The ecology of the Baltic Sea and coastal fishing are impoverished by the current administration - EU fisheries management must change!

We, the signatories, strongly question the implementation of the EU Common Fisheries Policy (CFP) and are deeply critical of the fisheries management in the Baltic Sea.

Our starting points are:

- 3 fishing stops and a shortage of large fish in several fish stocks are all signs of growing ecological problems but also evidence of a serious failure for CFP
- So far it is merely the coastal fishing sector that has paid the highest price of this failure with fishing stops and a noticeable decrease in catches, which in turn has led to an increasingly limiting shortage of raw materials in the local processing industry
- We demand that the quota assessment must be based on CFP and the Marine Environment Directive by supplementing MSY with requirements for the size of spawning stocks and their age structure as well as size composition
- In the short term, we see an urgent need for recovery measures; in national and international management, spatial conducting of large-scale industrial fishing must be limited in particularly sensitive areas
- We are very concerned of cascade effects of the extreme high and concentrated fishing pressure on key species throughout the ecosystem

Coastal and local fishermen along the entire Baltic coast are deeply concerned

Coastal fishermen in the Bothnian Sea, the Baltic Sea archipelago and in Hanö Bay are now raising their voices and warning that the herring is about to disappear. In June 2018, the capital's media reported that customers in Östermalm's market hall were left without their traditional midsummer herring. When the newspapers turned to the fishermen who usually delivered the herring, the answer was that there is no longer any herring in the archipelago suitable for human consumption. The issue received wide attention in society and has been discussed extensively in the media since then while the problem continues to worsen. Last year, the entire fermented herring industry was about to lose its entire annual production. The reason was that coastal fishermen who traditionally deliver the raw material, around 400 tons of herring, did not find any suitable herring in the coastal waters. The remarkable thing is that at the same time, the large-scale industrial fishing fleet caught up to 14,000 tons of herring from the same sea area but further out to sea, all of which were shipped, or driven by truck to Denmark and became fishmeal.

Although the focus of the debate of the crisis within coastal fisheries has mainly been on the Stockholm and Bothnian Sea areas, the situation for local fishing sector in the southern part of the Baltic Sea is just as critical, but in a different way. Here, fishing opportunities have been severely limited due to declining stocks. One of two economically viable herring fisheries is already stopped from January 2022 while the other is reduced by as much as 65% in just two years. The hardest hit also here is on the local human consumption-oriented fishing. According to rules established by Swedish authorities, only 14% of the Swedish quota is allocated to regional fishing. These rules were developed almost 15 years ago when the quotas of herring and Baltic herring were generally

considered nearly inexhaustible. Something that today has turned out to be a fatal misjudgment. Now that the fishing quotas need to be dramatically decreased, the rules drive the quotas for the local consumer-oriented fishing far below the thresholds needed to meet today's demand of fillets and other products on the market. In the longer term, small quotas, and the lack of larger herring, risks gradually to knock out the crucial local processing industry. Without a local processing industry, local value-added fisheries con not contribute markedly on the national sea food production. While the local fishing industry is struggling with deteriorating conditions, industrial fishing, just like in the northern Baltic Sea, has continued year after year to catch tens of thousands of tons of herring ground into fishmeal in Denmark.

The fisheries administration is increasingly being questioned – seems like fishing stops are the only relevant tool?

In 2021, the International Council for the Exploration of the Sea (ICES) concluded that there was biological evidence for an over 80 percent increase of the herring quota in the Bothnian Sea. Decision-makers followed the recommendation and increased the quota to the dismay of the local fishing industry. Coastal fishermen estimate that increased fishing opportunities will not lead to increased coastal catches but only increased industrial fishing. Many coastal fishermen fear that if the high fishing catch in the Bothnian Sea continues, a fishing stop will be inevitable. Despite some differences between the local fishing industries in the north and the south, there are two things that are agreed upon. The herring/Baltic herring has decreased dramatically and if you ask for reasons to this, the coastal fishermen point further out to sea at the large industrial trawlers.

For several years, ICES has warned of a worrying development with declining spawning stocks in several of the Baltic Sea fish stocks. When the investigative journalists of radio program Kaliber in autumn 2019, revealed what could be regarded as extensive, systematic cheating in the large-scale pelagic fishery, it was as if a completely new and serious element was thrown into the debate. According to the authorities' own control data, the industrial boats had for years, maybe tens of years, most likely intentionally, have reported large amounts of herring as sprat. This revelation meant that the researchers' calculations of biologically sustainable fishing quotas were probably much less credible than many had hoped for or what was generally indicated.

Coastal fishing, as well as maintaining the fundamental role of Baltic herring in the ecosystem, is dependent on existence of adult herring. Large biomass of small juvenile or barely sexually mature herring is not a sustainable long-term goal. ICES and our local fishermen share the view that the large herring has been fished away, the empty space in the ecosystem has been taken over by other species e.g. spike causing a collapse in parts of coastal ecosystem. Large herring is the basic food for seals, which are now forced to find their way closer to the coast possessing major problems for local fish stocks and for coastal fishing. The risk is also obvious that the high fishing pressure can lead to a genetic selection prioritizing sexual maturity at low age in herring populations, with irreversible consequences for the entire marine ecosystem. Moreover, there is new research that shows increasing evidence for the existence of local populations. Something that today's administration does not consider and which in the worst case may mean that with a high local fishing pressure we are currently destroying genetic information with characteristics that can save fish stocks in the future, for example in step with increasing climate challenges.

Overall, we signatories find it not difficult to agree with the representatives of our local fishing and processing industries who are deeply skeptical to the current fisheries management and consider that it only benefits large-scale industrial fishing. Moreover, we find it extremely worrying that the

EU Commission, Swedish government, and the Swedish Agency for Marine and Water Management continue to believe in an administration that has so far led to not just one, but three ongoing fishing stops and several fish stocks with worrying ecological status. Coastal fishermen do not criticize fishing regulations, they are necessary to save fish stocks. However now when fishing opportunities are dramatically decreasing, CFP and we all are facing a completely new severe challenge regarding utilization of the common resources. If we want to improve the credibility of CFP, it is time to re-evaluate the reasons for why and how we are fishing. The value-added human consumption-oriented fishing sector, including value chains with fishing and processing companies, must be given a much higher priority in the practical policy implementation than short-term profits within an internationalized industrial large-scale fishing.

Large-scale fishing must be limited and the MSY target revised

Today, local fishermen are no longer alone with their concerns. Researchers are widely pointing on fundamental problems in both the national and international fisheries administration. In addition, there is an increasing commitment and support among a growing number of societal actors from anglers, coastal municipalities, and regions to local fishing industry companies to save the Baltic Sea fish stocks and strengthen coastal fishing. We believe that the unilaterally applied MSY goal is a high risk game with the entire Baltic Sea at stake. Repeated pressure on the government and the Swedish authorities has had no very little effect, instead they rely on EU fisheries policy and ICES.

The last ten years have clearly shown the need for a better integrated management. In the absence of it, a combination of national and international administration can lead to devastating both ecological and socio-economic consequences. One such combination of measures is a stock assessment model based on the MSY target alone and introduction of individual and transferable quotas (ITQ). In practice, it is the EU Commission (COM) that defines the term of reference for the applied stock assessment. It is also the Commission alone that decides which assignments are given to ICES. Conversely, ICES delivers strictly according to the assignments given. The annual international decision on quotas made by the Council of Ministers is based on the Commission's proposal. On the other hand, allocation of fishing opportunities and quotas within the national fishing fleets is entirely up to the national authorities.

In 2009, Swedish authorities reformed the quota allocation system in pelagic fishing with the aim of increasing the profitability of fishing companies through a structure adjustment. The reform contributed to the desired increase of boat size thus substantial increase of profitability but also to a marked change in spatial conducting of fishing. Today, an increasing proportion of pelagic fishing takes place in areas where fish is gathering during winter, or prior to spawning. Large accumulations of mature fish in certain well-known locations along the coast are not uncommon in connection with the spawning season. Today with fewer but considerably larger vessels it is possible to catch thousands of tons of fish in a relatively short time from a small area whereas previously the fishing effort was dispersed over larger geographical areas and within a much longer period. As mentioned earlier, given the high likelihood of existence of local/regional populations, beside that this new fishing pattern pose a real ecological threat it leads also to extremely unfair competition with the local fishing fleet aiming at delivering daily caught fish to the processing industry all year around.

Time to go to the bottom and use the EU's fisheries policy for its original purpose

It is a fact that the local, value-added fishing industry has been for some time now shrinking because the EU's Common Fisheries Policy has clearly not fully lived up to its objectives. EU Regulation

1380/2013 states that "*CFP should contribute to a fair standard of living for the fisheries sector, including small-scale fisheries and should secure food supply.*" About the use of common resources (Article 17), it states that "*available fishing opportunities shall be allocated according to transparent and objective criteria based on environmental, social and economic sustainability*". Furthermore, the CFP Objective (Article 2.5j) states that the CFP shall '*comply with Union environmental law, with the objective of achieving good environmental status by 2020 in accordance with Article 1 (1) of Directive 2008/56 / EC* (Marine Environment Directive).

What we are primarily asking for is simply what the Marine Environment Directive states regarding management of commercially used species. According to the directive, there is not just one but three equal primary criteria for calculating the biologically sustainable fishing mortality to be achieved in all stocks:

- MSY
- requirements for the size of a spawning biomass that exceeds that of MSY
- requirements for a natural age and size composition within all stocks

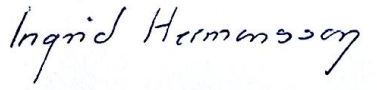
In some cases, based on ICES advice, the Commission has successfully applied management based on these three primary criteria. The best example is salmon, where strong restrictions have been implemented in fishing. We believe that the same management that is applied to salmon is now required to save the herring and Baltic herring stocks in the Baltic Sea. An application of requirements for a healthy size structure would probably balance the catches so that future fishing stops will not be necessary. Obviously, such a fundamental reform would contribute with a marked cut in the fishing mortality thus smaller quotas which in turn with existing quota allocation regime would pose a serious risk for the non-prioritized local value-added fishing sector in Sweden.

We, the undersigned, are convinced that the European Commission, like the coastal fishermen, would prefer to avoid situations where the only way out is a new fishing stop. According to §16 of the Common Fisheries Policy, the EU Commission can, based on new scientific knowledge, raise discussions about the content of the established policy even during the current program period. In our opinion, the MSY goal must be reviewed, preferably replaced with a goal that guarantees better conditions for successful fish management. We are also aware that there is a great deal of support within the science community and even in ICES for this. In summary, we demand that:

- MSY is supplemented with the Marine Environment Directive's descriptor on commercial fishing and its objectives (D3C3) so that requirements for a natural age and size structure are implemented. We want to emphasize that this is something that all Member States have already committed themselves to by signing the EU Common Fisheries Policy.
- Furthermore, we see that it is necessary for industrial fishing to be moved out of the coast, so that local spawning stocks are not eliminated and to recure fair preconditions for human consumption-oriented fishing. A unanimous Swedish parliament has called on the Swedish government to act on the issue. Relocation of the trawl boundary to 12 nautical miles for the large-scale industrial trawling is a first step in the right direction, but more is needed.
- As we consider the situation to be extremely serious in the Bothnian Sea, and a relocation of the trawl boundary will not provide protection from the large-scale pelagic fishery, we propose that a recovery/conservation area in the Southern Bothnian Sea should be established as a matter of urgency. We are very worried that local stocks will be wiped out. Proposals for this have been submitted to the responsible minister from both regional commercial fishing and sport fishing.

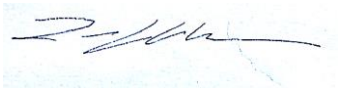
- As we consider the situation as equally serious in Southern Baltic Sea, where the pressure from large-scale pelagic fishing is extremely high, we also propose recovery/conservation areas. We are very worried that local stocks will be wiped out and that large catches of pelagic fish (herring) are likely inhibiting recovery of the eastern cod. E.g., high pelagic industrial fishing effort within cod's feeding in Hanö Bay may deepen the already addressed food shortage of cod and in Bornholm Deep likely pose an additional disturbing factor for schools of spawning cod accumulating in the area.
- In the Åland Sea there is a dynamic and healthy cod stock which may just be one of the last hopes for to recover the Baltic Sea cod. This is a separate but extremely important topic, and we believe that it should be a part of our letter. The precautionary principle should be applied fully, immediately, and protect the Åland Sea from large-scale industrial fishing to minimize the risk of by-catches, or reduced access to herring, endangering this extremely valuable cod stock.

With kind regards,



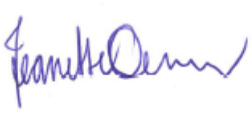
Ingrid Hermansson
Vice Chairman of the Regional Development Committee
Blekinge region

Gustav Hemming
Member of the Regional Executive Committee
Stockholm Region



Jan Lahenkorva
Member of the Regional Executive Committee
Gävleborg Region

Magnus Larsson
Member of the Municipal Executive Committee
Municipality of Karlskrona



Jeanette Ovesson
Chairman of the Municipal Board
Municipality of Simrishamn

Louise Erixon
Chairman of the Municipal Board
Municipality of Sölvesborg

Mikael Löthstam
Chairman of the Municipal Board
Municipality of Hudiksvall

Jacob Spangenberg
Chairman of the Municipal Board
Municipality of Östhammar

Åsa Viklund-Lång
Chairman of the Municipal Board
Municipality of Gävle

Ola Wigg
Chairman of the Municipal Board
Municipality of Nordanstig

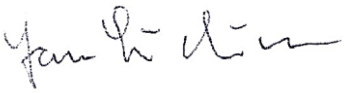
Sara Sjöström
Chairman of the Municipal Board
Municipality of Tierp

Anders Jansson
Chairman
Stockholm County Fishermen's Association

Thomas Nelje
CEO
Ltd Gösta Hannells Fish Saltery

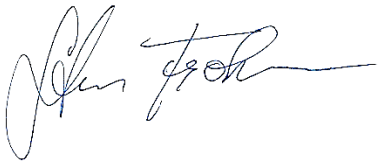
Carl-Åke Wallin
Chairman
Producer Organization for Coastal fishermen in Sea of Bothnia

Nils Erik Sjöström
Chairman of the Board
Association for coastal fishermen in Västerbotten

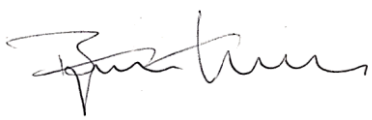


Jan Söderström
CEO
Ltd Oskars Surströmming

Ingvar Lerdin
Chairman of the Board
Producer Organization for Coastal fishermen in Norrbotten

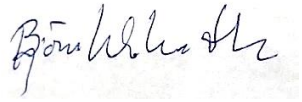


Sten Frohm
Secretary General
Swedish Anglers and fisheries conservation association



Björn Söderberg
Chairman of the Board
Sweden's organized fishing guides

Göran Lagerström
Board member
Skärgårdens Intresseföreningars Kontaktorganisation



Björn Wolrath
Chairman of the Board
Östra Svealands Fiskevattenägarförbund