



Document title	CCB comments to the HELCOM FISH work plan
Code	8-4
Category	CMNT
Agenda Item	8 – Future work, including work on indicator developments for holistic assessments
Submission date	8.5.2018
Submitted by	Coalition Clean Baltic
Reference	Documents 8-1, 2-3 and 1-2

CCB comments to the HELCOM FISH work plan

As a general note, CCB must underline the lack of implementation of the BSAP and the Ministerial declarations (see document 2-7 CCB information items civil society declaration and joint letter to Ministers). As presented in document 2-3 to this meeting, a large number of actions are not done or are failing the deadline. The work plan must focus and address such measures now.

CCB questions the removal of the measures listed earlier in the work plan regarding eel, measures that go beyond the national plans. A strong focus on international management of eel such as joint actions during migration period should be put back in the FISH work plan. Regional collaboration on traceability should also remain a priority to tackle illegal catches and sales across the region. A research project led by scientists to mainly address needed improvements of monitoring and assessment is welcomed, but such a project will likely not develop management proposals. Such joint actions must be a priority for HELCOM discussions as a part of that work. CCB therefore thinks this should be clarified in the work plan and discussed by the meeting.

Finalization on set tasks related to salmon must speed up. Regardless of the development of a new salmon MAP, the matters outside the scope of that plan must be addressed. To support the implementation of a new management plan, there is great need for collaboration on and agreeing on the future of measures such as rearing and releasing, recreational fishing, links to sea trout fishing and protection of sea trout stock also affected by the fishery closer to the coast etc. CCB hopes that these discussions can take place in HELCOM FISH 8-2018 now, setting a plan for moving forward and not be postponed any longer.

Ghost nets and creating a common knowledge base on distribution is listed in the work plan. CCB wants to repeat earlier statements that also nets from recreational fishing must be clearly mentioned and be part of this work.

Action requested

The Meeting is invited to consider revising the Work Plan to:

- a) reinsert measures regarding international cooperation and coordination of targeted measures in the region regarding eel to safeguard open migration routes throughout the region, not awaiting a potential research project;
- b) underline the need to finalise measures and joint recommendations listed in BSAP regarding rearing and releasing of salmon;
- c) discuss harmonizing rules for recreational fishing for salmon such as bag limits etc.; and
- d) clearly note that focus on ghost nets also includes nets lost in the recreational fishing sector