



**Illegal Baltic
cod discards are
wasting fisheries,
communities &
the environment**



Our Fish

Overview

The Baltic Sea is one of the world's largest bodies of brackish water, connected by the narrow Danish Straits to the North Sea. These mixed salt and fresh waters, and the restricted exchange with ocean waters, create a unique and finely-balanced marine ecosystem, with fish playing a critical role. Combined with runoff from agricultural, industrial and urban lands in the nine countries bordering the Baltic Sea, fishing is one of the most intense pressures on Baltic Sea marine life - making it one of the most threatened marine ecosystems on the planet.

Most Baltic fisheries - particularly the iconic cod stocks - are in serious danger. At its peak in 1984, fishers landed more than 440,000 tonnes of Eastern Baltic cod, but today, with dwindling stocks, they are allowed to bring home less than 40,000 tonnes a year. Eastern Baltic cod are not only shrinking in number, but also in size - individuals longer than 45 centimetres have virtually disappeared. Nine years ago, Western Baltic cod stock also plunged to the brink of collapse, and while it has started recovering, it is still considered very fragile due to poor recruitment. As a result, it has been subject to closures during spawning time, along with severe cuts to quotas, in order to save the stock.

To add insult to injury, even though the landing obligation was introduced in to the Baltic Sea in 2015, it is widely acknowledged that widespread illegal discarding is still taking place. Three years after discarding was banned, unreported discards of Eastern and Western Baltic cod were estimated as having reached 10.1 million fish in 2017.

By failing to properly monitor and enforce the discard ban in the Baltic Sea, Baltic governments risk the sustainability of fish stocks, as well as undermining scientific advice, rewarding non-compliance, penalising selective fishers, and jeopardising the reputation of the EU seafood supply chain through illegal activity.

Why are the Baltic's iconic cod stocks, and the communities that depend on them, being left out in the cold rather than receiving meaningful actions that will preserve and rebuild it?

It is now high time for EU Member States to stop protecting illegal and unsustainable fishing, and instead begin building a future that can deliver secure fish stocks, healthy communities and transparent fisheries management.

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Author
Rebecca Hubbard,
Program Director
Our Fish



Western Baltic cod

The Western Baltic cod stock remains in an extremely unhealthy state. Not only has the population been very low for ten years (excluding a one-off increase), fishing mortality is still significantly higher than what scientists recommend as sustainable¹.

The stock is expected to increase significantly in 2018 due to the incoming year class, however it is predicted to remain below safe levels. Furthermore, this increase is almost totally dependent on one good year class, as previous year classes have been the lowest in the time-series. Therefore, if the increase in catches is not kept within cautious bounds in 2019, the potential stock growth from this one good year class will be lost.

Figure 1. Catches in tonnes: Cod in subdivisions 22-24, Western Baltic stock (ICES 2018).

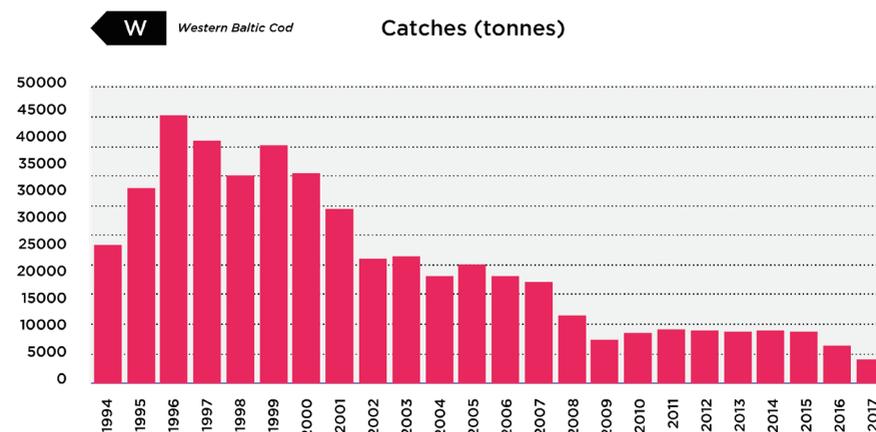
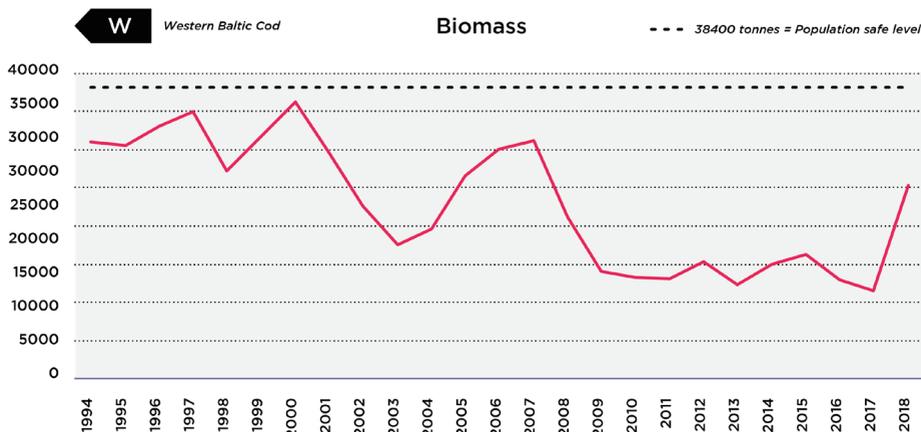


Figure 2. Population size - the black dotted line indicates where scientists estimate the population is safe: Cod in subdivisions 22-24, Western Baltic stock (ICES 2018).



¹ <http://ices.dk/sites/pub/Publication%20Reports/Advice/2018/2018/cod.27.22-24.pdf>

Eastern Baltic cod

The Eastern Baltic cod stock is also in a very poor condition: stock population is below predicted safe levels and fishing mortality continues to be high above what scientists believe to be sustainable².

Stock biomass (population) has been decreasing since 2010, and reached its lowest ever in 2017. At the same time, fishing mortality has increased, since 2011, above what scientists recommend is sustainable, and more than doubled since 2013.

Fisheries ministers in the Council of the European Union have set annual fishing limits so far above scientific recommendations every year since 2009, that catches have not even been restricted by this limit. This is a clear indicator of how ineffective and poor the management of Eastern Baltic cod has been. Moreover, the EU Commission has not helped to improve this situation for 2019, by proposing an unnecessarily high fishing limit that far exceeds scientific advice.

Figure 3. Catches in tonnes: Cod in subdivisions 24-32, Eastern Baltic stock (ICES 2018).

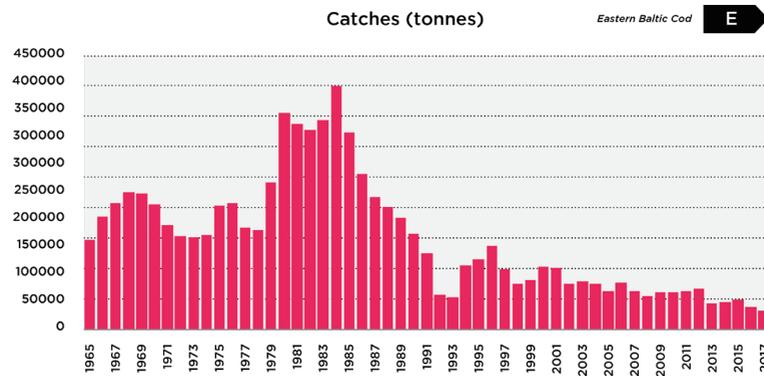
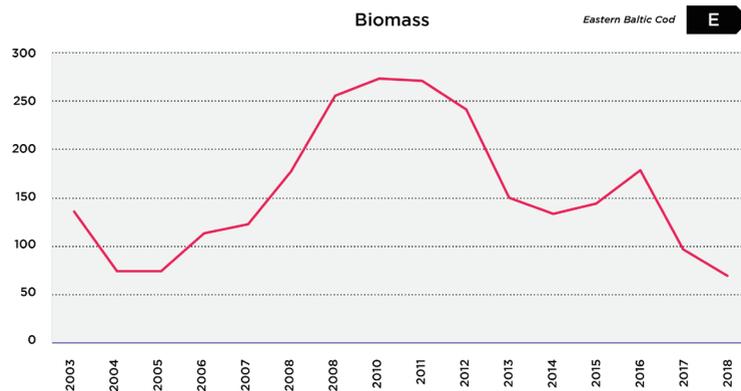


Figure 4. Population size: Cod in subdivisions 24-32, Eastern Baltic stock (ICES 2018).



Discards of Baltic cod stocks - by the numbers

The International Council for the Exploration of the Sea (ICES) assesses Baltic cod stocks each year, and uses information on the amount of fish reported landed by fishers, and compares with the amount of fish they expected to be landed, based on data collected at sea by scientific observers. Since the landing obligation has come into effect in 2015 in the Baltic, it is startlingly clear that enormous quantities of these overfished stocks continue to be discarded at sea, illegal and unreported.



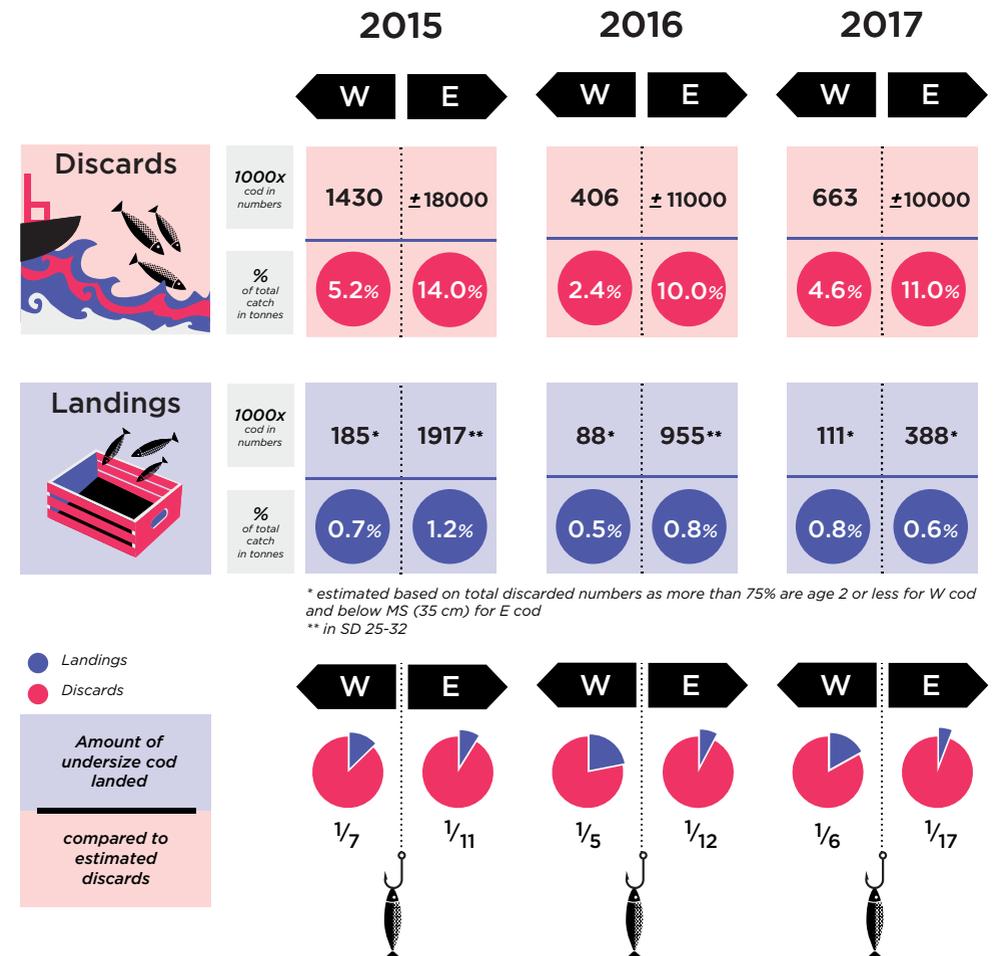
Discards = throwing unwanted fish and other sea-life back into the sea, most of it dead and dying. It's extremely wasteful, and for all fish stocks with quota in the Baltic, it is now illegal.



Landings = all fish caught in the Baltic sea should be counted and brought to land. For Baltic cod, most unwanted catch is because it's too small, so here we compare estimated discards with landings of fish below minimum size.

W Western Baltic

Eastern Baltic E



2 <http://ices.dk/sites/pub/Publication%20Reports/Advice/2018/2018/cod.27.24-32.pdf>

Who wastes the most cod?

Discards are a result of unwanted fish being caught, and in the case of Baltic cod, this is largely comprised of undersized fish, approximately half of which are too small to reproduce. The landing obligation aims to ensure that all unwanted fish have to be documented, counted against quotas, and landed (where they cannot be sold for human consumption), in order to provide a market incentive for avoiding the unwanted catch in the first place.

As long as illegal discarding is allowed to continue, there is no incentive for fishers to adopt more selective gears and practices, as it costs them nothing to waste the resource.

*"Western Baltic Cod discard amount is 191 tonnes in 2017 (approximately 4.6%), based on observer data, an increase from 2.4% in 2016 due to the strong 2016 year class entering the fishery."*³

While Western Baltic cod has suffered chronic overfishing and population decline for many years, it recently experienced a random extraordinarily high recruitment, which has resulted in a large number of small fish entering the fishery at once. While these small fish provide hope for a brighter future, other strong recruitments have not been observed since, and indiscriminate non-selective fishing techniques risk its chances of making a lasting difference to rebuilding the stock.

Re-allocating quota to fishers that use more selective gear minimises impact on the fish stocks and helps to rebuild regional fishing communities.



Table 1. Total discards of Western and Eastern Baltic cod in tonnes and numbers (1000x) per year and gear type.

Numbers of unwanted cod (thousands)		2015		2016		2017	
		W	E	W	E	W	E
Active		99	15964	49	10889	220	9338*
Passive		96	2386	30	296	96	704*

W Western Baltic Cod
in SD 22-23. Note that in SD24 the difference between active and passive gears discard rate is higher.

E Eastern Baltic Cod
in SD 25-32.

*estimated based on total discarded numbers as more than 75% are age 2 or less for WBC and below MS (35 cm) for EBC.

3 <http://ices.dk/sites/pub/Publication%20Reports/Advice/2018/2018/cod.27.22-24.pdf>

Monitoring and control in the Baltic

During 2017, the European Fisheries Control Agency (EFCA) joined BALTFISH, the regional fisheries management group, to carry out a full compliance evaluation for the landing obligation⁴. EFCA concluded, based on interview of expert controls, that "compliance is considered to be very low; problems with cod are more prevalent in the Eastern Baltic Sea; most compliance problems with vessels using towed gear."

While it's difficult to assess how much each Member State knows about its fleets' flouting of the law - public access to monitoring and control reports from Germany, for example, is flatly refused - the Danish Fisheries Agency⁵, based on last haul inspection data, has reported that *"on average, the proportion of cod below minimum size in the Baltic Sea was found to be 13.2% but that fishers report in the logbook often less than 1%."*

Table 2. Baltic cod: catch below minimum size (MS) as estimated from last-haul analysis between 2015-2018 (Jan-Mar) as compared to reported landings below MS; discard rates are in % by weight.

		<MS catch (last-haul inspection)	<MS catch (last-haul inspection)	<MS catch (last-haul inspection)	<MS landings (reported)
		2015	2016	2017	2017
Western Baltic Cod	W	7.0%	6.5%	3.7%	0.8%
Eastern Baltic Cod	E	9.8%	11.9%	10.9%	0.6%

4 https://www.efca.europa.eu/sites/default/files/atoms/files/Annual%20Report%202017_0.pdf page 63-64

5 <https://fiskeristyrelsen.dk/media/10166/aarsrapport-fiskerikontrol-2017.pdf>

6 <http://ices.dk/sites/pub/Publication%20Reports/Advice/2018/2018/cod.27.24-32.pdf>

7 Ditto

8 ICES. 2018. Baltic Fisheries Assessment Working Group (WGBFAS), 6-13 April 2018, ICES HQ, Copenhagen, Denmark. 727 pp. <http://www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2018/WGBFAS/O1%20WGBFAS%20Report%202018.pdf>

Not only is landing data becoming poorer quality due to widespread non-compliance with the discard ban, but independent observers, who are not responsible for control and enforcement, and are usually on board less than 1% of trips, are being refused access to vessels:

*"There have been increasing problems gaining observer access in some countries. Thus, 11% discards estimate in 2017 is considered to be an underestimate."*⁶

Not only are the industry not trying to minimise discards, they may be increasing them on purpose: In Eastern Baltic Cod fisheries *"modifications to the selectivity properties of the gear has occurred and a higher proportion of smaller fish is being caught."*⁷

*"For 2015-2016, official Eastern Baltic Cod Below Minimum Size (BMS) landings are not possible to show separately, due to inconsistencies in data reporting and submission in different countries. The available information indicates that BMS landings in these years were a very small fraction of total landings, similar to 2017."*⁸

Conclusion and Recommendations:

It is clear that since we published our report "Thrown Away: How illegal discarding in the Baltic is failing EU fisheries and citizens"⁹ in 2017, nothing has changed. An astonishingly high level of Baltic cod is still being discarded against the law, and with full knowledge of Member State fisheries ministries.

Considering that independent indicators suggest that 10.1 million Western and Eastern Baltic cod were illegally discarded and not counted towards catches in 2017, why do Baltic Member State governments such as Denmark, Sweden, Poland, Germany, Latvia and Lithuania not require affordable, effective remote electronic monitoring systems to be carried and used on board all vessels considered at risk of discarding?

In what other industry, would the government turn its head when told that 85% of an activity is suspected to be illegal?

In what other industry, would monitoring of less than 1% of activity for compliance with the law be considered adequate?

Member State governments must act now to bring fishing industry practices into line with the law, and ensure a just and efficient transition to more selective, sustainable fishing, if we are to preserve the iconic Baltic cod and the trust of EU citizens and seafood buyers.

In October 2018, Fisheries Ministers from Baltic Sea countries have the opportunity, and an obligation, to set things right, by:

- 1 Following scientific advice and setting annual fishing limits at sustainable levels in line with CFP requirements;
 - 2 Requiring fleets with an increased risk of discarding to demonstrate that they are compliant with the law through the use of Remote Electronic Monitoring (REM) and closed-circuit video surveillance or on board observers; and
 - 3 Setting fishing limits in line with the ICES advice for wanted catch, with 'quota top-ups' for unwanted catch only granted to fleets that demonstrate full compliance with the Landing Obligation, through the use of REM.
- At home or at a regional level, Member States must prioritise:
- 4 Ensuring undersized fish are not caught in the first place, by requiring the use of more selective fishing gear and practises; and
 - 5 Re-allocating a greater share of the national quota to those in the fishing industry who have minimal impact, and can demonstrate they are complying with the law.

9 <http://our.fish/publications/thrown-away-how-illegal-discarding-in-the-baltic-sea-is-failing-eu-fisheries-and-citizens/>

