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Concerning Baltic Salmon - illegal, misreported and unreported commercial fishing

We, the members of the European Angler's Alliance are writing to you concerning the suspected large scale misreporting of commercial catches of Baltic salmon.

Recreational angling/sport fishing for salmon is a well-developed tourism segment, which prospers in countries such as Norway, Canada, Ireland, Scotland and Russia. Since 2013 the trend for numbers of returning salmon to Baltic rivers has been positive and this in turn has resulted in a growing blue economy in Finland and Sweden based on sport fishing for Baltic salmon.

The current economic output and the benefits to the local communities in isolated rural areas are immense and will continue to grow if allowed.

The Council of Ministers and EU Commission have both pointed out that the return of Baltic salmon is one of the success stories for European Union fisheries management. Unfortunately returns of salmon in 2017 were surprisingly low and there is a worrying increase in mortality from the salmon disease M74 that in the 1990's decimated Baltic salmon stocks. Now, on top of that there is clear evidence of the return of large scale misreporting in the Polish commercial fisheries for salmon. If misreporting is not brought to a halt it represents a serious threat to the health and viability of a number of Baltic salmon stocks as well as all the businesses dependent on the recreational fisheries on these stocks.

The problem of misreporting of salmon as sea-trout within the Polish commercial fishery is not new. In 2010 over 65 500 salmon (38% of TAC) were by ICES estimated to be misreported as sea-

trout. During this period the general trend for salmon was negative and salmon stocks in several rivers were perilously close to extinction. Focus was placed on control of the salmon fishery in 2011-12 and that coupled with quota reductions led to the current positive trend for Baltic salmon. ICES now believe that false reporting of salmon as sea trout has once again grown and if this problem is not solved then Baltic salmon stocks will again be threatened.

The *ICES WGBAST REPORT 2018*¹ (p38) estimated that total misreporting in 2017 in the Polish fishery was 30 500 salmon, almost twice as much as estimated for 2016. 30 500 salmon are almost 31% of the Baltic salmon TAC for 2017 and the falsely reported catch is potentially 500% larger than the total Polish quota for salmon in the Baltic main basin. This is an extremely alarming increase in false reporting that can have serious effects upon small salmon river populations.

The European Commission is in the process of finalizing a multiannual management plan for Baltic salmon stock. If the plan is to be successful it will require confidence in management and fisheries control by all parties including river fisheries rights owners, recreational anglers/sports fishermen and river associations. With this in mind and due to the alarming problem of false reporting of salmon as sea trout we believe it essential that this problem is once again addressed and resolved.

We would be very interested in knowing the opinion of the European Fisheries Control Agency about this suspected problem and if the EFCA is set to act on it?

EAA is more than willing to co-operate where we can in increased control of the salmon fishery.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Fred Blot', with the name 'Fred Blot' written in a smaller font below the signature.

Fred Blot, President of the European Anglers Alliance (EAA)

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¹ **ICES WGBAST REPORT 2018**; Report of the Baltic Salmon and Trout Assessment Working Group (WGBAST), 20–28 March 2018
http://ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2018/WGBAST/01%20WGBAST%20_%20Report%20of%20the%20Baltic%20Salmon%20and%20Trout%20Assessment%20Working%20Group.pdf