

**Low Impact Fishers of Europe comments on the draft proposal:
“Swedish government assignment to conduct a time limited scientific project
corresponding to spatial fisheries management of vessels fishing for pelagic stocks
in the Baltic Sea”**

Low Impact Fishers of Europe support the proposal. It is both necessary and overdue.

The passive gear low impact coastal fishery has declined in recent years due to biomass decline of herring, cod and coastal species. Fishermen across our network in Sweden, Poland, Denmark and Germany all report that demand for their products outweighs the available supply. For example, our Swedish members have to buy in fish from other parts of Sweden or import from abroad in order to supply customers because their catches from the local, coastal resource have declined significantly over time.

It is essential that we have more knowledge and a better scientific basis underpinning our management and decision-making. In the Baltic for many years ICES have reported that there is significant uncertainty in the biomass estimates for the pelagic species. This was repeated in this year’s ICES advice and WGBFAS report. In addition, new knowledge about subpopulations and herring migration patterns are coming from the scientific community and so this project is well timed so that we can have the best quality scientific knowledge available.

The significant declines in western herring, central Baltic herring, Bothnian herring, sprat and both cod stocks has not only threatened our food supply but also made life very difficult for the fishing sector. We believe that this scientific study can help to support generational renewal within the small-scale sector by providing us with a basis that can support sustainable management and stock growth. Without stock growth and better catches we will continue to see an absence of younger fishers.

Socioeconomics:

The small-scale coastal fleet often have income from the value-added services they provide on land or collaborate with the local processing sector. They run or supply restaurants, produce products like herring with onion or cured herring that can be stored for long periods of time and sold at markets. As demand for our products outstrips supply it is absolutely necessary for measures to be implemented that can contribute to an increased available biomass in coastal waters.

In 2024, our members have reported improved herring catches and that the quality is higher with the fish having more fat on its body. This welcome development allows for a higher proportion of the catch to be used and a better kilo price. This is the clear effect that fishing has been kept at a reasonable level for the past two years. We are worried that this growth will now be halted by the decision to increase the quota by an extreme amount in 2025.

This TAC decision will likely undermine the effectiveness of the SWAM proposal and make it harder for its effectiveness to be measured. However, we also see that the proposal is

necessary and something that should have been implemented several years ago in order to mitigate the decline within the coastal fishers' sector.

Why has the supply of herring declined?

It is due to overfishing with F far above the F_{msy} values in the years after 2015. This overfishing has been driven by the unselective industrial fleet segment which delivers unsorted landings for fishmeal products. These unsorted landings are hard for control experts and scientists to accurately estimate the catch composition of. This has added uncertainty and risk to the quota management system with ICES highlighting that catch misreporting is also an issue within this fleet segment.

We recommend that the SWAM proposal is combined with a lower F . These management measures would be complimentary and significantly increase the probability that biomass increases can be realised in coastal waters. In 2024 we saw the benefits of the lower F that had been implemented in the previous two years which improved the SSB.

Environment:

We support this proposal because knowledge about herring subpopulations have been used by coastal fishermen from time immemorial and it is vital that this is evaluated and integrated by the scientific community into their advice. ICES have been clear – they are lacking this knowledge.

Due to the very large management area that is the central Baltic Sea the total allowable catch for the entire area will exceed the recommended F for an individual subpopulation. We do not allow the entire salmon quota to be fished from one river but in the central Baltic herring management system we do not distinguish between spring spawners and autumn spawners. It is clear that our present knowledge base can be strengthened.

Finally, within the coastal fishery we are still hoping that a Baltic cod recovery can happen. In fact, we are disappointed with the lack of effort shown since 2019 when Emergency Measures were implemented by the EU Commission.

We are hopeful that SWAM's proposal will also help us to avoid future situations where the Commission is forced to adopt Emergency Measures after the Council has taken a series of self-destructive quota decisions that failed to account for the dynamics of the Baltic Sea environment.

Maria Overgård's research ([SLU](#)) show that eastern Baltic cod grow well, despite parasitic infestations, if they are fed a supply of herring. Lack of food availability is a key factor in limiting the growth of cod. We see that cod recovery is connected to better herring management and we welcome the SWAM proposal as a measure which can contribute to increases in herring biomass and condition if complemented by sensible TAC decisions.