Joint NGO recommendations on Baltic Sea fishing opportunities for 2027

1. Introduction

The poor status and decline of many Baltic Sea fish populations have been thoroughly documented over several decades, indicating that the entire ecosystem is in great distress.[1] So far, policy interventions have not reversed, or even halted, the negative trend concerning many of these populations. The European Commission itself recently recognised in its Common Fishery Policy (CFP) evaluation report that progress on stock rebuilding is lacking and the number of stocks "*threatened by collapse due to impaired recruitment has increased during the reporting period*".[2]

Fish populations that once formed the cornerstone of the Baltic Sea fishery, such as the eastern and western Baltic cod and the western Baltic herring, are now doing so poorly that the International Council for the Exploration of the Sea (ICES) is advising zero catch for these stocks.[3] Yet, even with the targeted fishery being closed for some years now, none of these three stocks are showing sufficient signs of recovery.[4] The condition (such as size and weight-at-age) of many flatfish populations, such as plaice, also raises alarm bells. The salmon spawning migration has fallen short of the target level in the past three years[5]. As a result, even the healthiest salmon stocks are now unlikely to produce enough smolts corresponding to sustainable levels in the coming years.

To address the crisis facing Baltic populations and the broader ecosystem, political will and ambition to improve fisheries management, alongside full implementation of the CFP provisions, are needed. The recent INI report on the Baltic Sea Multi-Annual Plan shows that the European Parliament recognises the importance of ecosystem-based fisheries management as well as the need for consideration of environmental legislation when making decisions on fishing opportunities.[6] Fisheries managers must now act swiftly and decisively on

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[1] See for instance the HELCOM HOLAS assessment (HELCOM (2023): State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194).

[2] European Commission (2026). SWD(2026) 120 final. COMMISSION STAFF WORKING DOCUMENT EVALUATION Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy. https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2026)120&lang=en. 30 April 2026. Referred to as "CFP evaluation report" throughout this document.

[3] This has been the case since 2019 for western Baltic herring, 2020 for eastern Baltic cod, and for the first time this year for western Baltic cod.

[4] We are also concerned about the phenomenon of "phantom recoveries", where biomass increases for depleted stocks do not materialise as projected, and/or the stock situation in hindsight turns out to be worse than previously assumed. For example, a recent study by Froese et al. highlights that indeed the biomass of Western Baltic cod has been repeatedly overpredicted. Froese, R; Steiner, N; Papaioannou, E; MacNeil, L; Reusch, T B H; Scotti, M (2025). Systemic failure of European fisheries management. Science 388(6749), pp. 826-828. DOI: 10.1126/science.adv4341. May 2025. See figure on p. 827, showing "*examples of previous unrealistic estimates and forecasts made by ICES in 2015 and 2018 to 2021*".

[5] S. Palm et al. (2025). Joint SWE/FIN report on salmonids in Torne älv, page 5: SLU ID: SLU.aqua.2025.5.1-27 Luke ID: 501/11 00 03/2020

[6] European Parliament resolution of 21 May 2026 on the multiannual plan for the Baltic Sea and ways forward (2024/2127(INI)) https://www.europarl.europa.eu/doceo/document/TA-10-2026-0189_EN.html

the commitment the Commission and Baltic Sea Member States made at last year's October Agrifish Council to rebuild Baltic Sea stocks[7].

This document presents the joint NGO recommendations regarding Baltic Sea fishing opportunities for 2027, prioritising long-term ecosystem health and sustainable fisheries management over short-term economic interests. The recommendations are based on the ICES advice, the objectives and requirements of the CFP[8] and the Baltic Multiannual Plan (MAP)[9], specifically to apply the precautionary approach and implement an ecosystem-based approach to fisheries management, and the objective of achieving Good Environmental Status (GES) under the Marine Strategy Framework Directive (MSFD)[10]. Last year's overarching joint Briefing Series on TAC-setting, co-signed by almost 30 organisations across the EU and the UK, including environmental NGOs, recreational fishers, and fishing rights owners, remains valid and provides further context, background and detailed explanations on the cross-cutting issues raised below.[11]

2. Urgent need for recovery-focused, precautionary and ecosystem-based fishing opportunities

The Commission's recent CFP evaluation report highlights that "*the sustainability of fisheries resources and aquatic ecosystems*" is "*the necessary underpinning for long-term economic competitiveness, fair living conditions and sustained employment, as well as the continued availability of seafood supply from fisheries and aquaculture*".[12] It also emphasises that "***Minimising damages to and avoiding degradation of marine ecosystems is not just an environmental necessity but a long-term investment for resilient and profitable fishing and aquaculture sectors***".[13] Importantly, the Commission concludes that "*The CFP Regulation provides a coherent mechanism to reconcile its three core objectives (environmental, economic and social sustainability): when stocks are healthy, the fleet has the opportunity to make a profit which can then be translated into employment and/or wage benefits. Perceptions of incoherence are linked to uneven implementation that break the links in this logical chain: if healthy stocks are not achieved, there can be no socio-economic viability*".[14]

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[7] As referred to in the Commission's press release on the outcome of the October AGRIFISH Council and included in the draft minutes thereof (14646/25), p. 13.

[8] Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32013R1380

[9] Consolidated text: Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R1139-20240710

[10] Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0056&qid=1749646185087

[11] ClientEarth et al. (2025): Joint Briefing Series: Recommendations to the EU and the UK on fishing opportunities. 17 July 2025. https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/.

[12] European Commission (2026). CFP evaluation report, p. 16.

[13] *Ibid*., p. 22.

[14] *Ibid*., p. 76.

Against this backdrop, the lack of effective efforts to date - in the Baltic Sea and elsewhere - to rebuild struggling and depleted fish populations, and insufficient progress in operationalising the ecosystem-based approach to fisheries management[15] is both alarming and nonsensical.

For example, the prevailing political response to declining fish stocks in the Baltic Sea has been problematic, characterised by the Council of Ministers' reluctance to adhere[16] to the spawning stock biomass safeguard rules in the legally binding Baltic Sea MAP. For three consecutive years, the Council has set fishing limits for certain stocks at levels that are higher than permitted[17] under Art 4.6[18] of the MAP, thereby increasing the risk of fish populations falling dangerously low on biomass. It is a key safeguard, aimed at minimising the risk of population depletion through fishing.[19] A legal case regarding unsustainable fishing limits in the Baltic Sea,[20] which at the time of writing this document is still ongoing, may shed more light on what this important provision means for the setting of fishing opportunities going forward. Attempts to remove, rather than implement, such safeguards put at risk already depleted and struggling fish populations. The resurfacing of the topic in the Commission's recent call for evidence on a MAP Omnibus[21] is worrying and must not lead to a weakening of this essential safeguard.

Furthermore, despite the CFP requiring that fishing opportunities be set in accordance with the precautionary approach (Art. 2.2) and that fisheries management must implement the ecosystem-based approach (Art. 2.3.), the Council has repeatedly set fishing opportunities that are inconsistent with these obligations for a number of stocks.[22]

Persistently fishing on declining and vulnerable fish populations is fundamentally unsustainable in the long term, both for the fishing sector that depends on healthy stocks and for the wider marine ecosystem. Fishing depleted or vulnerable fish populations at, or even above, the Maximum Sustainable Yield (MSY) -based single-stock headline advice provided by ICES, including up to $F_{MSY\ upper}$, may jeopardise or delay their recovery and fails to prevent them from falling outside safe biological limits. **This is because the advice is not designed to**

15 *Ibid*., e.g. p. 57, 83, 87.

16 Coalition Clean Baltic submitted an application to the General Court of the European Union (GCEU) to invalidate the EU fisheries ministers' decision on the 2024 fishing quotas for the Baltic herring.
https://www.ccb.se/environmental-organizations-appeal-to-eu-court-to-invalidate-fishing-quotas-due-to-baltic-herring-stocks-collapse

17 BalticWaters (2024). Report: Are EU Fisheries Ministers Breaking the Law?

18 Art. 4.6 of the Baltic Sea Multiannual Plan requires fishing opportunities to be set in such a way that there is less than a 5% probability of the stock's spawning biomass (SSB) falling below critical biomass levels (Blim).

19 Briefing 2 on "Context and legal framework" in the joint TAC Briefing Series (see footnote 13).

20 Coalition Clean Baltic (2024). Environmental organizations appeal to EU court to invalidate fishing quotas due to Baltic herring stocks collapse. 21 August 2024. https://www.ccb.se/environmental-organizations-appeal-to-eu-court-to-invalidate-fishing-quotas-due-to-baltic-herring-stocks-collapse.

21 Fisheries management rules revision – Omnibus

22 For example, the Council agreed for 2026 to increase the central Baltic herring quota by 15% compared to 2025 levels, despite the stock being in poor condition and barely above critical levels. This decision violates the Baltic Sea MAP by creating an unacceptably high risk and exceeding the legal 5% probability limit of falling to critically low levels that could impair the population's reproduction. See more here: https://www.ccb.se/fisheries-ministers-risk-breaking-eu-law-jeopardising-baltic-sea-recovery

rebuild stocks within any concrete timeframe, let alone in the near future, nor to prevent unsustainable stock declines.[23]

The Commission itself recognised in its recent CFP evaluation report that "*the use of FMSY as the main target for achieving MSY has not led so far to the expected rebuilding of stocks especially those suffering declining productivity in the context of growing uncertainties on the effects of climate change on fish stocks*", and that "*the assumption that FMSY would rapidly restore biomass has not fully materialised*".[24] This highlights that - while the MSY framework remains relevant as a backstop for achieving "*environmental results that contribute to viable socio-economic performance*"[25] - more, not less caution, is urgently needed: this means lower fishing mortality levels (with F_{MSY} point value as an upper limit) that are geared towards delivering timely recovery above healthy and productive biomass levels (with B_{MSY} as a lower threshold to exceed).

Moreover, a study in the journal *Science* (Edgar et al. 2024[26]) shows that fisheries management projections have been overly optimistic and that there is substantial uncertainty in modeled stock estimates, particularly for already overfished stocks. This well-documented concern that stock conditions are worse than previously reported[27] highlights the urgent need for more precautionary fisheries management to mitigate the risks from overly optimistic stock assessments. The uncertainty with these models is further exacerbated in the Baltic Sea by the current geopolitical situation, as only limited data on catches by the Russian Federation are available.

The current ICES advice on fishing opportunities - and the requests (by fishery managers like the European Commission) that guide the provision of such advice - do not fully reflect all relevant legal requirements and policy objectives applicable to the EU.

Concretely, they are not geared towards:

1. Recovering fish populations within a concrete timeframe and maintaining them above sustainable levels in the near future;
2. Preventing fish populations from, or minimising the risk of, falling outside safe biological limits, despite legal safeguards in the EU's MAPs, including the Baltic Sea MAP; or

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[23] This is because the current ICES Advice Rule which guides the provision of the advice on fishing opportunities merely decreases the advised fishing mortality below F_{MSY} when a stock falls below MSY $B_{trigger}$, but does not contain a concrete recovery target or timeframe. Alleviating the fishing pressure may of course speed up stock increases or slow down declines, but on its own is not enough to target recovery in the short- or mid-term. For an explanation of the ICES Advice Rule for data-rich stocks, please refer to ICES (2023). Advice on fishing opportunities (2023). General ICES Advice guidelines. Report. https://doi.org/10.17895/ices.advice.22240624.v2, pp. 5-6.

[24] CFP evaluation report, p. 84 and 66.

[25] *Ibid*., p. 84.

[26] Edgar, G. J., Bates, A. E., Krueck, N. C., Baker, S. C., Stuart-Smith, R. D., & Brown, C. J. (2024). Stock assessment models overstate sustainability of the world's fisheries. Science, 385(6711), 860-865. https://www.science.org/doi/10.1126/science.adl6282

[27] Froese, R; Steiner, N; Papaioannou, E; MacNeil, L; Reusch, T B H; Scotti, M (2025). Systemic failure of European fisheries management. Science 388(6749), pp. 826-828. DOI: 10.1126/science.adv4341. May 2025. See figure on p. 827, showing "*examples of previous unrealistic estimates and forecasts made by ICES in 2015 and 2018 to 2021*". *Ibid*. Referencing cod and herring in the Baltic Sea, this study also refers to the scientific advice as "*incomplete, risk-prone and biased*" and states that scientists from the national fisheries research institutes who are involved in the development of the ICES advice "*were aware of the regular overprediction of latest biomass in ICES assessments and the need to correct these downward in the subsequent years*".

3. Delivering on all relevant elements of "Good Environmental Status" (GES) under the Marine Strategy Framework Directive (MSFD), such as healthy population structures and/or food web integrity (e.g. leaving enough food in the sea for other marine life).

This problem is explained in more depth in Briefing 3[28] - which was co-signed by almost 30 organisations including environmental NGOs, recreational fisheries, fishing rights owners and the Low Impact Fishers of Europe - of our joint TAC Briefing Series and in correspondence with Commissioner Kadis.[29,30,31] We are reassured by the clear statement from Commissioner Kadis regarding the renewal of the agreement between ICES and DG Mare, which guides the provision of scientific advice on fishing opportunities, that his "*services are committed to ensuring that the Grant Agreement incorporates provisions whereby scientific advice is recovery-focused, precautionary, and ecosystem-based*".[32]

EU decision-makers must now urgently work with ICES to recognise and address these fundamental shortcomings in the advisory approach, and apply additional precaution by setting fishing opportunities below the ICES headline advice, until the necessary changes have been made. **Fishing at or above advised MSY-based catch levels will not set the Baltic Sea on a clear path out of the crisis.** We need a management system, underpinned by fully recovery-focused, precautionary and ecosystem-based advice, that goes beyond short-term fishing interests, and instead protects ecosystem functions, fisheries and coastal communities in the long term.[33]

To improve the scientific advice underpinning fishing opportunities, NGOs recommend that the European Commission should:

- Work with ICES and other relevant ICES advice clients to develop and implement a clear roadmap for how current shortcomings[34] will be swiftly addressed and dealt with when setting fishing opportunities.

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[28] Briefing 3 "'Best available' is not good enough - addressing shortcomings in the current scientific advice" in the joint TAC Briefing Series (see footnote 13).

[29] Joint letter to Commissioner Kadis, co-signed by 17 organisations, regarding the renewal of the specific Grant Agreement with ICES. https://www.clientearth.org/latest/documents/letter-to-european-commissioner-kadis-regarding-the-renewal-of-the-specific-grant-agreement-with-ices/. 17 April 2025.

[30] Joint letter to Commissioner Kadis, co-signed by 18 organisations, regarding shortcomings in the scientific advice on fishing opportunities. https://www.clientearth.org/latest/documents/joint-letter-to-european-commissioner-kadis-regarding-shortcomings-in-the-scientific-advice-on-fishing-opportunities/. 9 December 2025.

[31] Letter from the Low Impact Fishers of Europe (LIFE) to Commissioner Kadis, urging him to strengthen the scientific basis of EU fisheries management ahead of ICES agreement renewal. 30 October 2025. https://lifeplatform.eu/life-urges-commissioner-to-strengthen-the-scientific-basis-of-eu-fisheries-management-ahead-of-ices-agreement-renewal/

[32] Response from Commissioner Kadis (6 February 2026) to a joint letter from 9 December 2025, as referred to in footnote 31.

[33] *Ibid.* Froese et al. (2025) concluded that "*it should be understood and accepted that the scientific estimate of the maximum catch that a stock can support given its ecosystem role and environmental conditions is a hard upper limit that is not open for political negotiation or compromise. Instead, political and societal discussions of allowed catch can focus on debating how far TACs shall be set below the scientific limit to account for uncertainty and to maximise resilience, minimize risks, and ensure long-term profitable fisheries*."

[34] An overview of key shortcomings and recommendations how the European Commission, as well as other ICES advice clients, could help to address them, is provided in a recent joint letter to EU Commissioner Kadis (2025), co-signed by 17 organisations. https://www.clientearth.org/latest/documents/letter-to-european-commissioner-kadis-regarding-the-renewal-of-the-specific-grant-agreement-with-ices/. An upcoming briefing series, which will consolidate various cross-cutting concerns and recommendations presented by the NGOs regarding the setting of fishing opportunities, will contain a bespoke briefing on this topic and be shared in due course.

- Work with other relevant decision-makers to agree on ecosystem-based fisheries management objectives to inform the ICES advice request process.[35] International commitments on biodiversity conservation, such as Global Biodiversity Framework Directive, the Baltic Sea Action Plan (BSAP) of the Helsinki Commission (HELCOM), as well as the MSFD should provide a basis for these ecological objectives and be considered alongside the rules and objectives of the CFP.
- Change the requests for ICES advice on fishing opportunities to:

  a) aim for rapid recovery of fish populations, particularly depleted or at-risk stocks, within a concrete timeframe and for maintaining them above sustainable levels in the near future,
  b) prevent or minimise the risk of fish populations falling outside safe biological limits, in line with the legal safeguard in the Baltic MAP to keep the risk of spawning stock biomass falling below B_{lim} below 5%,
  c) fully reflect ecosystem dynamics and needs and multispecies considerations, also delivering on all relevant elements of Good Environmental Status (GES) under the Marine Strategy Framework Directive (MSFD), such as healthy population structures and/or food web integrity (i.e. leaving enough food in the sea for other marine life), in line with an ecosystem-based approach to fisheries management, and
  d) provide sufficiently precautionary alternative catch options where a full incorporation of these aspects is not yet possible, to minimise risks to stocks and the overall ecosystem.

3. NGO recommendations on Baltic Sea fishing opportunities for 2027

We urge the European Commission to propose, and fisheries ministers to adopt, fishing opportunities at levels well below the F_{MSY} point value, where available, to allow for the rapid recovery of Baltic Sea fish populations. This would ensure sufficient precaution, and safeguard long-term population and ecosystem health, resilience and productivity.

This means the following for the setting of Baltic Sea fishing opportunities for 2027:

- Fishing opportunities should be set well below the scientific headline advice provided by ICES, regardless of whether this is based on the ICES MSY approach or the ICES precautionary approach for data-limited stocks.[36]
- For any stocks below MSY $B_{trigger}$, the Commission should deliver on the commitment regarding rebuilding initially made at last year's October Agrifish Council by urgently requesting scientific rebuilding advice from ICES. This rebuilding advice - or, where

[35] The Pew Charitable Trusts. 2024. To Improve Fisheries Management and Protect Ecosystems, Decision Makers Must Ask Better Questions

[36] See Briefings 1, 3 and 5 of the joint TAC Briefing Series for further details.

the necessary work cannot be completed in time, at the very least catch options compatible with different levels of projected short-term stock increases, should be delivered in time to inform this year's TAC negotiations (for example in the form of special request advice). The future rebuilding advice should be published in a form of recurring ICES advice on fishing opportunities.

- TACs must not be set at or above catch levels that are estimated to exceed the legally binding safeguard (a so-called "5% rule"), in Article 4.6 of the Baltic Sea MAP, limiting the risk of the spawning stock falling below B_{lim}. Meanwhile, the Commission's MAP Omnibus must not lead to the weakening or removal of this fundamental safeguard.
- A set precautionary safeguard percentage or amount should be deducted from the headline advice to account for scientific uncertainties, low recruitment trends, inter-species dynamics, mixed fisheries interactions, known and documented misreporting and other pressures. The size of this precautionary safeguard would depend on the population's status.[37] This approach would allow fish populations to fulfil their important role in the food web, benefitting the entire Baltic Sea ecosystem.

NGOs recommend additional management measures to help the recovery of fish populations[38]

- Request ICES advice on fishing closures in areas with high mixing where impacts on individual populations or sub-populations are not well understood in order to protect depleted and vulnerable populations or sub-populations and minimise the risk of genetic depletion.
- Implement spatial management measures, such as closures, in areas with high mixing to protect depleted and vulnerable populations from bycatch.[39]
- Use fishing closures during critical periods, such as during spawning and spawning aggregation seasons.

[37] See Briefing 1 ("Cover Briefing: Key recommendations on setting fishing opportunities" of the joint TAC Briefing Series for further details. This approach could be informed by other catch options in the advice sheet and their associated biomass projections. For example, where no bespoke rebuilding scenario is available, the TAC could be informed by the catch option corresponding to or closest to the mid-point between the biomass increase projected for zero catch and that for FMSY lower or FMSY lower × SSB 2025/MSY Btrigger, or could be set halfway between the corresponding catch options. Generally, the TAC could be set at a maximum at a certain fraction, such as 80% (or another, lower level, depending on the stock situation), of the ICES single-stock headline advice.

[38] Also see the joint TAC Briefing Series for further context and explanations on many of these topics.

[39] The principles behind ICES salmon advice, which Member States support, are a good example of how to use spatial measures to close a mixed stock fishery and only allow fishing close to the spawning river to mitigate risks to individual [weak] stocks or stock components.

- Take the lack of implementation of the Landing Obligation (LO)[40] into account by setting TACs sufficiently below ICES catch advice to ensure illegal, unreported discarding does not result in actual catches exceeding ICES catch advice.[41,42,43]
- Provide transparent calculations for TACs based on the ICES advice on fishing opportunities.
- Develop and implement effective rebuilding plans based on the findings of ICES WKREBUILD2[44] and future rebuilding advice provided by ICES for all populations below MSY $B_{trigger}$.[45] These should be geared towards rapidly rebuilding stocks above biomass levels that can produce MSY (i.e. above B_{MSY}), as required by the CFP, include strong safeguards to prevent future population declines or stagnation below MSY $B_{trigger}$, and be subject to close monitoring and enforcement using Remote Electronic Monitoring (REM).
- Underpin sustainable TAC-setting by robust controls and full catch documentation using REM (supported by observer coverage as appropriate) for all vessels above 12 m and for medium and high-risk vessels below 12 m.

40 COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL Towards more sustainable fishing in the EU: state of play and orientations for 2023.

41 ClientEarth, 2020. Setting Total Allowable Catches (TACs) in the context of the Landing Obligation. July 2020. Also see this short presentation (starting at 15:30) which visualises the risk that "topped up" catch-based TACs pose in combination with illegal discards: https://youtu.be/Cw783NtRdCg?t=930.

42 Borges, L., 2020. The unintended impact of the European discard ban. ICES Journal of Marine Science, *ICES Journal of Marine Science*, Volume 78, Issue 1: 134-141, https://doi.org/10.1093/icesjms/fsaa200

43 See Briefing 6 on "Mixed fisheries considerations" and Briefing 8 "Landing obligation challenges" of the joint TAC Briefing Series.

44 ICES (2023). Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks (WKREBUILD2). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.24763293.v2

45 See Briefing 9 on "Depleted stocks with zero or very low catch advice" of the joint TAC Briefing Series for further details.

SUMMARY OF NGO RECOMMENDATIONS ON BALTIC SEA TACS AND ADDITIONAL MEASURES FOR 2027

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
Eastern Baltic cod **(SDs 25-32)[47]**	430 t (bycatch only)	Precautionary Approach	0 t	ICES cannot assess the stock and exploitation status relative to maximum sustainable yield (MSY) and precautionary approach (PA) reference points because the reference points are undefined	n/a[48]	**0 t** - Take urgent steps to request advice on a rebuilding plan from ICES to ensure rapid recovery above B_{MSY}, and take urgent steps towards this ahead of this year's negotiations. - Implement habitat restoration efforts, focused on marine habitats restoration and improving bottom oxygen content, as advised by ICES[49], as such efforts are expected to have direct effects on condition, maturity, and mortality, as well as indirect effects on biomass. - Ensure that fisheries using "bycatch TACs" are fully documented using REM (supported by observer coverage as appropriate), and strong remedial

[46] For Baltic and Gulf of Finland salmon, we have interpreted ICES advice as the 'Commercial Landings' (the reported projected landings) of individual fish. This is the 'Total Commercial Sea Catch' with deductions for the unreported, misreported (i.e., IUU) and unwanted catch (i.e. seal damage and discards), as estimated by ICES.

[47] ICES. 2026. Cod (Gadus morhua) in subdivisions 24-32, eastern Baltic stock (eastern Baltic Sea). https://doi.org/10.17895/ices.advice.30932015

[48] Deduct Russian share from the advice for eastern Baltic cod. Deduct catches of eastern Baltic cod in SD 24 (i.e., those caught in the western Baltic cod TAC area). Not applicable with zero catch advice.

[49] ICES. 2026. Cod (Gadus morhua) in subdivisions 24–32, eastern Baltic stock (eastern Baltic Sea). https://doi.org/10.17895/ices.advice.30932015

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						measures are in place. This is particularly crucial in light of long-standing concerns about the lack of compliance with the landing obligation - Boost food availability for cod by setting the TACs for key forage fish species (sprat and herring) well below the single-stock headline advice for those stocks. - Request scientific advice on the changed spawning period. - Continue with recreational measures (recreational fishing ban) agreed for 2026.[50]
Western Baltic cod **(SDs 22-24)[51]**	266 t (bycatch only)	Precautionary Approach	0 t	Spawning-stock size is below MSY $B_{trigger}$, BPA, and Blim. No reference points for fishing pressure have been defined for this stock.	n/a	**0 t** - Take urgent steps to request advice on a rebuilding plan from ICES to ensure rapid recovery above B_{MSY}, and take urgent steps towards this ahead of this year's negotiations. - Implement habitat restoration efforts, focused on marine habitat restoration and the reduction of

[50] Council Regulation (EU) 2025/2454 of 1 December 2025 fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2026 and amending Regulation (EU) 2025/202 as regards certain fishing opportunities in other waters https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32025R2454

[51] ICES (2025). Cod (Gadus morhua) in subdivisions 22-24, western Baltic stock (western Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202560.v2

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						eutrophication to improve bottom oxygen content, as advised by ICES.[52] - Ensure that fisheries using "bycatch TACs" are fully documented using REM (supported by observer coverage as appropriate), and strong remedial measures are in place. This is particularly crucial in light of long-standing concerns about the lack of compliance with the landing obligation - Set the plaice TAC well below the respective single-stock headline advice in order to prioritise cod protection and recovery. - Introduce trawl-free areas in essential cod habitats and spawning areas. - Boost food availability for cod by setting the TACs for key forage fish species (sprat and herring) well below the single-stock headline advice for those stocks. - Continue with recreational measures (recreational fishing ban) agreed for 2026[53] .

[52] *Ibid*. https://doi.org/10.17895/ices.advice.27202560

[53] Council Regulation (EU) 2025/2454 of 1 December 2025 fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2026 and amending Regulation (EU) 2025/202 as regards certain fishing opportunities in other waters https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32025R2454

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
Western Baltic herring **(SDs 20-24)[54]**	788 t (bycatch only)	MSY Approach and Precautionary Approach	0 t	Fishing pressure on the stock is below FMSY; spawning-stock size is below MSY $B_{trigger}$, BPA, and Blim.	n/a	**0 t** - Take urgent steps to request advice on a rebuilding plan from ICES to ensure rapid recovery above B_{MSY}, and take urgent steps towards this ahead of this year's negotiations. - Implement additional measures to protect and restore known spawning habitats and nursery areas, as advised by ICES.[55] - Consider implementing additional area and/or time restrictions on the herring fishery in the eastern parts of the North Sea divisions 4a, 4b and in division 3a based on scientific advice, as catches of Western Baltic Spring Spawning herring in the fishery for North Sea herring will be inevitable.[56] - Request ICES advice on possible temporal and spatial management measures, in order to avoid bycatch of

[54] ICES. 2026. Herring (Clupea harengus) in subdivisions 20-24, spring spawners (Skagerrak, Kattegat, and western Baltic). https://doi.org/10.17895/ices.advice.32133847

[55] "*ICES advises that measures to protect and restore known spawning habitats and nursery areas are needed*" ICES Advice 2026 – her.27.20-24– https://doi.org/10.17895/ices.advice.32133847

[56] ICES. 2026. Herring (Clupea harengus) in subdivisions 20-24, spring spawners (Skagerrak, Kattegat, and western Baltic). https://doi.org/10.17895/ices.advice.32133847

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						WBSS herring and secure a reduction of unwanted fishing pressure on this stock.
Central Baltic herring (SD 25-27, 28.2, 29 and 32)[57]	96,463 t (15 % increase)	EU MAP (F_{MSY})	Up to FMSY: 269 633 t Taking into account stock mixing	Fishing pressure on the stock is below FMSY, and spawning-stock size is below MSY $B_{trigger}$ and between BPA and Blim.	Add 467 t for Gulf of Riga herring to be taken in SD 28.2 and deduct 5 156 t for Central Baltic herring to be taken in the Gulf of Riga (SD 28.1)[58] Deduct 9,5% Russian share.	**Do not increase fishing mortality from 2026, based on catch scenario: F no higher than F= F_{2026} of 164 143 t**. Taking into account stocks mixing and third country share, this would mean a corresponding **TAC in the central Baltic management area of ≤ 144 396 t.** TAC based on **F= F_{2026}** catch scenario will increase the chances of SSB returning to above MSY $B_{trigger}$[59] and account for the important role of this species in the food web. Fishing at FMSY lower still means that the probability of SSB being *below* $B_{trigger}$ in 2028 is 31%, and F=F_{2026} represents the lowest-risk non-zero catch option, with a 28% probability of the stock remaining below MSY $B_{trigger}$.

[57] ICES (2026). Herring (Clupea harengus) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932081.v1

[58] In the latest advice, ICES accounts for mixing between Central Baltic and Riga herring . The corresponding TAC in the central Baltic management area for 2027 would be calculated as: 274 322 tonnes + 467 tonnes − 5 156 tonnes = 269 633 tonnes pp. 4 https://doi.org/10.17895/ices.advice.30932081.v1

[59] ICES (2026). Herring (Clupea harengus) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932081.v1

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						Additional recommended actions: - In its headline advice, ICES notes that the fishery for central Baltic herring includes fish from Gulf of Riga herring. This should be taken into account when defining management actions to avoid exceeding the advice for any of the stocks. - Consider ICES advice that no activities on spawning habitats should be allowed unless the effects of these activities have been assessed and shown not to be detrimental - Because the population is below MSY Btrigger, take urgent steps to request ICES advice on a rebuilding plan to ensure rapid recovery above B_{MSY}, and take urgent steps towards this ahead of this year's negotiations. - Develop a rebuilding plan to ensure rapid recovery above B_{MSY}, for instance based on the findings of ICES WKREBUILD2,[60] including rebuilding a healthy age-size structure of the stock.

[60] ICES (2023). Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks (WKREBUILD2). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.24763293.v2

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						- Request ICES to provide management measures to protect the genetically vulnerable sub-populations. - Improve control, enforcement, onboard monitoring and sampling of landings to ensure that the misreporting of sprat as herring and other types of misreporting do not occur. - Reserve the TAC exclusively for low-impact coastal fishers
Gulf of Riga herring **(SD 28.1)**[61]	34,367 t (-17%)	EU MAP (F_{MSY})	F-range: 30521t and 43385t FMSY: 38 183t. All values account for stock mixing.	Fishing pressure on the stock is below F_{MSY}, and spawning-stock size is above MSY $B_{trigger}$, B_{pa}, and B_{lim}.	Stock mixing with central Baltic herring is accounted for in advice. Deduct 467 t for Gulf of Riga herring to be taken in SD 28.2 and add	**≤ FMSY lower 30 521t [63] .** The recommendation is based on catch scenario FMSY lower = 25 832 t and takes account of stock mixing. - Set the TAC within or below the lower end of the F_{MSY} range taking into account: - decreasing spawning stock biomass trend - important role of this species in the food web

[61] ICES (2026). Herring (Clupea harengus) in Subdivision 28.1 (Gulf of Riga). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932084.v1

[63] Calculated based on F_{lower} (25 832t), and taking into account mixing by deducting 467t for Gulf of Riga herring to be taken in SD 28.2 and adding 5 156 t for Central Baltic herring taken in the Gulf of Riga = 30 521 t.

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
					5156t for Central Baltic herring to be taken in the Gulf of Riga (SD 28.1).[62]	- the need for building Baltic Sea ecosystem resilience by allowing the stock biomass to increase.
Gulf of Bothnia herring **(SDs 30-31)[64]**	39,108 t* (-41%) * May only be fished from 1 January to 31 October 2026	EU MAP (F_{MSY})	Up to 90 391 t	Fishing pressure on the stock is below F_{MSY}, and spawning-stock size is <u>below</u> MSY $B_{trigger}$ but above B_{pa} and B_{lim}.	n/a	**≤ SSB (2028) = MSY $B_{trigger}$ 45 544 t** Note that even F_{lower} × SSB(2027)/MSY $B_{trigger}$ catch option is associated with a 62% probability that the stock remains *below* MSY $B_{trigger}$ in 2028. In line with ensuring a "*rapid return*" of the stock "*to levels above those capable of producing the MSY*" as per the safeguard in Article 5(1) of the Baltic Sea MAP[65], the TAC should be set in line with the lowest possible probability of SSB < MSY $B_{trigger}$ in the following year. Catch scenario SSB (2028) = MSY $B_{trigger}$ with associated

[62] In the latest advice, ICES accounts for mixing between Central Baltic and Riga herring stating "The assessment and the advice take account of the entire Gulf of Riga herring stock, both the part caught in the Gulf of Riga and the part caught outside of it. A mixture of central Baltic herring (subdivisions 25–27, 28.2, 29, and 32) and Gulf of Riga herring (subdivision 28.1) is caught in the Gulf of Riga. The proportion of central Baltic herring caught in the Gulf of Riga management area has increased in 2024 and 2025, while the proportion of the Gulf of Riga herring caught in the central Baltic management area has decreased, leading to changes in the stock mixing assumptions.

[64] ICES (2026). Herring (Clupea harengus) in Subdivisions 30 and 31 (Gulf of Bothnia). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932087.v1

[65] Art.5 (1) of Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02016R1139-20240710

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						50% risk of the stock still being *below* MSY $B_{trigger}$ in 2028 is the lowest risk among all non-zero catch options presented in the advice sheet. In addition the decision on TAC should take into account important indications from ICES advice that: "For the stock to increase to MSY $B_{trigger}$ in 2028, fishing mortality in 2027 would need to be at least 54% lower than FMSY[66]". **Additional Recommended actions:** - Further research is needed, e.g. on the role of Bothnian herring as part of the Baltic Sea food web. Size, species composition and location of available zooplankton could affect both size and condition of Gulf of Bothnia herring.[67] - Consider setting TACs and implementing measures that increase the share of older fish in the stock, in line with MSFD descriptor (D3C3), which over the past decade has been very low. At the current target

66 ICES (2026). Herring (Clupea harengus) in Subdivisions 30 and 31 (Gulf of Bothnia). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932087.v1

67 ICES. 2024. Workshop on establishing a roadmap for possible conservation measures for herring in the Baltic (WKHERBAL). ICES Scientific Reports. 6:14. 46 pp. https://doi.org/10.17895/ices.pub.25310959

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						fishing mortality rate, it is unlikely that the proportion of older individuals will increase, according to ICES.[68] - Request scientific advice on dividing the Gulf of Bothnia herring stock into two separately managed herring populations; for the northern and southern populations .
Baltic sprat **(SDs 22-32)[69]**	201,975 t (+45%)	EU MAP (F_{MSY})	253,819 – 332,885 t (F_{MSY}: 324,277 t)	Fishing pressure on the stock is at F_{MSY} and below F_{PA}. Spawning-stock size is above MSY $B_{trigger}$, B_{PA}, and B_{lim}.	Deduct 10,08% Russian share	**≤ FMSY lower 228 234 t.** The recommendation takes into account third country share**.** The TAC should be set below the lower end of the F_{MSY} range due to the mixing with the degraded herring stocks in the central Baltic, ongoing issues with misreporting and to account for the important role of this species in the food web, particularly for cod. **Additional recommended actions:** - Implement spatial management and measures to account for species interaction (such as spatial or temporal limitations).

[68] ICES (2026). Herring (Clupea harengus) in Subdivisions 30 and 31 (Gulf of Bothnia). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932087.v1

[69] ICES. 2026. Sprat (Sprattus sprattus) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22–32. https://doi.org/10.17895/ices.advice.30932426

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						- Increase control, enforcement, onboard monitoring and sampling of landings to ensure that the widespread misreporting of herring and sprat[70] does not continue.
Plaice **(SDs 22-32)**[71]	10,973 t (-3%)	MSY approach	11 237 t for SDs 22–32	Fishing pressure on the stock is below F_{MSY}, and spawning-stock size is above MSY $B_{trigger}$, B_{pa}, and B_{lim} but condition and weight-at-age declining	Apply the same method as detailed in the ICES advice table 5.[72]	**Do not increase fishing mortality from 2025, based on catch scenario (F no higher than F= F_{2025} of 2742 t.)** This would mean a corresponding **TAC in the management area SD22 - 32 of ≤ 1593 t.** **Prioritise protection and recovery of both Baltic cod stocks by setting the plaice TAC well below the**

[70] In their latest advice, ICES notes that the "*Species misreporting of herring and sprat continues to be an ongoing problem. The effects of this have been partially quantified and included in the assessment where possible. Since misreporting has only been partly included in the assessment, it still contributes to uncertainty in the assessment and advice".* ICES (2026). Sprat (Sprattus sprattus) in subdivisions 22-32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932426.v1

[71] ICES. 2026. Plaice (Pleuronectes platessa) in subdivisions 21–32 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, ple.27.21–32. https://doi.org/10.17895/ices.advice.30932261

[72] *Table 5 pp 4* ICES. 2026. Plaice (Pleuronectes platessa) in subdivisions 21–32 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, ple.27.21–32. https://doi.org/10.17895/ices.advice.30932261

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						single-stock headline advice and in no event allowing for the fishing level to increase. **Additional recommended actions:** - Take into account that ICES advises that for European plaice in the Kattegat and Baltic Sea, management should be considered within the context of a degraded ecosystem resulting from cumulative anthropogenic pressures and climate change. Habitat restoration efforts with a focus on improving bottom oxygen content are recommended. These are expected to have indirect effects on individual condition and natural mortality.[73] - Request ICES to provide advice on relevant mixed fisheries considerations to ensure future plaice TAC-setting does not jeopardise the recovery of depleted cod stocks. - Consider a spatial closure for vessels operating with bottom towed gear in SDs 22, 24, 25 and 26 where

[73] See Non-fisheries conservation considerations in ICES. 2026. Plaice (Pleuronectes platessa) in subdivisions 21-32 (Kattegat and Baltic Sea). Plaice (Pleuronectes platessa) in subdivisions 21–32 (Kattegat, Belt Seas, and the Sound). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, ple.27.21–32. https://doi.org/10.17895/ices.advice.30932261

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						eastern Baltic cod is most abundant to avoid bycatch.[74] - Ensure that fisheries using "bycatch TACs" are fully documented using REM (supported by observer coverage as appropriate), and strong remedial measures are in place. This is particularly crucial in light of long-standing concerns about the lack of compliance with the landing obligation - The new roof-less fishing gear introduced by a Commission Delegated Regulation 2024/3093[75] should be used to avoid cod bycatch in the flatfish fisheries,[76,77] and access to the plaice TAC must be conditional on the use of such gear. - Consider substantial and consecutive decreases in stock weight-at-age and condition which have been observed alongside the high catches of plaice below

[74] ICES, 2020. Report on eastern Baltic cod bycatch in non-targeted fisheries, mixing with western Baltic cod in SD24, and stock situation in SDs 27-32 (Ad hoc). ICES Scientific Reports. 1:76. 69 pp

[75] Commission Delegated Regulation (EU) 2024/3093 of 13 October 2022 amending Regulation (EU) 2019/1241 of the European Parliament and of the Council as regards specific technical measures to reduce bycatches of cod in the Baltic Sea https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202403093

[76] ICES, 2019. EU request for further information on the distribution and unavoidable bycatches of eastern Baltic cod. In Report of the ICES Advisory Committee, 2019. ICES Advice 2019, sr.2019.24.

[77] ICES, 2020. Report on eastern Baltic cod bycatch in non-targeted fisheries, mixing with western Baltic cod in SD24, and stock situation in SDs 27-32 (Ad hoc). ICES Scientific Reports. 1:76. 69 pp.

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
						minimum size in demersal fisheries and the increased discarding of plaice.
Main Basin salmon 22-31[78]	25,537 specimens (bycatch only) (-27%)	MSY approach	Same advice for 2027 as for 2026: 0 for mixed stock fisheries at sea 0 for wild salmon in weak rivers in AU 5 If spatial and seasonal		Deduct Russian catch	**We recommend that there should be no targeted salmon fishery in 2027 unless the new assessment shows that this year's spawner numbers exceed the levels required to produce MSY** - Fishing should only take place on compensatory released salmon or salmon from rivers where stocks are at full reproductive capacity. If ICES advice on catches is adopted for SDs 29N-31, the start of the fishing season should be delayed until 1 July to protect weak stocks. - Mixed-stock fisheries present particular threats and should not be allowed. - Measures should be adopted that allow salmon fisheries, both at sea and in rivers, to be adaptively managed during the fishing season. If the achievement of spawning stock targets is at risk due to low returns, then measures such

[78] ICES (2026). Salmon (*Salmo salar*) in subdivisions 22-31 (Baltic Sea, excluding the Gulf of Finland). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932375.v1

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
			management is used, then ≤ 30,000 salmon can be taken in 29N-31 (both commercial and recreational)			as fisheries closures should be deployed immediately. Rapidly adaptive regulatory safeguards should be critically important tools in preventing the collapse of salmon stocks. - As there are substantial uncertainties regarding the level of salmon caught in fisheries targeting other species, such as the pelagic trawl fishery for herring and sprat and the coastal fishery for whitefish, we call on ICES and the Member States to improve data collection on bycatch[79]. - The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

[79] ICES. 2025a. Baltic Salmon and Trout Assessment Working Group (WGBAST). ICES Scientific Reports. 7:50. 378 pp. https://doi.org/10.17895/ices.pub.29118545

TAC by area - species	TAC set for 2026 (% increase from 2025)	ICES advice basis	ICES stock catch advice for 2027 (tonnes)[46]	Stock Status from ICES advice sheets	ICES advice adjusted for - Third Country shares - Stock & TAC area mixing	NGO recommendations on TACs and additional measures for 2027
Gulf of Finland salmon **(SD 32)**[80]	10,232 specimens (+1%)	Precautionary Approach	Same advice for 2027 as for 2026 10 480 reared salmon		Apply the 86% of reported landings[81] Deduct Russian share	**≤ 10 480 reared salmon** - No wild salmon should be targeted in the Gulf of Finland (GoF). To avoid wild salmon from the Gulf of Bothnia stocks, the start of the fishing season should be postponed. Salmon in the GoF can be targeted only by fishing gear that is proven to do no harm to released wild salmon bycatch. - Measures should be adopted that allow salmon fisheries, both at sea and in rivers, to be adaptively managed during the fishing season. If the achievement of spawning stock targets is at risk due to low returns, then measures such as fisheries closures should be deployed immediately. Rapidly adaptive regulatory safeguards should be critically important tools in preventing the collapse of salmon stocks. - The current approach of setting TACs on an annual basis and including technical measures in the TAC Regulation does not deliver sustainable long-term management of the stocks. Therefore, a holistic

[80] ICES (2026). Salmon (Salmo salar) in Subdivision 32 (Gulf of Finland). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932378.v1

[81] ICES (2026). Salmon (Salmo salar) in Subdivision 32 (Gulf of Finland). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.30932378.v1

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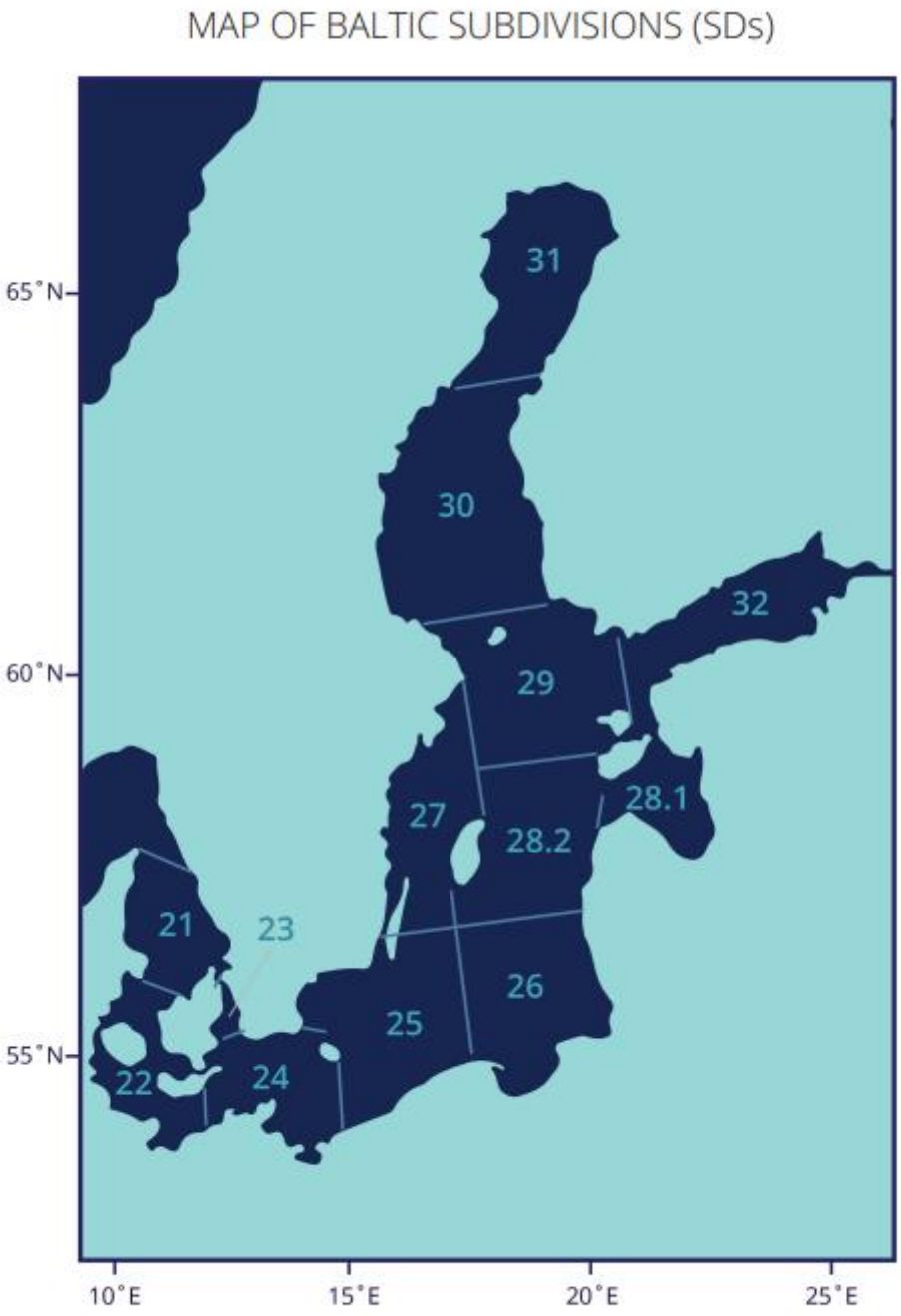
						management approach, covering TAC-setting as well as relevant technical measures, should be developed as part of a comprehensive new multiannual management plan.

Note: Pending a formal sharing agreement between the EU and Russia, the assumed Russian shares are those used under the former International Baltic Sea Fisheries Commission (IBSFC).

MAP OF BALTIC SUBDIVISIONS (SDS)



Map of the Baltic Sea showing the subdivisions of the Belt, the Sound, and the Baltic for the reporting of catch statistics.

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