

från: **Thomas
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ämne: Regarding ICES advice for Baltic salmon 2022.
skickat balticsalmonfund.com
från:

Dear all,

I wish to share our Position of The Baltic Salmon Rivers Association and The Baltic Salmon Fund concerning ICES advice for Baltic salmon 2022.

The Baltic Salmon Rivers Association is an organization that represents all the Baltic Salmon rivers, and many rivers with a historical presence of salmon, through their individual river management organizations and fisheries rights owners in Sweden.

The Baltic Salmon Fund is created by The Baltic Salmon Rivers Association and has full-time staff. The Baltic Salmon Fund has the goal of achieving sustainable management of wild salmon and trout stocks in the Baltic Sea and our patron is HM King Carl XVI Gustaf of Sweden.

The Baltic Salmon Rivers Association and The Baltic Salmon Fund welcomes and stands completely behind ICES advice. We believe that the advice fully reflects the situation for individual Baltic salmon stocks and is in line with Regulation (EU) No 1380/2013 of the European Parliament and of the EU Council on the Common Fisheries Policy. The advice is also in line with the Species and Habitats Directive, Council Directive 92/43 / EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, where Member States have a designated responsibility for the conservation of salmon and its habitats.

We strongly believe that the management of our stocks must fully incorporate the ecosystem approach, be based on the best available scientific assessments and where necessary utilize the precautionary approach. Salmon stocks must be managed above levels that provide maximum sustainable yield (MSY) and have a size and age structure that maintains ecosystem functions.

ICES advice for 2022 states that there is a possibility for a continued limited catch of salmon in the Åland Sea and Gulf of Bothnia (SD29N - 31) for a total of 75,000 salmon. We would like to point out that this fishery still contains elements of mixed fishing on weak stocks within Assessment Units 3 and 4. This fishery can be modified to reduce fishing on AU 3 and 4 weak stocks such as the Kåge, Åby, Sävarån, Rickleån, Vindelån, Lögde and Ljungan Rivers. Within the Baltic Salmon Fund we actively work to achieve this goal by hiring fishing rights and economically compensating commercial fishermen for loss of income if they do not fish in areas near river estuaries with weak stocks. We believe it is important that Finland and Sweden continue to modify their coastal fisheries and thereby achieve EU goals for our common salmon resource.

We are fully supportive of ICES' advice on the need to restrict both commercial and recreational catches (trolling fishing) where they are based on mixed stock fisheries. We believe that an alternative to completely banning recreational trolling for salmon could be introduction of an EU

regulation for all recreational trolling fishing based on the harvest of only adipose fin clipped fish such as that currently employed in Sweden would be justified. This would reduce impact from recreational fishing on mixed stocks while maintaining opportunity for the recreational fishing. An evaluation by the Swedish University of Agricultural Science (SLU, Dannewitz et al 2018) states that an “effective limitation of the effect of trolling on wild stocks, if this is considered justified, may be mandatory release of all uncut salmon in all member states (same rule as Sweden introduced in 2013), which is expected to result in about 15,000 wild salmon being saved every year approx.”.

Our goal is to contribute to building strong and viable salmon populations in the original Baltic Sea rivers in Sweden as well as in other Baltic Sea countries. To do so, strong measures will be required to reduce the extensive fishing we have today on mixed stocks. The Baltic Salmon Rivers Association and The Baltic Salmon Fund see following ICES advice as a prerequisite to achieving an ecosystem-based and stock-specific management of our remaining wild Baltic salmon stocks. If ICES advice is followed, we can achieve the targets for the stocks set out in the Common Fisheries Policy (CFP) and HELCOM.

We thank you kindly for your time in this matter.

/Best regards

Thomas Johansson
Secretary General
Baltic Salmon Fund
and Chairman of the Baltic Salmon Rivers Association