point estimate). Thus some of the agreed Baltic TACs were set above F-MSY point value risking overfishing of the targeted stock.

**Section 2 – Discards and landing obligation**

On discards and the landing obligation, in your opinion:

***Q9: To what extent do undocumented and illegal discards continue?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q10: To what extent has the MAP contributed to avoiding discards and implementing the landing obligation?***

- Significantly
- A little
- Not much
- **Not at all**
- Counterproductive
- No opinion

***Q11: To what extent does the MAP allow taking into account the management of mixed fisheries – management of by-catch stocks and avoidance of choking situations?***

- Significantly
- A little
- Not much
- Not at all

- **Counterproductive**
- No opinion

***Q12: What is the impact on the fish stocks of the current level of discards and implementation of the landing obligation?***

- Significant
- Some
- Not much
- None at all
- Counterproductive
- **No opinion**

***Q13: Free text***

It is currently difficult to assess the implementation – and therefore effectiveness – of the landing obligation due to a lack of reliable catch data and use of monitoring, control and surveillance tools. The new Fisheries Control Regulation, which entered into force on the 1<sup>st</sup> of January, will mandate the use of Remote Electronic Monitoring to ensure compliance with the landing obligation for vessels above 18m. This obligation must be put into place as soon as possible (and by no later than 2027, as per the legal requirement) and to expand this requirement to vessels below 18m at risk of non-compliance with the landing obligation.

Baltic Sea MAP allowed the use of upper ranges as a means to address challenges in the management of mixed fisheries, but then contradicted that allowance by basing provisions on single species stock management. In case of mixed fisheries and high bycatch rates we highlight that fishing mortality for the stronger stock should be set in such a way to avoid overfishing of weaker stocks.

Baltic MAP omits measures to avoid bycatch (such as developing more selective fishing gear, or other mitigating measures such as avoidance measures or spatio-temporal closures), but instead includes delegated powers for these to be developed separately.

### **Section 3 – Ecosystem-based approach**

On the ecosystem-based approach to fisheries management and against the background that ‘good environmental status’ was not achieved by 2020, in your opinion:

***Q14: To what extent has the MAP contributed to implement the ecosystem-based approach to Baltic Sea fisheries management?***

- Significantly
- A little
- **Not much**
- Not at all
- Counterproductive
- No opinion

***Q15: What is the impact on the relevant stocks of the current situation of the ecosystem (cf. ICES ecosystem overview <https://doi.org/10.17895/ices.advice.21725438>)?***

- **Significant**
- Some
- Not much
- None at all
- Counterproductive
- No opinion

***Q16: To what extend can the MAP contribute to addressing the current issues of the Baltic Sea ecosystem?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q17: Free text***

The Baltic MAP has some potential in bringing in ecosystem considerations as among others it refers to achieving the good environmental status under MSFD, however we observe lack of implementation of these provisions. The Baltic Sea ecosystem is changing rapidly with unexpected and sudden impacts on fish stocks and therefore the ecosystem perspective (such as changes in the food web) should be taken into account with high priority in fisheries management.

We acknowledge some steps in a direction on ecosystem-based fisheries management implementation in the Baltic Sea region, such as EU Fisheries Council (AGRIFISH) decision on plaice TAC (for the year 2023, 2024) being set below maximum threshold advised by the scientists, in order to protect depleted Baltic cod stocks from by-catch.

Baltic Sea MAP omits measures to address specific environmental and wider fisheries challenges in the Baltic (e.g. the incidental catches of sensitive species such as seabirds, harbour porpoises and other marine mammals, or the protection of essential fish habitats). Article 3.3. and 8.1 of the MAP provides opportunity to steer fisheries towards low impact gear/fishing practices, but we consider that it was never properly considered/applied.

Baltic Sea MAP focused primarily on fishing mortality and biomass reference points, as opposed to a broader ecosystem approach.

## Section 4 – Control enforcement

On control and enforcement, in your opinion:

***Q18: What have been the effects of Article 13 (MOT) on the relevant Baltic Sea fisheries and on the status of the related stocks?***

- Significant
- Some
- Not much
- None at all
- **Counterproductive**
- No opinion

***Q19: What effects on the relevant stocks do you expect from the recently adopted changes to the MOT?***

- Significant
- **Some**
- Not much
- None at all
- Counterproductive
- No opinion

***Q20: Free text***

Baltic pelagic fisheries have had a more lenient MoT and this has led to a large decline in the accuracy of catch reporting. An audit by the Commission found underreporting of sprat by 78% in one country combined with an overreporting of over 800% of bycatch species not subject to quota. In another instance they found an average underreporting of herring of 36% and of 63% in the case of sprat. The increase of MOT, combined with mis- and unreporting of catches, means that the catch data used by ICES would become considerably less reliable, leading to a less reliable stock assessments and possible errors when defining sustainable fishing mortality levels. We see that the possible inaccuracy of stock assessments and misreporting of sprat as herring have very likely influenced overfishing via underreporting catches and have hindered the outcomes of the Baltic MAP.

## Section 5 – Regional cooperation

On regional cooperation, in your opinion:

***Q21: To what extent has the MAP strengthened regional cooperation, including with stakeholders, on the preparation of joint recommendations?***

- Significantly
- A little
- Not much

- Not at all
- Counterproductive
- **No opinion**

***Q22: Has the MAP triggered strengthened regional cooperation on other topic?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q23: Free text***

We consider that these questions are more relevant to the Baltic Member state representatives. For us as a stakeholder it is difficult to assess the impact because we are not involved in the Baltfish high level group.

## **Section 6 – Socio-economic impact**

Regarding the socio-economic impact of the MAP, in your opinion:

***Q24: How has the overall socio-economic situation of the Baltic Sea fisheries sector developed since the last report on the implementation of the MAP?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- No opinion

***Q25: Are there differences between different (sub-)sectors?***

- Significantly
- A little
- Not much
- Not at all
- Counterproductive
- **No opinion**

***Q26: Do you see a correlation between the implementation of the MAP and the socio-economic developments?***

- **Significantly**
- A little

- Not much
- Not at all
- Counterproductive
- No opinion

***Q27: free text***

The lack of implementation of crucial elements of the Baltic MAP, such as Ecosystem Based Fisheries Management and the art. 2.2 of the CFP has most probably contributed to the current dire situation of socio-economic development. Abundant fish stocks would provide positive socio-economic development for the fisheries sector, which is currently not the case.

**Section 7 – Additional measures**

***Q28: Are there any additional measures that would contribute to the faster achievement of the objectives provided for in Article 3 of the MAP?***

The current Baltic MAP contains no provisions on harvest control rules which should be used to safeguard the stock if its biomass is below critical reference points. Article 5.1 only stipulates “to take into account the decrease in biomass”. Article 5.2 allows suspending the targeted fishery if a stock falls below Blim levels (limit reference point for spawning stock biomass (SBB)), but does not require any concrete action within a specific timeframe.

The MAP also omits measures to avoid bycatch (such as developing more selective fishing gear, or other mitigating measures such as avoidance measures or spatio-temporal closures), but instead includes delegated powers for these to be developed separately.

Furthermore, the MAP doesn’t address specific environmental and wider fisheries challenges in the Baltic (e. g. the incidental catches of sensitive species such as seabirds, harbour porpoises and other marine mammals, or the protection of essential fish habitats).

**Section 8 – Overall assessment**

***Q29: What is your overall assessment of the Baltic MAP?***

- Very beneficial
- Beneficial
- Neutral
- **Negative**
- Very negative
- No opinion

***Q30: Free text***

The Baltic MAP has streamlined the process of setting fishing opportunities but on the other hand it seems to simplify the overall concept of fisheries management, leading to a tendency to

ignore wider ecosystem considerations (e.g. food web interactions and changes in fish stocks productivity). Implementation of Ecosystem Based Approach to fisheries management is almost completely lacking.

## ANNEX

	2020							2021							2022						
	ICES advice		COM proposal	initial TAC	adapted TAC	Landings	TAC at MSY	ICES advice		COM proposal	initial TAC	adapted TAC	Landings	TAC at MSY	ICES advice		COM proposal	initial TAC	adapted TAC	Landings	TAC at MSY
	Fmsy point	Fmsy upper						Fmsy point	Fmsy upper						Fmsy point	Fmsy upper					
Gulf of Bothnia herring (HER/30/31) <sup>1,8</sup>	65.018		65.108	65.108	75.001	72.958	na	65.018		65.018	65.018	119.528	71.700	Yes	111.345	111.714	111.345	111.345	123.298	77.281	Yes
Western herring (HER/3BC+24) <sup>2,8</sup>	0		2.651	3.150	4.116	3.878	No	0		1.575	1.575	1.797	1.540	No	0		788	788	788	569	No
Central herring (HER/3D-R30) <sup>3,4,8</sup>	153.384	190.107	153.384	153.384	167.782	151.111	Yes	97.551	na	97.551	97.551	112.057	104.922	Yes	62.353	na	44.709	53.653	60.538	55.237	Yes
Gulf of Riga herring (HER/03D.RG) <sup>4</sup>	34.445	39.157	34.445	34.445	34.958	33.192	Yes	39.446	45.098	39.446	39.446	40.912	37.961	Yes	47.697	54.884	47.697	47.697	50.648	42.968	Yes
Eastern Baltic cod (COD/3DX32.) <sup>5,8</sup>	0		2.000	2.000	2.000	561	na	0		595	595	595	176	na	0		595	595	595	202	na
Western Baltic cod (COD/3BC+24) <sup>2,6,8</sup>	5.105	na	3.065	3.806	4.740	3.295	Yes	4.635	na	3.395	4.000	4.474	1.326	Yes	698	na	324	489	489	136	Yes
Plaice (PLE/3BCD-C) <sup>7,8</sup>	6.894		6.894	6.894	7.978	4.226	Yes	7.754	10.791	6.894	7.240	8.038	2.731	Yes	11.083	16.006	7.240	9.050	9.854	1.803	Yes
Sprat (SPR/3BCD-C) <sup>3,8</sup>	203.027	210.147	203.027	210.147	223.825	214.492	Yes	222.958	284.896	210.147	222.958	232.291	227.093	Yes	262.337	335.590	222.958	251.943	257.141	249.159	Yes
<b>Total</b>	<b>467.873</b>		<b>470.574</b>	<b>478.934</b>	<b>520.400</b>	<b>483.713</b>		<b>437.362</b>		<b>424.621</b>	<b>438.383</b>	<b>519.692</b>	<b>447.449</b>		<b>495.513</b>		<b>435.656</b>	<b>475.560</b>	<b>503.351</b>	<b>427.355</b>	

	2023							2024					2025	
	ICES advice		COM proposal	initial TAC	adapted TAC	Landings	TAC at MSY	ICES advice		COM proposal	initial TAC	TAC at MSY	ICES advice	
	Fmsy point	Fmsy upper						Fmsy point	Fmsy upper				Fmsy point	Fmsy upper
Gulf of Bothnia herring (HER/30/31) <sup>1,8</sup>	102.719	103.059	80.047	80.047	92.377	66.936	Yes	63.049	na	1.000	55.000	Yes	<i>advice postponed</i>	
Western herring (HER/3BC+24) <sup>2,8</sup>	0		788	788	788	555	No	0		394	788	No	0	
Central herring (HER/3D-R30) <sup>3,4,8</sup>	84.140	na	61.051	70.822	75.348	70.353	Yes	45.500	na	28.550	40.368	Yes	111.034	na
Gulf of Riga herring (HER/03D.RG) <sup>4</sup>	45.643	52.496	45.643	45.643	50.708	47.962	Yes	37.959	43.427	36.514	37.959	Yes	41.635	47.637
Eastern Baltic cod (COD/3DX32.) <sup>5,8</sup>	0		595	595	595	188	na	0		595	595	na	0	
Western Baltic cod (COD/3BC+24) <sup>2,6,8</sup>	943	na	489	489	489	88	Yes	24	na	136	340	na	24	na
Plaice (PLE/3BCD-C) <sup>7,8</sup>	13.315	19.140	11.313	11.313	12.298	1.758	Yes	17.939	26.916	11.313	11.313	Yes	20.149	29.837
Sprat (SPR/3BCD-C) <sup>3,8</sup>	224.114	285.860	201.554	224.114	232.096	219.780	Yes	217.250	222.735	171.815	201.000	Yes	148.320	152.083
<b>Total</b>	<b>470.874</b>		<b>401.480</b>	<b>433.811</b>	<b>464.699</b>	<b>407.620</b>		<b>381.721</b>		<b>250.317</b>	<b>347.363</b>		<b>321.162</b>	

<sup>1</sup> In May 2021 the ICES advice was upgraded to category 1 (MSY) advice and increased from 65.018 tonnes to 117.458 tonnes; the initial TAC was subsequently adjusted accordingly.

<sup>2</sup> The TAC proposal for 2022 was made after the adoption of the formal Commission proposal.

<sup>3</sup> The figures indicated as ICES advice are reduced by the historic Russian share (9.5% for central herring and 10.08% for sprat; the 5% for cod are no longer applied given the 0-catch advice).

<sup>4</sup> The figure indicated as ICES advice takes account of the mixing between central herring and Gulf of Riga herring; for its 2024 proposal the Commission considered the FMSY point value to be 35.000 tonnes (the central Baltic herring migrating into the Gulf of Riga was not added since the Commission proposed to close the targeted fishery for central Baltic herring).

<sup>5</sup> The TAC proposal for 2020 was made after the adoption of the formal Commission proposal.

<sup>6</sup> The figure indicated as ICES advice relates only to commercial catches for 2020 and 2021; since 2022 the figure relates to total commercial and recreational catches.



<sup>7</sup> The figure indicated as ICES advice is a combination of the ICES advice for subdivisions 24-32 and a certain share for subdivisions 21-23 indicated in the ICES advice. ICES has provided category 1 (MSY) advice for 21-23 since 2020, and category 2 (MSY) advice for 24-32 since 2022.

<sup>8</sup> The TAC proposal for 2024 was made after the adoption of the formal Commission proposal.