



Letter 30.4.2024

DG MARE
European Commission

Amending the conditions of the scientific fisheries for salmon in Finnish waters of subdivisions 29N and 30 in 2024 following the advice of STECF

The Ministry of Agriculture and Forestry 26.2.2024 informed the Commission of scientific salmon fisheries in subdivisions 29N and 30 in 2024 and 2025 in accordance with Article 25(1) point e).

The Commission subsequently sought the advice of STECF on the scientific fishery and STECF gave its assessment in its report (STECF-PLEN-24-01) from the 75th plenary.

STECF concludes that the objective of the proposed scientific fishery is unclear. Specifying this objective is essential to developing an appropriate sampling protocol. As mentioned above, the sampling strategy depends on the question at hand, and in many cases could target certain areas or time periods, decreasing the number of salmon potentially caught and the number of vessels required.

- (1) STECF concludes that the added value of the proposed scientific fishery is unclear in that the number of vessels is not justified on scientific grounds. If such a fishery is allowed, once the objective is clearly specified, STECF suggests that the number of salmon to be caught and the number of vessels could be determined by the Finnish authorities using pre-existing knowledge on the spatial and temporal distribution of salmon.
- (2) STECF concludes that, if a scientific fishery is allowed, it would be worthwhile specifying the measures put in place to ensure that commercial fishermen comply with the scientific protocol.
- (3) STECF concludes that to reduce the potential impact of the sampling programme, consideration could be given to releasing wild salmon to deliver the same scientific results while limiting the risk of detrimental impacts on the depleted population. This is justified given the survival of salmon from trap nets has been shown to be greater than 70%.

Based on the above conclusions of STECF the Ministry of Agriculture and Forestry will in accordance with Article 25(1) point e) supplement the objective and conditions of the scientific salmon fisheries for 2024 as follows:

1. The objective of the scientific salmon fisheries are as earlier outlined *“to verify if a delayed start of the coastal salmon fisheries together with effort restrictions can be conducted without or with negligible catches of salmon from the Ljungan stock, and thereby be comparable and an alternative to a closure of directed salmon fisheries, which is based on a zero tolerance advice and policy.”*

As an amendment based on the conclusions of STECF this objective is further specified with the following sentence “*The scientific salmon fisheries will be conducted with the necessary number of fishing vessels needed and salmon caught to achieve a representative sample of salmon populations in the fishing areas and time periods within four nautical miles along the Finnish coastline in SD:s 29N and 30 that in 2024 are closed to directed salmon fishing due to possible occurrence of Ljungan salmon. The scientific fisheries will not simulate a full fishery.*”.

This translates into a higher minimum salmon catch from 20 to 64 salmon either in 2022 or 2023 for allowing fishing vessels (commercial fishers) to participate. That will bring down the number of vessels from 45 to 32, which is approx. 50 % of all the vessels in use in 2022 and 2023. This reduction still maintains the necessary spatio-temporal coverage in the large coastal areas of SD:s 29N and 30, while not simulating the full fishery.

The forecasted salmon catch following such a reduction could be based on catches in 2023 be approx. 3 650 salmon (earlier setup 4 300 salmon, catch in 2022 approx. 5 300 salmon) of which an estimated 2 550 salmon (earlier setup 3 000 salmon) would be of wild origin (70 %) and included in the data collection in the form of scale samples and biometric information. The scientific salmon fisheries would thereby collect a representative sample of the salmon populations in the applicable waters with sufficient spatio-temporal coverage, while still not simulating the full fishery.

Since the coastal salmon fisheries are conducted with fixed / passive gear (trapnets and fixed nets) the catch ultimately depends on the number of returning salmon and their migration routes. Unlike trawling and other active gear types salmon cannot be actively chased and caught.

The pre-existing knowledge on the spatial and temporal distribution of salmon that STECF mentions is limited and dated as also STECF mentions, and the occurrence is otherwise based on modelling such as in the Whitlock et al. publications (2018 and 2021) and in ICES reports. Therefore it is not possible to make a further limitation of the number of vessels and salmon catch or spatio-temporal coverage of the scientific salmon fisheries, without risking its representativeness and value as evidence in further scientific work and decision making. The sample needs to give a conclusive picture of the salmon populations in the Finnish coastal salmon fisheries in SD:s 29N and 30. The current knowledge does not indicate where the highest or lowest risk of catching Ljungan salmon are. This is also indicated in a letter from ICES of 17.4.2024 saying that “...it was not possible to give advice on areas and/or times to avoid catching the Ljungan salmon stock”.

The main and most important limitation in addition to the number of vessels in the scientific setup is the delayed start of the scientific fisheries that is based on scientific evidence showing an earlier onset of spawning migration for wild salmon, as mentioned in e.g. Whitlock et al.,

2018. Thereby most Ljungan salmon may already be close to the native river on the Swedish coast before the scientific fisheries on the Finnish coastline commence.

2. Following the conclusion of STECF that it could be worthwhile specifying the measures put in place to ensure that commercial fishermen comply with the scientific protocol, the Ministry informs that all applicable inspection and control provisions and measures will also apply to the scientific salmon fisheries and they will be reinforced with an immediate loss of the special fishing authorisation for the scientific fisheries if the conditions and requirements of the permit or data sampling are breached. Data sampling, effort restrictions and delayed starting dates will be specific requirements for participating in the scientific fisheries.
3. On the STECF consideration of releasing of wild salmon the Ministry concludes, that this is not an alternative since taking the samples from the scales of wild salmon individuals is crucial for collecting relevant information on the river origin of wild salmon individuals. The scale samples cannot be taken without harming the wild salmon individuals and raising the risk of causing a high mortality of the released individuals.

Furthermore the incoming Delegated Regulation on an exemption for salmon from the landing obligation when fishing with trapnets requires that when discarding salmon caught with trapnets and fyke nets, the salmon shall be released immediately back into the sea, which does not allow a weighing, measurements of length, sex identification and especially scale sampling of live salmon before release, as the data sampling in the scientific fisheries requires.

Also the national legislation in Finland requires that caught and retained fish are killed as rapidly and painlessly as possible, whereas fish that are released must be treated as carefully as possible.

In the Åland Islands the scientific salmon fisheries are conducted with fixed nets, which does not allow for a release of wild salmon due to the landing obligation and since the fish are damaged in the netting.

As a conclusion of these facts, it is evident that to meet the requirements of the collection of relevant data, the wild salmon individuals in the scientific fisheries have to be retained as a catch and killed.

Finland has at the Agriculture and Fisheries Council in October 2023 underlined the absence of adequate science for decision making on prohibition of directed salmon fishing in SD:s 29N and 30. Finland however agreed to a procedure according to which ICES was to give advice on the possibility of strictly managed salmon fisheries as an alternative to a prohibition of directed salmon fishing in the areas. ICES however was not in a position to give the requested advice in time before the salmon fisheries starts.

Therefore the Ministry of Agriculture and Forestry on 26.2.2024 informed the Commission of its intention to conduct scientific salmon fisheries with 45 vessels and forecasted catch of 3 000 wild

salmon. The Commission sought the advice of STECF, which gave its report 29.3.2024. Based on this report the Ministry 18.4.2024 presented a draft amended scientific plan (37 vessels and forecasted catch of 2 700 wild salmon) for the Commission. The Commission responded 26.4.2024 with the opinion that the amended scientific plan does not sufficiently take into account the assessments of STECF.

Following this the Ministry of Agriculture and Forestry made a further amendment of the plan restricting the participation to the scientific salmon fisheries for vessels with at least 64 reported salmon in 2022 or 2023 and consequential reduction of the number of vessels and the forecasted salmon catch (32 vessels and 2 550 wild salmon) as described above. This reduction still maintains the necessary spatio-temporal coverage and data sampling in the large coastal areas of SD:s 29N and 30, while not simulating the full fishery.

The Ministry of Agriculture and Forestry will hence in accordance with Article 25(1) of Regulation (EU) 2019/1241 run the scientific salmon fisheries in 2024 as amended above following the STECF advice.

The amended list of the external identification numbers of the 32 Finnish commercial fishing vessels that will be authorized for scientific salmon fisheries in SD 29N and 30 in 2024 is given below. A vessel may be changed for another vessel to form a final list of vessels before the scientific directed salmon fisheries start.

Best regards,

A handwritten signature in black ink, appearing to read 'Risto Lampinen', with a stylized flourish at the end.

Risto Lampinen
Director of Unit for Fisheries Industry

Mainland Finland vessels		Åland Islands vessels	
1	FIN-31258-T	1	AAL-221
2	FIN-31381-T	2	AAL-228
3	FIN-31425-V	3	AAL-3393
4	FIN-31463-T	4	AAL-3491
5	FIN-31551-T	5	AAL-3629
6	FIN-31568-T	6	AAL-3651
7	FIN-31572-T	7	AAL-3662
8	FIN-31725-T	8	AAL-3666
9	FIN-31953-T	9	AAL-3699
10	FIN-31973-V	10	AAL-3704
11	FIN-31986-T	11	AAL-3711
12	FIN-31991-V	12	AAL-3712
13	FIN-32082-V	13	AAL-3722
14	FIN-32133-V	14	AAL-3724
15	FIN-3521-U		
16	FIN-3545-U		
17	FIN-3789-T		
18	FIN-3830-T		

