



**LIFE Platform
Low Impact Fishers of Europe**

7 October 2021

Ms Charlina Vitcheva
Director General DG Mare

Dear Ms Vitcheva

Give Cod and Small Scale Fishermen a Chance

We write to you to express our concerns over the status of cod stocks in the Baltic Sea and call on you and DG Mare to take appropriate action.

ICES advice on cod catches in the entire Baltic Sea for 2022 is a wake-up call and demands an appropriate response as a matter of urgency. This is something small scale low impact fishers in the Baltic Sea have been demanding for years. Despite falling catches over the last 20 years, falling recruitment has left cod stocks in a dire state. The Baltic Sea Members of the Low Impact Fishers of Europe (LIFE)¹ call on the Commission and EU Baltic Sea Member States to secure the future of both the cod stock and the fishing communities around the Baltic Sea.

LIFE urges the Commission and Member States to take all necessary steps to realize the CFP objective to manage fisheries so as to achieve economic, social and employment benefits (Article 2.1). Small-scale low impact fishing activities deliver the highest quality fish which commands the highest prices, targeting medium-sized fish and largely avoiding by-catch. These activities must be given priority to safeguard livelihoods, to safeguard fish stocks, and to deliver fish to local markets. 90% of the fishing fleet in the Baltic is small in scale using low impact passive gears, but currently allocated just 7% of the catch.

We therefore call on the Commission and Member States:

For the Western Baltic cod stock to:

- Set the quota for 2022 as high as possible in line with the catch limits for achieving MSY (Fmsy) and within the framework of the Common Fisheries Policy and the multi annual plan for the Baltic Sea.

¹ FSK PO, Fischereischutzverband Schleswig-Holstein, SYEF, Darłowska PO, Mierzeja boat owners association, and Wolińskie Stowarzyszenie Rybaków,

- Any cod quota should only be made available to small-scale low impact fishing as a by-catch quota
- An effective control of fisheries should be implemented to avoid discards of cod
- Within a short time period to begin a transition towards low-impact fisheries in the Western Baltic Sea.
- To protect spawning cod as proposed by the Commission and to implement proposed measures for recreative fishing
- Investigate and implement control of the by-catch of cod in sprat and other forage-fish fisheries.
- Prioritise all catches for direct human consumption

FSK-PO, the Low-Impact Fishermens producer-organisation in Denmark showed in 2020 that a transition to low impact fishing in area 22, would lead to a more economically viable use of the limited cod quota, as well as delivering on key aspects of the CFP, especially as regards Article 15 which makes discarding illegal and Article 2 which calls for an ecosystems-based approach to minimize negative impacts on the marine environment. We enclose the proposal.

Fishermen should not bear this burden alone. TAC restriction should not be the only medicine used to resuscitate a dying patient. We therefore strongly urge that the other factors, such as pollution, predation from seals and cormorants, dredging and oxygen depletion are handled with the same urgency and gravitas as TAC restrictions, so that fishing communities alone are not asked to carry the entire burden of the declining - and need for rebuilding - of the cod stocks in the Baltic Sea.

For the Baltic Sea ecoregion in its entirety, LIFE therefore calls on the Commission and Member States to:

- Initiate management of top predators as a key component to reach balance in the Baltic Sea ecosystem
- Implement CBD principle 5 on an ecosystem approach, which stipulates that conservation of ecosystem functioning and structure should be a priority, and that restoration of interactions is of greater significance for the long-term maintenance of biological diversity than simply protection of species².
- Adopt a plan for the management of cormorants and fish on wider EU level as demanded by the EU parliament in 2008³.

² Principle 5: Conservation of ecosystem structure and functioning, in order to maintain ecosystem services, should be a priority target of the ecosystem approach. Ecosystem functioning and resilience depends on a dynamic relationship within species, among species and between species and their abiotic environment, as well as the physical and chemical interactions within the environment. The conservation and, where appropriate, restoration of these interactions and processes is of greater significance for the long-term maintenance of biological diversity than simply protection of species. Find full text [here](#).

³ European Parliament resolution of 4 December 2008 on the adoption of a European Cormorant Management Plan to minimise the increasing impact of cormorants on fish stocks, fishing and aquaculture ([2008/2177\(INI\)](#))

- Address the problem of liverworm infestation from grey seals in the cod as a matter of urgency⁴. Fishermen observe the liverworm in over half of the cod in the western Baltic. It's no longer "just" a problem in the eastern part.
- Take action to restrict seal (both grey and harbor seals) predation on cod. The exact impact on the stocks is unknown but around the Baltic fishermen are in no doubt that seals have a large impact on cod populations, and seal-fishery conflict is a major concern in the small-scale fisheries.

LIFE further calls on the Commission and Member States:

- To initiate policies and a science based programme to manage cormorants and seals in the entire Baltic Sea ecoregion, to replace the current single species protection.
- To prioritise scientific studies in ecosystem functioning with the aim to reach an understanding of a balanced Baltic ecosystem with room for fish, seals and small scale fishermen.
- To work cooperatively towards achieving a good environmental status for grey seals for the entire Baltic Sea ecoregion, rather than trying to tackle the issue on a member state basis.

It is high time to implement a genuine ecosystems-based approach to fisheries management, including all fauna so as to reach the desired outcome.

We call on Member States to minimise any direct discharge of hazardous substances into the western Baltic Sea and to stop destructive practices

Pressure on the marine environment from contaminants is high in all parts of the Baltic Sea, and the ecosystem is highly impacted by hazardous substances⁵. Also destruction of coastal habitats, important to fish is being destroyed by sand and gravel extraction.

To address this, we therefore call on the Commission and Member States to

- Stop all deliberate discharge of hazardous substances into the Baltic Sea from industry and from refuse dumping sites.
- Implement an ecosystem-based plan for the extraction of sand and gravel, preventing extraction on key spawning areas, where fish live and where fishermen fish.

Yours sincerely



Executive Secretary
Low Impact Fishers of Europe

⁴ <https://www.aqua.dtu.dk/english/news/2020/10/liver-worms-inflict-fatal-damage-on-the-livers-of-cod?id=83b5d267-b1c3-43c6-b87a-39c30844329a>

⁵ <http://stateofthebalticsea.helcom.fi/pressures-and-their-status/hazardous-substances/>

