

Brussels, 30 September 2016

EAA and EFTTA position on Western Baltic Cod catch opportunities 2017

Introduction

Concerning the Commission's recent circulated "non-paper"¹, we have taken note that the Commission "remains open to consider legally binding limitations of recreational fishing as an element of a balanced, overall approach that is inspired by a sense of solidarity."

Indeed, the angling community is willing to show some solidarity though we don't feel anglers have much to be blamed for concerning the poor state of the Western Baltic cod stock.

Our wish is to develop the sea angling sector, bring more people into the activity and thereby bring more economy and jobs to the dependent businesses and local communities, as it happens with regard to freshwater angling. But to do so the fish stocks have to be healthy and well managed. Unfortunately, time and again our wishes and plans are hampered by sea fisheries crisis management of this or that stock calling for our solidarity. As for 'balance', it would be easier to show (more) solidarity if our sector received financial support as other sectors often receive when drastic measures are imposed upon them. In any case, we request that whatever catch reduction measures may be imposed our sector that they are tailor-made to do the least activity and socio-economic damage to our sector. This requires a different approach and thinking than what is usual for commercial fisheries management.

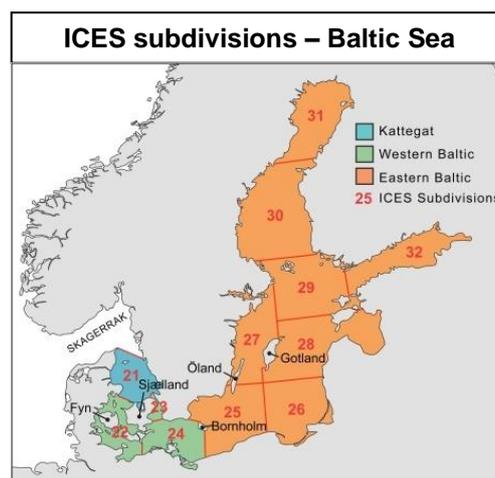
Below we outline some proposals for SD 22, SD 23 and SD 24. We take note that the Commission "remains open to consider a possible split of the TAC for sub-divisions 22-24 into two TACs, one for sub-divisions 22-23 and one for sub-division 24." However, we suggest each SD to be managed in its own right, at least with regard to recreational angling, to make it possible to minimise the negative impact on our sector.

ICES advice of June – SD 22-24

"ICES advises that when the MSY approach is applied, total commercial catches in 2017 for the western Baltic cod stock should be no more than 917 tonnes."²

The ICES advice does not concern recreational fishing. The recreational (German) catches are estimated 2558 t (average of the estimates for 2013–2015). Only German recreational catches are included this assessment. It means that if/when other recreational catches (Denmark, Sweden and Poland) are included the assessment, the calculated spawning biomass will expand, too. And consequently it can be said that the stock overall is more robust than what the present figures indicate. It also means that it is uncertain how much of a help to the stock it is to cut in these recreational catches, which are not included the assessment today. Surely, the cuts will be no help at all to the stock if they are just used to justify an increase in or less reduction of commercial fisheries catches.

Our fear is that more catch reductions (commercial and recreational) than what is good and needed are adopted for the healthy subpopulation in Öresund, and less reduction than what is needed is sought in other areas. Furthermore, as a matter of principle we are not happy to deliver catch cuts without knowing what our



¹ <http://data.consilium.europa.eu/doc/document/ST-12227-2016-INIT/en/pdf>

² <http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2016/2016/cod-2224.pdf>

total catch is. If the baseline was year 1999 (total catch ex. recreational: 42155 t)³, and the recreational catches was at the same scale as today (2558 t) then the recreational fishing mortality of the total would be ca. 5.7% in 1999. Today, (2015) it is 26%⁴. Recreational catches have 'increased' to a level deemed "a significant part of the fishing mortality" only because other sectors catch less today than what they used to. The same pattern and logic we have seen behind the sea bass management measures put in place. We are not too happy about that, and would like catch history to be given importance before and when 'solidarity' and 'balance' are substantiated.

Proposals for recreational fisheries measures in SD 22, 23, 24

ALL AREAS:

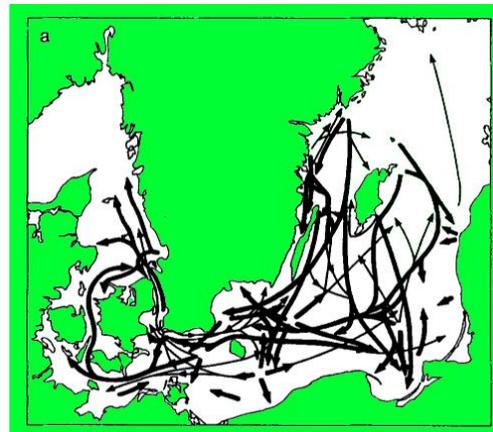
1. – We propose research to be intensified. We find it very unfortunate that the legislators now seems set to introduce various kinds of management measures for recreational fisheries without having the basic knowledge to do so properly. Only German recreational fisheries catches are included the basic stock assessment, and no socio-economic assessment of the impact from measures on tourism, charter boats, tackle sales and other businesses have been conducted. We would like to see not only German but all recreational catches included the assessment (and specified on angling vs. other recreational catching gear). Then, for one thing, the assessed volume of the spawning biomass would come closer to the reality. The members of the European Anglers Alliance wish to participate and co-operate in the data collection. We consider it essential that future cooperation between scientific institutes and fishers and their associations is implemented with the aim of providing data of high quality. This way we can generate trust between fisheries managers and anglers. Good and plenty data is needed for fisheries management but also for tackle trade, tourism and other businesses making a living on anglers/angling, fully or partly, to be able to plan, develop and prosper sustainably.

2. – We propose, for a three year period, that the minimum conservation reference size is increased to 45 cm for recreational fishers (in the hope that the commercial sector would follow suit), which will deliver a catch reduction of small cod / provide more spawning cod. The measure would allow more cod to spawn, and most of the females to be able to spawn twice, before being caught. Also, bigger female cod have much bigger roe/more eggs. The measure would lead to an increase in anglers' releases. However, cod caught on hook has a high survival rate when released (+/- 90%).

PS. The Danish minimum landing size for Western Baltic cod was previously 38 cm, today 35 cm.

ICES (2011)⁵

Spawning area: Deepest parts of the Danish Belt Sea, deepest parts of the Kiel Bight, of the Fehmarn Belt and of the Mecklenburg Bight (deeper than 20 m) and, but with lower importance, the deepest parts of the Arkona Sea (deeper than 40 m)



Migration routes of Baltic cod, according to tagging experiments. Thin lines indicate single or a few records. The main cod distribution and fishing area is the Baltic proper, south of the Åland Sea.⁶

SD 22: This area is fished by anglers from Denmark and Germany mainly.

Germany proposes (Denmark doesn't agree this measure for Danish anglers in this area):

- A spawning area closure for anglers from **1st February to 15th March** in areas with water depths of **more than 20 m**. (in this area cod spawn at depths >20 m for a period of about two months, mainly in February and March).
- A bag limit is not needed. It would do untold damage to the recreational angling sector and its dependant businesses - charter boating and tourism in particular.

³ <http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2016/2016/cod-2224.pdf> ; page 10

⁴ www.ices.dk/sites/pub/Publication%20Reports/Advice/2016/2016/cod-2224.pdf ; page 3

⁵ www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2011/WGBFAS/WGBFAS%20Report%202011.pdf ; page 531

⁶ <http://eurekamag.com/pdf.php?pdf=004980573> ; page 3

• **Note: Only German recreational catches are included the stock assessment. If/when the Danish recreational catches are included the estimated biomass will increase due to that.**

SD 23: Öresund - This area is fished by anglers from Denmark and Sweden mainly.

This small area is by large unaffected by what is going on in adjacent waters (Kattegat to the north and SD 24 to the south). It should be managed in its own right, separate from SD 22 and SD 24.

"In 1932 a trawling ban was implemented in Sub-division 23 (The Sound), due to the heavy shipping activity. The ban was not implemented in a minor area "Kilen" adjacent to Kattegat (SD 21). Half of the commercial catch in this SD is landed by gillnetters, however in "Kilen" the landings has been taken mainly by trawlers. In 2009 Denmark and Sweden agreed on having a cod fishing ban in the northern part of the Sound in February and March. The catches of cod in SD 23 have hereafter decreased from around 2000 t to 1200 t in 2010 and from VMS data it is clearly showed that trawlers are not observed in this area anymore." (ICES)⁷

"..the yield of cod per unit area is about two magnitudes higher in the Öresund than in the Kattegat (Svedäng, 2010). In the Kattegat, the total biomass of cod has declined from over 30 000 t in the early 1970s to less than 2000 t in recent years (ICES, 2012). A very likely prerequisite for this sharp division in productivity, supported by tagging and otolith chemistry analysis (Svedäng et al., 2010b), is the existence of closed subpopulation units in the Öresund and the Kattegat. The rather separate and sedentary cod stock in the Öresund only suffers to a minor extent from exploitation outside the area."⁸

European Parliament - Policy Department B: Structural and Cohesion Policies (2010)

"Long-term impact of different fishing methods on the ecosystem in the Kattegat and Öresund"⁹

7. CONCLUSIONS AND RECOMMENDATIONS - KEY FINDINGS

- It is natural to believe that the much better performance of the cod stock in the Öresund in particular is related to the absence of trawling.
- It is unlikely that the difference is caused by more severe environmental problems in the Kattegat, as the Öresund is enclosed by the most densely human-populated and cultivated area in Scandinavia.
- A prerequisite for these effects of the differences in technical regulations is the existence of separate, rather stationary fish stocks in the two areas.
- It is suggested that fisheries management of the Kattegat has been a fiasco, and the better management of the Öresund is just incidental.
- The findings presented in this briefing paper call for much more restrictive management actions.

Denmark and Sweden propose for angling in SD 23:

1. – No seasonal closure. It is not needed, and will do a lot of harm to charter boats and tourism, which benefit from angling visitors also out of the main holiday seasons. The cod subpopulation in SD 23 is robust, mainly due to the trawling ban in place since 1932.

2. – No bag limit. It is not needed and will do untold damage to the recreational angling sector and its dependant businesses.

Note: The recreational catches are not included the stock assessment. If/when these catches are included the estimated biomass will increase due to that.

SD 24: This area is fished by anglers from Germany, Sweden, Denmark and Poland.

Germany, Sweden and Denmark propose this measure for German, Swedish and Danish anglers (Polish anglers' position is unknown to us):

- A spawning area closure for anglers from 1st February to 15th March in areas with water depths of more than 20 m. (in this area cod spawn at depths >20 m for a period of about two months, mainly in February and March).
- A bag limit is not needed. It would do untold damage to the recreational angling sector and its dependant businesses - charter boating and tourism in particular.

Note: Only German recreational catches are included the stock assessment. If/when the Swedish, Danish and Polish recreational catches are included the estimated biomass will increase due to that.

ENDS

(contacts on next page)

⁷ www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2011/WGBFAS/WGBFAS%20Report%202011.pdf ; page 531

⁸ <http://icesjms.oxfordjournals.org/content/70/6/1081.full>

⁹ www.cfp-reformwatch.eu/pdf/kattegatt_oresund_trawl.pdf

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About EAA and EFTTA:

- **EAA, the European Anglers Alliance** comprises angling organisations from 16 European countries with about 3 million members.

- **EFTTA, the European Fishing Tackle Trade Association** is the leading European trade association for manufacturers and wholesalers of sportfishing equipment. Membership is open to manufacturers, wholesalers, agents and press in the tackle industry.

Anglers waiting for the charterboat
a cold but beautiful December morning
at Helsingør harbour, Denmark.

