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SPF comments on the draft proposal from Sweden on the scientific project on spatial fisheries management in the Central Baltic Sea

Sweden (the Swedish Agency for Marine and Water Management, SWAM) has proposed a time-limited scientific project corresponding to spatial fisheries management of pelagic fishing vessels in the Central Baltic Sea.

Herring is one of the key species in the Baltic, both from an ecosystem perspective and from an economical fisheries perspective. The herring stock has historically fluctuated both up and down and is affected by several abiotic, biotic and anthropogenic factors.

SPF welcomes knowledge gathering on the important commercial stocks including Central Baltic herring to better understand them and the challenges they meet. However, this knowledge gathering does not necessarily have to include massive area closures for the fisheries with severe economic consequences for many of the small- and medium sized Swedish vessels fishing on the coastal and regional quotas. Many fishing vessels will disappear as a result of this “project” as they will not be allowed to fish.

SPF is therefore highly critical against the project and have the following comments on the proposal:

Project background and aim

The aim of the study remains unclear and seems more political than biological.

The background for this project arose in a time of decline of the Central Baltic herring stock at the same time as there was a larger industrial trial with consumption fishery in

Västervik (see more below). Due to this, there was medial critique against the large-scale vessels and “industrial trawling” close to the coast resulting in political initiatives such as this project. Therefore, the project also includes odd political values such as how the fish is used after landing through derogations for smaller vessels fishing for consumption.

The latest ICES advice shows that the recent years’ management measures have contributed to a considerably better situation for the stock according to the latest ICES advice and rendering the project mostly unnecessary. One of the conclusions of the background material for the proposal is that the most reliable measure to increase the biomass of herring is to reduce the fishery-induced mortality. This has now been done in the Central Baltic for several consecutive years. The background report from SLU also concludes that any effects of spatial closures is difficult to predict, since detailed knowledge of herring stock structure and migration patterns is lacking. Regardless of this conclusion, these remain objectives for the proposed project to evaluate.

The background data on fisheries in the project description is limited to the years 2012-2021. Recent (2020-2024) management measures such as several large reductions of the TAC for Central Baltic herring have led to distinctly different fishing patterns for the Swedish pelagic fleet, with the large vessels targeting sprat outside 12 Nautical Miles (NM) to a much greater extent than previously. This significant shift and its implications for the fishing pressure on herring along the Swedish coast is not considered in the background description or the considerations of this project, which is a considerable weakness in the proposal. Furthermore, the analysis and understanding of the fishing patterns and uses for the fish landed by the Swedish pelagic fleet is severely lacking in the background description for the project.

A changing fishery – factors that are missing in the project background:

In a few years between 2017-2020, the now closed fish industry in Västervik on the Swedish east coast did a trial with filleting herring for consumption. The factory was otherwise specialising in block freezing fish mainly for animal feed. During these years, a number of large Swedish vessels were fishing herring relatively close to the coast to this factory. During the same years, herring quotas were decreasing, and the fish size was, due to natural causes, smaller than what the filleting machines could handle. In 2020 the factory in Västervik was closed, and this fishery stopped. However, the media debate in Sweden about large vessels fishing close to the coast had by then taken hold even if this

fishery did not exist after 2020. With the decrease in quota over 2020-2024 the fishery pattern for the larger vessels changed completely to targeting almost solely sprat.

Description of the Swedish pelagic fishery and the consequences of the proposed project

The project proposal contains a very brief and inadequate description of the consequences for the fishery from the proposed measures. SWAM concludes that the economic consequences for parts of the fleet from the project may be significant, but do not address this any further. SPF is highly critical of this and think that a thorough impact assessment for the fisheries must be conducted in advance of the project.

Since the description of the fishery in the project proposal seems to be lacking understanding of the fleet structure and the conditions for the Swedish pelagic vessels as well as an impact analysis on how they, and vessels from other Member States, will be affected by the proposed project, we would like to provide this here.

- The processing industry and market situation

The market for fresh non-filleted herring is virtually non-existent. Therefore, herring needs to be processed (at least filleted) to be marketable. For any fisherman fishing volumes larger than a few dozen kilos of herring, this needs to be done by machine.

The Swedish processing industry in the Central Baltic region consists of two factories – one slightly larger in Simrishamn and one smaller in Nordersund. Along the entire rest of the Swedish east coast there are no other processing industries for pelagic fish (apart from small amounts of the “surströmming” – fermented herring - processors in the ICES area 30).

These two factories have a limited capacity for landing and reception of pelagic fish and the number and size of vessels that can land here is therefore also limited. In the larger factory, 1-2 larger (ca 35 meters) and 1 mid-sized (ca 19 meters) regional vessels are landing fish. In the smaller factory, 4 coastal vessels (<12 meters) and sometimes 1 mid-sized (23 meters) regional vessel have been landing. This is more or less the maximum capacity of these factories with the weak market situation in Sweden for pelagic fish from the Baltic (risk of dioxins, red light on WWF fish list and other factors that affect

customer choices). Sprat from the Baltic is not traditionally eaten in Sweden at all, only small amounts of frozen sprat for consumption is exported abroad.

- **The coastal vessels (<12 meters)**

The coastal fleet fishing for herring in the Sweden area 24-25 and 27 is made up of 10-15 small (less than 12 meters) trawlers and a number of very small-scale fishers with set nets. The set net fishery is declining due to problems with predation and gear damage from seals and cormorants, and the number of small trawlers in the Central Baltic areas of Sweden have increased in recent years since the trawl is the only really seal-safe gear.

Only very few of the coastal trawling vessels (4 vessels) fish mostly for consumption. Most of the Swedish vessels below 12 meters fish 90-100% for fishmeal/fish oil. The fish from these vessels is normally landed into containers that are then transported to fishmeal/-oil industries in Denmark. These vessels do not have access to any sorting equipment or fish processing industries that can receive their landings. Therefore, they cannot easily change to fishing for consumption. For security reasons, these vessels cannot fish outside 12 NM. In the proposed project, most of the coastal fleet along the Swedish east coast would therefore not be allowed to fish and would therefore likely have to quit their fishing businesses altogether. Even one year of “scientific trial” would mean one year of no income for these small fisheries companies, and they do not have the economical margins to withstand that.

- **The regional vessels (12-35 meters)**

The Swedish vessels that fish and land fish only in the Baltic are called regional vessels. These today consist of ca 10 vessels between 15 and 35 meters long. These vessels cannot fish or land outside the Baltic, and part of their quota is non-transferrable. The regional vessels to a large extent use traditional fishing grounds used for generations, and the most important fishing ground for this segment is in the area between 4 and 12 NM.

The majority of the regional vessels fish 100% for fishmeal/fish oil. Only the two largest (both well over 24 meters) are targeting fish for consumption as a majority of their fishery. The rest of the regional vessels, which are all below 24 meters, predominantly fish for fishmeal/fish oil and only a very small part of their landings is sorted and used for consumption. Most vessels do not have access to any sorting equipment or fish processing industries that can receive their landings.

For the larger vessels fishing mostly for consumption, still part of the quota is landed for fish meal and fish oil, and this is an important part of the fishing companies' economy. This part of the quota may still be fished outside 12 NM during the project, but at greater

costs (e.g. greater fishing time and fuel consumption due to longer steaming distances) and less profit for the vessel than fishing the same amount of fish closer to land.

- **The larger vessels (>35 meters)**

The larger Swedish vessels fishing in the Baltic are fully in the ITQ system and may have quotas both in the Bothnian Bay, the Baltic Proper, Skagerrak/Kattegat and the North Sea. In the Central Baltic, these vessels mainly fish sprat for fishmeal/fish oil. They have a good flexibility as to where they can fish their quotas and will be the least affected by all Swedish vessels by the proposed project areas. Most probably, this part of the fleet will greatly gain from the project given the possibility to buy fishing-rights from regional vessels leaving the fleet.

Project design

There seems to be no scientific hypotheses in the project. The main text refers to the Appendix II for the hypotheses, but these are not clearly stated in the Appendix.

The project design is very unclear and is lacking both a before-after or a control area-study area design. The project areas are also very large. Therefore, it remains uncertain how any results of the “scientific project” will be evaluated and against what. There are no designated control/reference areas with continued fishing for comparison. Natural changes in the population, geographical distribution, natural mortality, age- and size-distribution as well as effects of other management measures such as TAC-setting and fishing in other areas will affect the stock. It is not described in the proposal how such changes will be controlled for in the project.

Several of the work packages in the proposed project are possible to perform even without the area closures to increase the knowledge of the herring and the ecosystem it depends on.

Monitoring and evaluation

The monitoring and evaluation programme is not clearly described. There is also no definition of e.g. “healthy population structure” and therefore impossible to evaluate if such has been achieved in the project. It is very important that these aspects are clearly defined and well thought through for a project of this scale.

The relocation of fishing efforts is an unintended consequence of area closures. If areas are closed, a thorough examination of the impacts on surrounding areas is imperative to evaluate the effect of the relocated fishery. The same amount of fish will likely be caught (depending in TAC variations), but in other areas and likely by other vessels (see more below on consequences for the fishery).

Legal basis

The scientific project is proposed to be implemented as national measures in accordance with Article 19 and 20 of the Basic Regulation (1380/2013).

According to Article 20(1), "a Member State may take non-discriminatory measures for the conservation and management of fish stocks and the maintenance or improvement of the conservation status of marine ecosystems within 12 nautical miles of its baselines provided that the Union has not adopted measures addressing conservation and management specifically for that area or specifically addressing the problem identified by the Member State concerned" (our underline).

For Central Baltic herring, both the yearly EU TAC Regulation and the Multiannual Plan in the Baltic Sea are in place. Moreover, additional closure periods to protect spawning herring in ICES areas 24, 25 and 27 were adopted in 2024. Therefore, there are internationally adopted measures in place addressing the conservation and management for the Central Baltic herring, rendering the use of article 20 non-applicable for the project.

As far as we know, Article 20 has not been used for national measures before. Therefore, the above-mentioned questions are very important project hearing in mind that this project may set an unwanted precedent for future uses of Article 20 in the CFP.

If you have any questions related to our response or our pelagic fishery in general, please contact us!

Best regards,

Anton Paulrud,
Swedish Pelagic Federation PO