

Feedback by EFFOP – Marine Nutrients Europe to “Fisheries management rules revision – Omnibus”

Regarding the Multiannual Plan (MAP) for the Baltic Sea:

At EFFOP - Marine Nutrients Europe, we support the removal of the 5% rule under Article 4(6), as we consider its application to be disproportionate and not aligned with scientific advice.

We strongly believe that scientific advice from ICES must always be the foundation for fisheries management decisions. We underline that ICES scientists already apply a precautionary approach, taking into account both stock assessments and the uncertainties inherent in their models. We therefore believe that the setting of Total Allowable Catches (TACs) and quotas should consistently be based on ICES advice rather than on assumptions about undocumented relationships between fisheries and the ecosystem.

We underline that ICES published its advice for fishing opportunities in 2027 at the end of May 2026, including advice for pelagic species in the Baltic Sea. The most recent assessments show that several key pelagic stocks are now at or above the precautionary and sustainability reference points used in fisheries management.

The scientific advice for 2027 shows the following developments:

1. Sprat in the Baltic Sea: advice increased by 44%
2. Herring in the central Baltic Sea: advice increased by 74%
3. Herring in the Gulf of Riga: advice increased by 8%
4. Herring in the Bothnian Sea: advice increased by 44 to 45%

We emphasise that the latest ICES advice clearly demonstrates that several pelagic stocks in the Baltic Sea are recovering within the current management framework. We consider the substantial increases in catch advice for sprat and herring stocks across several areas as clear evidence that rebuilding is taking place, despite continued environmental pressures.

At the same time, we note with concern that the Commission has in recent years applied Article 4(6) in ways that do not align with ICES scientific advice. We believe that Article 4(6) has been given disproportionate importance within the management framework and that its application is not appropriate from a long term perspective.

We also underline that the current political debate on further reductions in fishing opportunities in the Baltic Sea risks overlooking the main pressures affecting the ecosystem. We stress that reductions in fishing alone do not address key challenges such as nutrient loading, eutrophication, oxygen depletion, habitat degradation, contamination, climate impacts, and the effects of predators such as seals and cormorants.

Finally, we strongly emphasise that the long term recovery of the Baltic Sea will primarily depend on addressing these broader environmental pressures. While fisheries management remains important, we underline that fisheries alone cannot resolve the complex ecosystem challenges identified by ICES, HELCOM and the Commission.

We therefore believe that future policy decisions should be guided by robust scientific evidence, proportionality and a balanced assessment of all pressures affecting the Baltic Sea ecosystem, rather than by assumptions that further fishing restrictions alone will deliver recovery.