European Parliament

Evaluation of the Baltic Sea Multiannual Plan Regulation

European Implementation Assessment

STUDY

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Evaluation of the Baltic Sea Multiannual Plan for Fisheries Regulation

European implementation assessment

This European implementation assessment of Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks aims to inform the ongoing work of the European Parliament's Committee on Fisheries (PECH) on an own-initiative implementation report, 'The multiannual plan for the Baltic Sea and ways forward' (2024/2127(INI)).

The assessment is composed of two parts. The first part is an introduction by the European Parliamentary Research Service that provides essential historical and institutional background to the Baltic Sea multiannual plan and sets out the scope and the limitations of the attached evaluation study for clarity on the weight and bearing of the findings and recommendations.

The second part is an evaluation study undertaken by a team of external experts that covers all Member States concerned over the 2016 to 2025 period. Based on interviews and desk research, it provides up-to-date and original sources on the status of the regulation's implementation over the past decade, allowing an evidence-based assessment of the effectiveness, efficiency, relevance, coherence and EU added value of the Baltic Sea multiannual plan. It also offers recommendations for making the current system work better and for possible legal revisions.

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PART I. IN-HOUSE INTRODUCTORY ANALYSIS

Executive summary

About this European implementation assessment

The attached study, together with this introductory section, are part of the European implementation assessments series produced by the European Parliamentary Research Service (EPRS). These European implementation assessments are made available to committees that work on implementation reports as part of the European Parliament's commitment to the Better Regulation agenda and notably its' 'evaluate first' principle.

About the evaluation study in Part II

The evaluation study on the Baltic Sea multiannual plan (MAP) for fisheries was commissioned by EPRS to inform the work of the Committee on Fisheries (PECH) on the own-initiative implementation report 'The multiannual plan for the Baltic Sea and ways forward' (2024/2127(INI)).

It is the first overall evaluation of the Baltic Sea MAP Regulation and is based on desk research and interviews with stakeholders across the Baltic region undertaken in the first half of 2025. The study finds mixed results. Although the MAP helped reduce fishing pressure and improved alignment of the total allowable catch with scientific advice, it has not succeeded in restoring key stocks above sustainable biomass levels. Challenges include inconsistent application of the precautionary approach and insufficient integration of ecosystem considerations. Enforcement of the landing obligation also remains weak. Socioeconomic impacts, particularly on small-scale coastal fleets, have been severe. The study concludes that more ecosystem-based and precautionary management is necessary, together with enhanced regional cooperation and stronger safeguards, to achieve good environmental status and rebuild fish stocks. Recommendations focus on clarifying regulatory ambiguities, enhancing regional cooperation and local stakeholder engagement, operationalising ecosystem-based management, strengthening the scientific basis and aligning fishing opportunities with scientific advice, reinforcing monitoring and data collection, and fostering cross-policy coherence – all in view of supporting the future improvement or revision of the Baltic Sea MAP.

About the introductory section in Part I

The introductory section accompanies the evaluation study by providing background elements designed to help understand what existed before the MAP and what the MAP changed. It also explains the objectives and limits of this evaluation exercise.

It starts by revisiting the origins of multiannual plans. It shows that there was a long build-up towards the Baltic Sea MAP, with attempts to frame its expected contents through technical and scientific recommendations, Council conclusions, interinstitutional agreements, and – most importantly – through the 2013 Common Fisheries Policy (CFP) Basic Regulation. Nevertheless, essential elements of today's Baltic Sea MAP Regulation resulted from interinstitutional (trilogue) negotiations and reflect compromises and the balance of powers there.

The introductory section then summarises the institutional aspects of the Baltic Sea MAP Regulation since it entered into force in 2016. The European Commission issued two implementation reports on the MAP, in 2020 and in 2024. The European Parliament and PECH committee Members have also been committed to the monitoring and evaluation of the MAP and of fisheries in the Baltic. A public hearing was organised in 2023, and at the end of 2024 an own-initiative implementation report, 'The multiannual plan for the Baltic Sea and ways forward' (2024/2127(INI)), was launched.

Having recalled the origins of the MAP and the context of the PECH committee's above-mentioned own-initiative implementation report, this section further outlines both the scope and the limitations of the evaluation study for clarity on the weight and bearing of the findings and recommendations.

1. Introduction

The Baltic Sea multiannual plan (MAP) is a fisheries management plan based on a regulation adopted in 2016, which in this paper is referred to as Baltic Sea Multiannual Plan for Fisheries Regulation, Baltic Sea Multiannual Plan Regulation or Baltic Sea MAP Regulation.[1] It was the first of a kind, a blueprint for regionalisation and a rulebook for annual Council decisions on allowed catches that consider the latest science, interspecies dynamics, and predictability for the sector.

After nine years of implementation of the MAP in the Baltic, there is enough experience and evidence for its evaluation and a reflection on the future. After a first report in 2020, in September 2024 the European Commission issued its second implementation report on the Baltic Sea MAP, continuing to consider it a helpful tool for implementing the common fisheries policy (CFP).[2] At the end of 2024, the **PECH committee, keen to form its own political assessment of the MAP implementation, launched an own-initiative implementation report, 'The multiannual plan for the Baltic Sea and ways forward' (2024/2127(INI))**.

As part of its commitment to the Better Regulation agenda and notably its' 'evaluate first' principle, the European Parliament, with the help of its European Parliamentary Research Service (EPRS), offers committees that launch implementation reports the possibility to benefit from **European implementation assessments**. These are research products that gather implementation evidence to inform the committees' political work.

This European implementation assessment on the Baltic Sea MAP is composed of two parts.

- Part II, an evaluation study undertaken on behalf of EPRS by a team of external experts, covers the Member States concerned over the 2016 to 2025 period. It combines interviews undertaken in the first half of 2025 and desk research. It provides the PECH committee with up-to-date and original sources on the status of the regulation's implementation. It also offers recommendations for making the current system work better and for possible legal revisions.
- Part I, written by EPRS, serves as an introduction to the evaluation study. It looks back at the origins of the current Baltic Sea MAP as the CFP has been encouraging multiannual management plans since the 1990s. It explains the developments leading up to the 2016 adoption of the Baltic Sea MAP to better understand what the MAP is and how it was intended to innovate, as awareness thereof allows for a more focused and in-depth read of the study. Finally, it summarises institutional developments in the implementation of the MAP, such as revisions that have taken place and compliance with reporting obligations, all important context elements that have led to the current evaluation exercise.

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1 Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks.

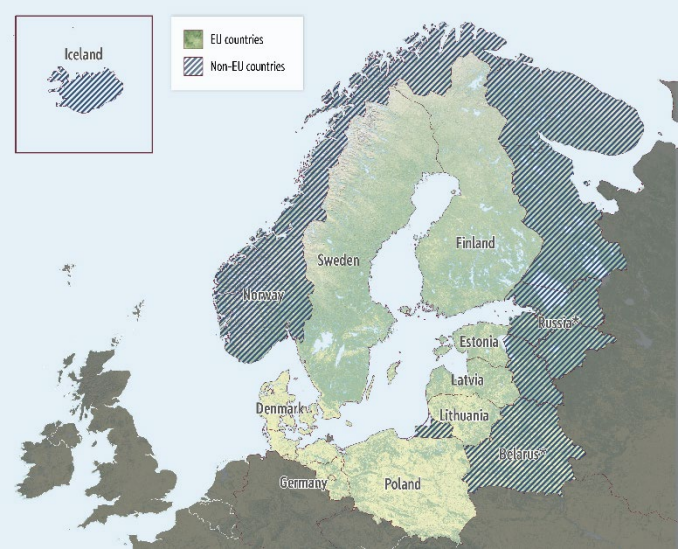
2 European Commission, second report on the implementation of the multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, COM(2024) 703, 2024. See also the first report of 2020 (COM(2020) 494).

2. Context of the evaluation study

The 2016 Baltic Sea MAP is often referred to as the first EU multiannual plan to manage fisheries in a regional sea basin. However, it would be more appropriately called the first multi-species management plan. The adoption of the MAP proved difficult, with the European Parliament and the Council on very different positions. After almost a decade of implementation and monitoring, an evaluation is now possible in the context of the ongoing CFP evaluation by the Commission[3] and the discussions on financing the CFP under the next multiannual financial framework (MFF).[4]

2.1. Current status of the Baltic Sea

Figure 1 – Baltic Sea region



Source: EPRS; graphic by Samy Chahri.

The Baltic Sea region covers around one third of the EU in size and 17.9 % of its population.[5] It hosts a shallow sea, with waters that are mostly isolated from other seas and oceans, making it a unique environment rich in endemic species. Its ecological situation has degraded over the past decades and is now facing major environmental challenges, such as warming of the sea, decreasing levels of salinity, eutrophication (excessive inputs of nutrients coming mainly from agriculture and wastewater, although levels of inputs have recently decreased) and invasive species.

These environmental challenges, combined with increased uses of the sea for transport, fishing and windfarms, among other things, affect the living and spawning areas of fish and **negatively impact**

[3] See the CFP evaluation page on the Commission's public consultation portal.

[4] On 16 July 2025, the Commission proposed bringing together cohesion policy, the common agricultural policy and the CFP under a single programming approach for the next 2028–2035 MFF.

[5] E. D'Ambrogio, An EU Strategy for the Baltic Sea Region (EUSBSR), EPRS, European Parliament, 2022.

the biomass situation of certain commercial fish stocks, as illustrated by the collapse of cod populations, whose targeted fishing has been halted since mid-2019.[6]

2.2. History of the current MAP Regulation

2.2.1. Pre-Baltic Sea MAP situation

The concept of long-term management or recovery plans pre-dates the Baltic Sea MAP. The 1992 CFP reform said that the Council 'may establish management objectives, on a multiannual basis, for each fishery or group of fisheries in relation to the specific nature of the resources concerned. Where appropriate these shall be established on a multi-species basis'.[7]

The 2002 CFP reform[8] made '**multiannual recovery plans**' for stocks outside of safe biological limits mandatory, and it includes a dedicated Article 6 on '**management plans**' for other stocks, which the Council 'shall adopt … as far as necessary to maintain stocks within safe biological limits'. These plans 'shall be multi-annual' and 'may cover either fisheries for single stocks or fisheries exploiting a mixture of stocks, and shall take due account of interactions between stocks and fisheries'.[9]

In 2007, this led to the adoption by the Council of **a multiannual plan for cod stocks in the Baltic Sea and the fisheries exploiting those stocks**.[10] The objective was to ensure that Baltic cod stocks can be exploited under sustainable economic, environmental and social conditions.

The situation for the commercial fish stocks prior to the 2016 Baltic Sea MAP is summarised in Table 1 below.

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6 For further reading on the status of the Baltic Sea, see:
- C. Möllmann, The multiannual plan for the Baltic Sea – A change in management needed, Policy Department for Regional Development, Agriculture and Fisheries, European Parliament, August 2025. This background analysis on the status of the stocks was commissioned for PECH in support of the implementation report 'The multiannual plan for the Baltic Sea and ways forward', in parallel and in coordination with this evaluation study of the regulation.
- International Council for the Exploration of the Sea (ICES), Baltic sea ecosystem overview, 2024.
- A. Altmayer, Baltic Sea fishing area: Current challenges, EPRS, European Parliament, January 2025.
- Section 2.1 of the attached evaluation study.
- HELCOM, State of the Baltic Sea – Third HELCOM holistic assessment 2016-2021, 2023.

7 Article 8, Council Regulation (EEC) No 3760/92 establishing a Community system for fisheries and aquaculture.

7 Council Regulation (EC) No 2371/2002 on the conservation and sustainable exploitation of fisheries resources under the Common Fisheries Policy. The 2002 CFP reform also already promoted the concept of regionalisation of the CFP, which led to the creation of regional advisory councils, and, in 2006, to what would become the Baltic Sea Advisory Council (BSAC), an organisation that seeks to represent a wide variety of parties interested in Baltic Sea fisheries.

8 See also I. Popescu, The common fisheries policy: origins and development, European Parliament, April 2025, and J. Weissenberger, Multiannual plan for Baltic fisheries, EPRS, European Parliament, 2016.

9 Council Regulation (EC) No 1098/2007 establishing a multiannual plan for the cod stocks in the Baltic Sea.

Table 1 – Management of fish stocks before the Baltic Sea MAP

Cod (two stocks – Eastern and Western Baltic)	**Herring (five stocks in the Baltic) and sprat (one stock)**
• Multiannual management plan (with specific mortality rates as overall objective and rules for fixing annual TACs) • Annual TAC decisions (taken 'according to scientific evaluation' by the Scientific, Technical and Economic Committee for Fisheries (STECF) and rules on annual variations, see Article 6) • Restrictions (seasonal/geographic fishing restrictions) • Technical measures (e.g. mesh size)	• Annual TAC decisions • Restrictions (seasonal/geographic fishing restrictions) • Technical measures (e.g. mesh size)

Source: Compiled by the author.

Thus, for the stocks not under a management plan, total allowable catches (TACs) for the following years were decided through annual negotiations bringing compromises between scientific advice and economic interests. For those stocks under a management plan, the European Commission noted in 2014 that 'long-term management plans, established under the CFP since 2002, have shown to be very valuable for the sustainable management of fishery resources. By establishing rules for the annual setting of TACs and other associated management measures, they provide stability and predictability while ensuring that fish stocks are exploited within the agreed limits'.[11]

After 2009, several Commission proposals for multiannual plans failed to progress owing to differing interpretations of Article 43 of the Treaty on the Functioning of the EU (TFEU) by the two co-legislators. With the Lisbon Treaty coming into effect in December 2009, the ordinary legislative procedure (where Parliament and Council are co-legislators on an equal footing) was expanded to cover nearly all regulatory measures relating to the management of marine living resources under the CFP (Article 43.2 TFEU). Nonetheless, certain powers, particularly those relating to **'fixing and allocating fishing opportunities', continue to fall solely under the jurisdiction of the Council (Article 43.3 TFEU)**.[12] As multiannual plans tend to curtail the Council's competence on the allocation of fishing opportunities, the Council and the European Parliament were at odds on the appropriate legal basis for the adoption of multiannual plans.

[11] European Commission, impact assessment accompanying the proposal for a Baltic MAP regulation, (SWD)2014 291, 2014.

[12] See Treaty on the Functioning of the EU, Title III (Agriculture and Fisheries).

Tension culminated when **the Council, in December 2012, decided to adopt on its own, changing the legal basis,**[13] **a regulation amending an existing multiannual plan**.[14] In March 2013, the Commission and Parliament initiated legal proceedings before the Court of Justice of the EU against the Council's decision. Two years later, the Court ruled in favour of the European Parliament,[15] arguing that the amendments 'define the legal framework in which fishing opportunities are established and allocated' and are 'provisions necessary for the pursuit of the objectives of the CFP', and therefore should have been adopted under the ordinary legislative procedure. In other words, the Court confirmed that MAPs are a *framework* necessary for, but also different from, *measures* on fixing and allocating fishing opportunities; this confirms Parliament's role as co-legislator on the matter.

2.2.2. Calls for multiannual and multispecies regional management plans

2011 Council mandate for a Baltic Sea MAP

In the years following the adoption of the 2007 multiannual management plan for cod in the Baltic, the Commission organised a reflection exercise among stakeholders on whether to introduce another management plan for the pelagic species (sprat and herring), and to revise the Baltic cod plan. However, in June 2011, following consultations with Member States and stakeholders, a decision was taken to move to a single multispecies plan for the stocks of cod, herring and sprat. This decision, formalised by the Council in October 2011, stated that 'the Council invites the Commission to propose a long-term multispecies management plan that takes into account interactions between cod and pelagic species in the Baltic, as soon as practicable'.[16]

2013 CFP reform

The 2013 reform of the CFP pushed further in the direction of regionalisation and in favour of multiannual plans. The 2013 CFP Regulation called for multiannual plans to be adopted 'as a priority' to 'restore and maintain fish stocks above levels capable of producing maximum sustainable yield (MSY)'.[17] Article 9, provided in full in Box 1 below, defines the principles and objectives of the regulation.

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13 Using Article 43(3) TFEU where Parliament is only consulted, rather than Article 43(2) TFEU where Parliament is equal co-legislator.

14 Council Regulation (EC) No 1342/2008 establishing a long-term plan for the management of cod stocks in the Kattegat, the North Sea including the Skagerrak and the eastern Channel, to the west of Scotland and the Irish Sea.

15 Judgment of the Court (Grand Chamber) of 1 December 2015, *European Parliament and European Commission* v *Council of the European Union*. Actions for annulment — Regulation (EU) No 1243/2012 — Choice of legal basis — Article 43(2) and (3) TFEU — Policy decision — Long-term plan for cod stocks, Joined Cases C-124/13 and C-125/13.

16 Council of the EU, document 16684/11 ADD 1, 14 November 2011.

17 See recital 23 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy.

Box 1 – Multiannual plans in the 2013 CFP Regulation

Article 9

Principles and objectives of multiannual plans

1. Multiannual plans shall be adopted as a priority, based on scientific, technical and economic advice, and shall contain conservation measures to restore and maintain fish stocks above levels capable of producing maximum sustainable yield in accordance with Article 2(2).
2. Where targets relating to the maximum sustainable yield as referred to in Article 2(2) cannot be determined, owing to insufficient data, the multiannual plans shall provide for measures based on the precautionary approach, ensuring at least a comparable degree of conservation of the relevant stocks.
3. Multiannual plans shall cover either:
(a) single species; or
(b) in the case of mixed fisheries or where the dynamics of stocks relate to one another, fisheries exploiting several stocks in a relevant geographical area, taking into account knowledge about the interactions between fish stocks, fisheries and marine ecosystems.
4. The measures to be included in multiannual plans, and the calendar for implementing them, shall be proportionate to the objectives and targets pursued and to the time-frame envisaged. Before measures are included in the multiannual plans, account shall be taken of their likely economic and social impact.
5. Multiannual plans may contain specific conservation objectives and measures based on the ecosystem approach in order to address the specific problems of mixed fisheries in relation to the achievement of the objectives set out in Article 2(2) for the mixture of stocks covered by the plan in cases where scientific advice indicates that increases in selectivity cannot be achieved. Where necessary, the multiannual plan shall include specific alternative conservation measures, based on the ecosystem approach, for some of the stocks that it covers.

Article 10

Content of multiannual plans

1. As appropriate and without prejudice to the respective competences under the Treaty, a multiannual plan shall include:
(a) the scope, in terms of stocks, fishery and the area to which the multiannual plan shall be applied;
(b) objectives that are consistent with the objectives set out in Article 2 and with the relevant provisions of Articles 6 and 9;
(c) quantifiable targets such as fishing mortality rates and/or spawning stock biomass;
(d) clear time-frames to reach the quantifiable targets;
(e) conservation reference points consistent with the objectives set out in Article 2;
(f) objectives for conservation and technical measures to be taken in order to achieve the targets set out in Article 15, and measures designed to avoid and reduce, as far as possible, unwanted catches;
(g) safeguards to ensure that quantifiable targets are met, as well as remedial action, where needed, including for situations where the deteriorating quality of data or non-availability put the sustainability of the stock at risk.
2. A multiannual plan may also include:
(a) other conservation measures, in particular measures to gradually eliminate discards, taking into account the best available scientific advice, or to minimise the negative impact of fishing on the ecosystem, to be further specified, where appropriate, in accordance with Article 18;
(b) quantifiable indicators for periodic monitoring and assessment of progress in achieving the targets of the multiannual plan;
(c) where appropriate, specific objectives for the freshwater part of the life cycle of anadromous and catadromous species.
3. A multiannual plan shall provide for its revision after an initial ex-post evaluation, in particular to take account of changes in scientific advice.

Interinstitutional task force on multiannual plans

In parallel to the negotiations on the CFP reform, 2013 saw the creation of **an interinstitutional task force on multiannual plans** (Parliament, Council, Commission). The task force issued a report[18] in April 2014 that provided a blueprint for future Commission MAP proposals. On MSY targets, it considered that:

> *the scientific bodies should normally be asked to give a range of Fmsy-values, which would then be fixed, based on this advice, by the co-legislators in the plan. Fmsy ranges allow for an MSY-based management for a large number of stocks, and appear more robust to changes in the scientific advice. The Council would adopt measures on the fixing and allocation of fishing opportunities on an annual basis, based on scientific advice and in such a way as to achieve the objectives of the plan.*

2.2.3. Adoption of the Baltic Sea MAP

The preparation and adoption of the Baltic Sea MAP Regulation, between 2014 and 2016, was a long and difficult process. It was first delayed by the judicial row between Parliament and the Council on how much say Parliament should have in this plan's adoption and oversight (see Section 2.2.1) and further complicated by divergent views on what its content should be. Revisiting these debates can offer key lessons for evaluating critical aspects of the MAP and for a reflection on its future.

Commission proposal

The European Commission presented its proposal for the Baltic Sea MAP Regulation on 6 October 2014,[19] based on the 2013 reformed CFP, the 2014 interinstitutional task force recommendations, and the 2011 Council mandate. It covered cod, herring and sprat, which at the time accounted for over 94 % of catches in the Baltic Sea.[20] The objective was to restore and maintain fish populations above levels that can produce what is known as MSY, or the most that can be taken from a stock without compromising its reproduction levels.

The Commission proposal's main points were:

- **Targets**: they should correspond to MSY and are expressed as range values based on scientific advice from the International Council for the Exploration of the Sea (ICES). Ranges are expected to deliver a compromise between following scientific advice every year and long-term predictability for the sector.
- **Safeguards**: they should be included by defining for each stock a conservation reference point expressed in a minimum spawning biomass level. Should the stock fall below the reference point, remedial measures should rapidly be taken.
- The proposal implements legal obligations resulting from the 2013 CFP Regulation **to land all catches**.
- **Technical measures**: the MAP would be the framework and measures would be adopted through delegated acts.

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18 Task Force on multiannual plans, final report, April 2014.

19 European Commission, proposal for a Regulation establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, COM(2014) 614, 2014.

20 See explanatory statement of PECH committee report on the Baltic Sea MAP proposal, May 2015.

- **Evaluation**: the Commission is to evaluate every six years the impact of the plan on stocks covered and on fisheries, taking 'changes in scientific advice' into account.

Parliament's first reading

The PECH committee designated Jarosław Wałęsa (Poland, EPP) as rapporteur for the file.[21] The report was adopted by the PECH committee in March 2015, and adopted in plenary one month later. Parliament's position was supportive of the Commission proposal, pushing for an ambitious plan.

- **Targets**: Parliament proposed replacing the fishing mortality upper and lower limits (the ranges of FMSY proposed by the Commission for each fish stock) with ranges going from 0 to the maximum of the scientifically determined FMSY value.[22]
- **Safeguards**: while the Commission proposed fixed values for the minimum spawning biomass levels, Parliament proposed setting the conservation reference points equal to the BMSY values (i.e. the target biomass when fishing at MSY levels is achieved and maintained).
- **Technical measures**: the Commission proposal was broadly supported, references were added to Parliament in the adoption of delegated acts. Parliament also added provisions to exempt small-scale fisheries from certain restrictions.
- **Evaluation**: Parliament's position proposed an evaluation after three years and then every five years.
- Parliament also added a series of references and procedural steps to reinforce the **regionalisation** objective.

Trilogue negotiations started after the adoption of Parliament's position at first reading.

Council's general approach

The Council had a first 'globally favourable' exchange of views on the Commission proposal in January 2015, although the minutes record that certain Member States had concerns about the legal basis and about the reach of certain power delegations to the Commission.[23] The Council presidency expressed its hope of achieving a negotiation position to engage with Parliament in the first half of 2015.[24]

In April 2015, a general approach[25] was found among Member States in the Council. Spain and France, who would have preferred a partial general approach for as long as the legal proceedings against the Council in the Court of Justice of the EU (see Section 2.2.1) were ongoing, added in a statement their continued reservations on the legal basis, and insisted on the 'unsuitability of the ordinary legislative procedure for guaranteeing the revision, in a reasonable period of time, of fishing

21 Multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, 2014/0285(COD), Legislative observatory, European Parliament.

22 European Parliament first reading report, 2015.

23 Verbatim account of the Council meeting of 26 January 2015.

24 Press briefing on the Council meeting of 26 January 2015.

25 General approach of the Council on the proposed Baltic Sea MAP Regulation, 20 April 2015.

mortality ranges and minimum spawning-stock biomass levels as required by recent scientific advice.'[26]

Key elements of the Council's general approach were to keep the Commission fishing mortality rates expressed in ranges and move those ranges to the annexes. Most importantly, Member States agreed to **remove the proposed Article 4 on targets, replaced by a new Article 5 that would have been on 'Fishing opportunities'**, providing that 'the Council shall fix fishing opportunities in accordance with the objectives set out in Article 3', moving references to the target mortality rates to Annex I.

Trilogue negotiations

After Parliament's plenary vote in April 2015, the file was sent back to the PECH committee where a mandate to set up a negotiation team led by the rapporteur, Jarosław Wałęsa, was adopted on 6 May 2015.[27] The Council and Parliament negotiated the existing regulation on the basis of their general approach and first reading position respectively.

Interinstitutional (trilogue) negotiations proved lengthy and difficult for a file of this nature. In June 2015, after a first series of meetings that failed to reach a compromise, the rapporteur held a press conference in which he stated: 'I am very disappointed with the attitude of the Council. They blatantly refuse to honour the Common Fisheries Reform. It seems like they insist on business as usual, keeping their right to over-exploit fish stocks.'[28]

The rapporteur explained that, ultimately, the Council and Parliament disagreed on the nature of the FMSY objective. **For the Council, fishing at levels maintaining MSY is considered a 'target'**, hence the possibility to use ranges and possibly decide on yearly catches that could exceed FMSY. **For Parliament**, invoking Article 2.2 of the 2013 CFP Basic Regulation, **the FMSY should only be seen as an upper 'limit' for setting fishing opportunities**.

Finally, **in March 2016, after eight rounds of trilogue meetings, the negotiation teams found a political agreement on the file**. Rapporteur Jarosław Wałęsa said:[29] 'After 10 months of difficult negotiations with the Council and the European Commission, the Baltic has a plan which we can be proud of ...'

The PECH committee voted on, and approved, the outcome of the trilogue negotiations on 19 April 2016. On 23 June 2016, the plenary adopted the political agreement in the form of a compromise amendment (amendment 65) to the proposal for a regulation. The rapporteur on this occasion noted that 'this first fisheries management plan under the new common fisheries policy (CFP) was hard fought and was the result of very difficult, long negotiations, in which Parliament had to make many concessions'.[30]

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26 Verbatim account of the Council meeting of 8 May 2015.

27 See PECH committee minutes of the 6 May 2015 meeting.

28 See PECH committee press release and video of press conference, 24 June 2015.

29 See PECH committee press release, 16 March 2016.

30 See verbatim report of the European Parliament plenary session of 22 June 2016.

The Council voted on the compromise text on 27 June 2016, and the new Regulation (EU) No 2016/1139 of the European Parliament and of the Council establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks came into force in July 2016.

Table 2 – Targets of mortality by fishing, as proposed by the European Commission, the European Parliament, the Council and as in the adopted regulation

Stock	Target fishing mortality range in Commission proposal	Target fishing mortality range in Parliament's position at first reading	Target fishing mortality range in Council's general approach	Target fishing mortality range at the adoption of the regulation	
				Lower values (Article 4.2 and 4.3)	Higher values (Article 4.4 stocks above MSY)
Western Baltic cod	0.23–0.29	0 to FMSY	0.15–0.45	0.15–0.26	0.26–0.45
Eastern Baltic cod	0.41–0.51	0 to FMSY	Not defined (but should be before adoption of the regulation)	Not defined	Not defined
Central Baltic herring	0.23–0.29	0 to FMSY	0.16–0.28	0.16–0.22	0.22–0.28
Gulf of Riga herring	0.32–0.39	0 to FMSY	0.24–0.38	0.24–0.32	0.32–0.38
Bothnian Sea herring	0.13–0.17	0 to FMSY	0.09–0.13	0.11–0.15	0.15–0.18
Bothnian Bay herring	Not defined	0 to FMSY	Not defined (but should be before adoption of the regulation)	Not defined	Not defined
Western Baltic herring	0.25–0.31	0 to FMSY	0.23–0.41	0.23–0.32	0.32–0.41
Baltic sprat	0.26–0.32	0 to FMSY	0.19–0.27	0.19–0.26	0.26–0.27

Source: Compiled by the author. Note: This table represents ranges at the time of adoption of the regulation. Regulation (EU) 2019/472 amended the Baltic Sea MAP, Articles 4 and 5 were replaced, and Annex 1 with target fishing mortality ranges was removed.

3. Implementation and evaluation of the Baltic Sea MAP

This section continues with the analysis of the key positions of the Council and Parliament, with a focus on the implementation of the regulation. Legal adaptations through revisions have been possible, although the latest attempt failed. Moreover, it assesses the Commission's efforts to comply with its monitoring and reporting obligations. Finally, it provides the context leading to Parliament's own-initiative implementation report and explains how this European implementation assessment seeks to support the PECH committee's related work.

3.1. Implementation and revisions of the Baltic Sea MAP Regulation

The Baltic Sea MAP entered into force in 2016 and has since continued to evolve – through amendments to the regulation, the adoption of technical measures, and the adoption of annual Council decisions setting fishing quotas.

The regulation has been amended five times since 2016:[31]

- in 2018, to set the Gulf of Bothnia herring mortality rate;
- in 2019, with a series of updates to ensure alignment with the newly adopted MAP for the Western waters, Regulation (EU) 2019/472. It makes important changes to the targets and safeguards, and removes the tables in Annex 1 with target mortality ranges and Annex 2 with conservation reference points;
- in 2019, to ensure alignment with the new Regulation (EU) 2019/1241 on the conservation of fisheries resources and the protection of marine ecosystems through technical measures;
- in 2020, with the adoption of Regulation (EU) 2020/1781 amending Regulation (EU) 2016/1139 as regards fishing capacity reduction in the Baltic Sea, and Regulation (EU) No 508/2014 as regards permanent cessation of fishing activities for fleets fishing for Eastern Baltic cod, Western Baltic cod and Western Baltic herring;
- in 2023, to ensure coherence with the Union's updated fishery control system.

In addition to those five amendments, the latest revision attempt, presented as technical, failed to get support for continued examination by the 10th legislature. In December 2023, the Commission had made a proposal[32] to remove what they qualified as an 'inconsistency' from the three existing MAPs (not just the Baltic one). The inconsistency flagged by the Commission is that the MAPs' rules on targets (Article 4.6 in the Baltic Sea MAP) include a '5 % rule', which states: 'Fishing opportunities shall in any event be fixed in such a way as to ensure that there is less than a 5 % probability of the spawning stock biomass falling below B_{lim}.' Under certain conditions, this rule can make it impossible to set targets for certain stocks, forcing complete suspension of the related fisheries. However, Article 5 would in that same situation mandate remedial measures to restore the stock rather than

[31] See the dedicated Eur-Lex web page for details.

[32] Proposal for a Regulation amending Regulations (EU) 2016/1139, (EU) 2018/973 and (EU) 2019/472 as regards the targets for fixing fishing opportunities, COM(2023) 771, 2023.

suspension measures. According to the Commission, Article 4.6 can have 'severe socioeconomic implications'[33] and should be removed from the MAPs.

The Council was quick to react; a working party examined the proposal the day after its publication, and in less than a month the Council was ready to start negotiations with Parliament and asked it to use an urgency procedure.[34]

Parliament did not share the Council's sense of urgency and declined the use of an accelerated procedure.[35] Rapporteur Pierre Karleskind (France, Renew), who was also chair of the PECH committee, presented a 'working document' at the PECH meeting of 9 April 2024.[36] The document was intended as a handover for future Members after the summer 2024 European Parliament elections. Among other things, the working document regrets the lack of an impact assessment accompanying the proposed measures and notes the need for more information from the Commission: 'The Commission needs to further clarify its proposal and underlying objectives regarding the removal of articles 4(6) and 4(7) in the respective MAPs to fully understand how actions to support recovery of stocks should be done in other ways.'

The rapporteur also pointed out that the Commission proposal came 'after the decision by the Council to ignore the "5%" rule, leading to a breach of a regulation of the Parliament and the Council'.

With the start of the European Parliament's 10th legislature, committees had to decide on resuming the examination of unfinished files from the 9th legislature. **On 23 September 2024, a tied vote (13 votes in favour, to 13 votes against, with 0 abstentions)[37] meant that the file on the proposal to revise the MAPs would not be reopened by the PECH committee**, leaving it up to the Commission to withdraw their proposal and possibly make a new one.

[33] See explanatory memorandum.

[34] See European Parliament, Amending the multiannual plans for certain stocks fished in the Baltic Sea, the North Sea and the Western Waters as regards the targets for fixing fishing opportunities, Legislative Train Schedule.

[35] See minutes of the plenary session of 16 January 2024, point 6.2: 'Parliament rejected the request for urgent procedure'.

[36] European Parliament, working document on the proposal for a Regulation amending Regulations (EU) 2016/1139, (EU) 2018/973 and (EU) 2019/472 as regards the targets for fixing fishing opportunities 2024, PECH committee, April 2024.

[37] See results of the roll call vote in the PECH committee, 23 September 2024.

3.2. Commission reporting and evaluation obligations

The Baltic Sea MAP Regulation created a double reporting obligation for the European Commission, with **a general reporting obligation on results and impacts** after three years of implementation (Article 15, see Box 2) and **a specific reporting obligation on the temporary delegation of power to adopt delegated acts** (Article 16) before the end of the first five-year mandate.[38]

Box 2 – Article 15

Evaluation of the plan

By 21 July 2019, and every five years thereafter, the Commission shall report to the European Parliament and to the Council on the results and impact of the plan on the stocks to which this Regulation applies and on the fisheries exploiting those stocks, in particular as regards the achievement of the objectives set out in Article 3. The Commission may report at an earlier date if this is deemed necessary by all Member States concerned or by the Commission itself.

The Commission's 'First report on the implementation of the Multiannual Plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks'[39] was published in September 2020; a year late according to Article 15, but in time for the first reporting requirement under Article 16. 'This report … presents the developments in the relevant areas of the MAP's implementation and strives to draw conclusions after three full years of implementation (2017–2019) and fishing opportunities established under the MAP for four consecutive years (2017–2020).'

The report is a 10-page overview of the implementation of the MAP, supported mostly by qualitative evidence. It concludes that 'the MAP provides a stable long-term instrument to implement the CFP in the Baltic Sea, offering less uncertainty for quota setting, ensuring remedial measures for stocks under pressure, making the quota setting process more transparent for stakeholders and Member States and allowing the fishing industry to better plan their fisheries'. The report was accompanied by a much more substantial staff working document.[40]

The report contained some limited information on delegated powers; for instance, the Commission noted the possibility for Member States to recommend technical measures, thereby also contributing to regionalisation. The Commission also stated that 'the adoption of delegated acts also takes time due to the various scientific and administrative steps in the process'.

The Commission's second report was published in September 2024,[41] i.e. four years after the first report (instead of the five years set in Article 15) but back in line with the regulation's original timeline (July 2019 and then every five years). This time, the Commission clearly stated that the report also serves the Article 16 obligations: 'The first report was published in 2020, and this second report focuses on relevant developments since then. It also covers the reporting obligation pursuant to Article 16(2) of the MAP on the delegation of powers conferred to the Commission.'

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38 The first five-year mandate ended in July 2021, with the report due nine month before, i.e. October 2020.

39 See COM(2020) 494.

40 See SWD(2020) 171.

41 European Commission, Second report on the implementation of the multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, COM(2024) 703, 2024. This, too, was accompanied by a more substantive staff working document (SWD(2024) 703).

The findings were similar to those of the first report; the Commission continues to consider that the MAP has proven to be a helpful tool to implement the CFP. The Commission did however note that 'it has become increasingly challenging to apply the rules of the MAP and strive to manage all stocks at FMSY in a mixed fisheries context with an increasing number of weak stocks. The deterioration of fish stocks has occurred in the context of the Baltic Sea ecosystem undergoing a fundamental change and not being in balance.'

In the report, the Commission voices concern over the degradation of fish stocks and fisheries, although it believes this degradation is not attributable to the MAP's implementation but to changes in the wider ecosystem. The Commission lists the Baltic Sea as a priority in its Ocean Pact strategy of June 2025 and will be organising the third edition of the 'Our Baltic Conference' on 30 September 2025, gathering not only EU ministers in charge of fisheries but also of environment and agriculture, together with Members of the European Parliament, the scientific community and the relevant regional organisations.[42]

Overall, the Commission seems to have complied with its reporting obligations set in the regulation. The one-year delay regarding the Article 15 deadline for the first report allowed it to combine that report with the Article 16.2 reporting obligations; a choice that may be considered justified if the approach is taken that no urgent revision of the regulation was needed in 2019. The Commission reports were implementation reports focused on effectiveness by reviewing actions and impacts. This EPRS study is thus the first evaluation of the Baltic Sea MAP Regulation that, beyond effectiveness, also covers the MAP's relevance, efficiency, coherence and EU added value, in line with the Better Regulation Toolbox.

3.3. Evaluation by the European Parliament

Parliament and the PECH committee, in particular, have long shown much interest in the implementation of the Baltic Sea MAP and the situation of fish stocks and fisheries in the Baltic, as attested by resolutions (such as a 2021 resolution on chemical residues in the Baltic Sea) and various questions from Members to the Commission on this topic (e.g. on fish stocks, wastewater treatment and spatial planning).[43] In January 2023, PECH also held a public hearing on the 'State of play of the implementation of the Multiannual Plan (MAP) for the Baltic Sea', gathering scientific experts and stakeholders.[44]

The launch of the own-initiative implementation report 2024/2127(INI) on 'The multiannual plan for the Baltic Sea and ways forward' is another important step in Parliament's commitment to the monitoring and evaluation of the MAP's implementation. To inform the committee and its Members in this procedure, Parliament services launched two research projects in coordination: the current

[42] See Commission website.

[43] For a summary of the European Parliament's resolutions on fisheries in the Baltic Sea since 2016 and Members' questions to the Commission on this topic, see A. Altmayer, Baltic Sea fishing area: Current challenges, EPRS, European Parliament, January 2025.

[44] See event website.

evaluation of the regulation and a background analysis by a scientist expert on fisheries and the Baltic Sea.[45]

The evaluation study, together with this introduction, are part of the series of **European implementation assessments** that the EPRS Ex-post Evaluation Unit prepares in support of committee work on implementation reports. Information on the study is provided below.

Objectives and limits of the evaluation study

To prepare the required research evidence – the Directorate for Impact Assessment and Foresight within Parliament's Directorate-General for Parliamentary Research Services (DG EPRS) – commissioned a study on the 'evaluation of the implementation of Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks' ('the study' or 'evaluation study').

The external evaluation study was commissioned by EPRS to a consortium led by ÖIR GmbH, with the company **M&E Factory monitoring and evaluation GmbH leading on the research and drafting**. Work on the study started in mid-March 2025, and the final deliverable was submitted in July 2025.

The study seeks to assess, to the extent possible, the practical implementation of the legislative framework against the standard set of criteria for ex-post evaluation, namely: relevance, effectiveness, efficiency, coherence and EU added value, as defined under the EU Better Regulation Toolbox.

In terms of scope, the study covers the Member States concerned over the nine years since its entry into force. It relies both on existing literature, including official and scientific reports, and on fresh information gathered through interviews with stakeholders.

The study's ambitious objectives, combined with a challenging timeline for its execution, meant that strategic choices had to be made as to the overall number of interviews and the level of quantification of the regulation's outcomes. Despite these constraints, **the experts managed to organise dedicated interviews with 22 stakeholders from various national, regional and EU levels, seeking a balance between types of stakeholders and Member States**. Furthermore, by crossing sources, **the study seeks to provide a comprehensive picture of where the regulation has delivered on its expected impacts**, even if no full cost-benefit analysis was possible within the timeframe.

Key findings of the evaluation study

The study finds mixed results. Fishing pressure was reduced and alignment of the TAC with scientific advice improved, but key stocks did not see their biomass levels restored to sustainable levels. Challenges range from inconsistent application of the precautionary approach to insufficient integration of ecosystem considerations. The landing obligation faces implementation issues. The socioeconomic impact, particularly on small-scale coastal fleets, has been severe. The study

[45] C. Möllmann, The multiannual plan for the Baltic Sea – A change in management needed, Policy Department for Regional Development, Agriculture and Fisheries, European Parliament, August 2025.

concludes that better ecosystem-based and stronger precautionary management is necessary, together with enhanced regional cooperation and stronger safeguards. Recommendations focus on clarifying regulatory ambiguities, enhancing regional cooperation and local stakeholder engagement, operationalising ecosystem-based management, strengthening the scientific basis and aligning fishing opportunities with scientific advice, reinforcing monitoring and data collection, and fostering cross-policy coherence – thereby supporting the future improvement or revision of the Baltic MAP.

Contribution to Better Regulation

The study provides a transparent account of the views expressed by stakeholders and of any disagreements documented, which is an important contribution of the research project to transparent EU policymaking, in line with the EU Better Regulation agenda.

The feedback received from stakeholders through interviews designed specifically for the purposes of this evaluation provides original and up-to-date knowledge for EU policymakers. The response rate to interview requests further shows the importance that the stakeholders give to the MAP. The replies also reflect the understanding of the importance of informing Parliament about the implementation of rules it adopted together with the Council.

As such, the findings of the evaluation study and the recommendations make a genuine contribution to the work of the European Parliament's PECH committee, particularly in the context of the Baltic Sea MAP own-initiative implementation report. However, its findings are also relevant in the forthcoming work of the Commission, Council and Parliament on the ongoing evaluation of the CFP and the discussions on financing the CFP under the next multiannual financial framework.

Evaluation of the EU Baltic Sea Multiannual Plan Regulation

Part II

This study evaluates the implementation of the EU Baltic Sea Multiannual Plan (Baltic MAP), established under Regulation (EU) 2016/1139. The Baltic MAP aims to ensure the sustainable exploitation of cod, herring, and sprat stocks in line with the 2013 Common Fisheries Policy (CFP). Drawing on desk research and interviews with stakeholders across the Baltic region, the study finds mixed results. Although the MAP has contributed to reduced fishing pressure and improved alignment of the Total Allowable Catch (TAC) with scientific advice, it has not succeeded in restoring the targeted stocks to above the Maximum Sustainable Yield (MSY) reference levels. Key challenges include inconsistent application of the precautionary approach and insufficient integration of ecosystem considerations. Enforcement of the Landing Obligation also remains weak. Socio-economic impacts, particularly on small-scale coastal fleets, have been severe, with significant declines in fleet capacity, profitability and employment. The study concludes that more ecosystem-based and precautionary management is necessary, together with enhanced regional cooperation and stronger safeguards, to achieve Good Environmental Status and rebuild fish stocks. Recommendations focus on clarifying regulatory ambiguities in the Baltic MAP Regulation, enhancing regional cooperation and local stakeholder engagement, operationalising ecosystem-based management, strengthening the scientific basis and aligning fishing opportunities with scientific advice, reinforcing monitoring, data collection, and fostering cross-policy coherence – thereby supporting the future improvement or revision of the Baltic MAP.

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Executive summary

The Baltic Sea Multiannual Plan (Baltic MAP), established through Regulation (EU) 2016/1139, represents the European Union's first regionalised implementation framework under the 2013 reformed Common Fisheries Policy (CFP). Adopted in 2016, the plan aims to ensure the sustainable exploitation of the most commercially important fish stocks in the Baltic Sea – cod, herring and sprat – while applying a precautionary and ecosystem-based approach to fisheries management.

This evaluation study, commissioned by the European Parliamentary Research Service (EPRS), assessed the implementation of the Baltic MAP since 2016 and examined whether it has effectively advanced the objectives of the CFP, in particular achieving Maximum Sustainable Yield (MSY), restoring fish stocks, and strengthening a long-term management framework for EU fishers in the Baltic Sea. The study combined a theory-based assessment model, supported by desk research and interviews with 22 stakeholders from various national, regional and EU levels.

Key Findings

Effectiveness of the Baltic MAP: The plan has delivered limited achievements against its objectives. Key fish stocks, particularly cod and herring, remain below critical biomass thresholds, and the overall environmental status of the Baltic Sea has shown little improvement. Socio-economic impacts have also been negative, particularly for small-scale fisheries. The gap between Council decisions on annual catches and scientific recommendations has narrowed, but some discrepancies remain. Stakeholders highlight inconsistencies in applying precautionary measures, and the integration of ecosystem-based fisheries management remains incomplete, as broader marine pressures are not sufficiently addressed. Safeguard measures have been introduced by Member States, but their impact has often been constrained by enforcement challenges. The Landing Obligation has also been weakly implemented, hindered by enforcement gaps, compliance problems, and regulatory complexity that creates practical difficulties for fishers. Regional implementation has taken place, but its potential has not been fully realized due to limited resources, lack of formal structures and clear processes for regional platforms, weak coordination and diverging national interests.

Coherence of the Baltic MAP: Overall, the Baltic MAP Regulation is considered by stakeholders as a relevant regulatory framework for fisheries management in the Baltic Sea region. However, some discrepancy is observed within the regulation itself, particularly between Article 4(6), which calls for stricter measures, and Article 5, which refers only to the possibility—not the obligation—to suspend targeted fisheries. Coherence exists between the MAP and the national policies and EU funding instruments such as EMFAF. However, the plan´s focus on fishing pressure alone is insufficient to address the wider, multifaceted ecosystem pressures. Year-to-year flexibility provisions are seen by some as beneficial for adapting fishing activities, others perceive them as having limited positive effects and prioritise predictability over flexibility.

Relevance of the Baltic MAP: The objectives of the Baltic MAP continue to be relevant. Some amendments were made to respond to new developments in the sector and scientific advice, but

the plan has not evolved enough in the face of new scientific insights and rapidly changing environmental and socio-economic conditions.

Efficiency of the Baltic MAP: Stakeholders generally view the MAP as a necessary and well-designed tool. However, its implementation is often seen as time-consuming and too rigid to respond quickly to environmental challenges. Stakeholder opinions diverge on the MAP's administrative burden, with some attributing increased workload mainly to the broader Control Regulation, while others see the plan itself as adding some bureaucracy and costs—particularly for small-scale fisheries—though much of this may stem from national implementation decisions. The MAP's monitoring system is considered efficient, leveraging on existing EU and national data collection frameworks. There are concerns regarding misreporting, lack of official data from Russia, lack of integration of recreational fisheries data and insufficient funding for data collection.

Added value of the Baltic MAP: Despite its shortcomings, stakeholders widely agree that the Baltic MAP remains an essential framework. Without the MAP, progress in sustainable fisheries management, regional alignment, and adherence to scientific advice would have been significantly weaker or more limited.

Conclusions and recommendations

The Baltic MAP has provided an improved and more predictable framework for managing fishing opportunities and has fostered regional cooperation in the Baltic Sea. However, its effectiveness in achieving its overarching ecological and socio-economic goals has been limited. The failure to restore fish stocks above reference levels, weak integration of ecosystem considerations and insufficiently precautionary quota settings have undermined progress.

Moreover, external pressures – including eutrophication, climate-driven changes, pollution and growing predator populations – further complicate the Baltic's marine environment and require fisheries management systems that are more adaptive and ecosystem-oriented. The MAP alone cannot resolve these broader challenges, and it would benefit from being more closely integrated with other regional environmental policy tools to avoid further degradation and support a more resilient Baltic Sea.

Key recommendations supporting the future improvement or revision of the Baltic MAP include:

Improving the existing Baltic MAP framework

i. Clarify ambiguities within the Baltic MAP Regulation: the European Commission could be asked to develop a legal guidance note clarifying the practical application of Articles 4(6) and 5 of the Baltic MAP Regulation to ensure consistent and clear implementation of precautionary and remedial measures. Article 4(6) suggests stricter actions, while Article 5 offers a more flexible approach, referring to the possibility, not the obligation, to suspend a targeted fishery, and allow for a case-by-case assessment of appropriate remedial measures.
ii. Strengthen coherence with EU policies and regional initiatives: The European Commission could be requested to launch a comprehensive, in-depth study to assess the alignment of the MAP with other EU legislation and macro-regional strategies to

identify synergies, gaps and administrative overlaps. The European Commission could also be requested, in consultation with Member States, to clarify the Baltic MAP's position within the National and Regional Partnership Plans (NRPPs) of the next Multiannual Financial Framework 2028–2034, which would guide strategic allocation of EU and national resources to support interventions addressing both fishing and non-fishing pressures on Baltic fish stocks.

iii. Foster inter-regional learning across MAPs: The European Commission could be asked to establish an EU-wide cooperation and dialogue platform for experience sharing between different regional MAPs.

iv. Ensure fishing opportunities and safeguards are timely and fair, especially for small-scale coastal fisheries (SSCF). The European Commission could be requested to launch a targeted study on the socio-economic impact of TAC changes and safeguard measures on SSCF and coastal communities across Baltic Member States. It could also be tasked to introduce an SSCF consultation step in the development of MAP-related decisions.

v. Enhance regionalisation and cooperation: Member States could be encouraged to increase the use of joint recommendations through regional cooperation bodies (e.g. BALTFISH). Enhanced and structured collaboration between BALTFISH, BSAC, ICES, HELCOM and other regional bodies is also recommended. Strengthened cooperation with non-EU actors such as Norway could also support more coherent shared-stock management (e.g. for Western Baltic herring).

vi. Strengthen the scientific basis and optimise data collection and monitoring: The European Commission could be tasked to coordinate with ICES and Member States to broaden the scope of data collection under the Data Collection Framework (DCF) to better capture ecosystem health and non-fishing pressures. EMFAF funding could be prioritised to support these improvements/upgrades. Moreover, the European Commission and Member States could be asked to strengthen their monitoring and control systems (e.g. through the adoption of electronic systems, introducing real-time reporting tools, prioritising high-risk fleets that present an elevated likelihood of non-compliance with regulations). These ongoing and future efforts, already supported by the EMFAF, could be reinforced and strategically prioritised.

vii. Ensure consistent application of the precautionary approach: The Council of the EU and the European Commission, in cooperation with ICES, could be tasked with formalising the systematic use of precautionary buffers when setting TAC, providing transparent and publicly available operational guidance.

viii. Align decisions on fishing opportunities with scientific advice and enhance transparency: To address discrepancies between advice and fishing opportunities, the Council of the EU could be reminded – via a resolution – to align TACs more strictly with ICES advice and improve transparency in deviations. Annual reviews might be published to document cases of deviation and justifications. The Commission, supported by ICES, could also be asked to provide clearer and more accessible guidance to ministers of the Council of the EU by clarifying the basis of scientific advice and their proposals for TACs.

ix. Improve socio-economic integration and stakeholder involvement: The European Commission, Member States, and regional bodies could be recommended to systematically embed stakeholder engagement mechanisms within the Baltic MAP's advisory and decision-making processes, with a particular emphasis on local actors in coastal and municipal communities.

x. Increase awareness of the Baltic MAP and its objectives: The European Commission, in cooperation with Member States and regional cooperation bodies (e.g. BALTFISH, BSAC), could be tasked to coordinate targeted awareness and outreach activities at national level to improve understanding of the Baltic MAP's role and objectives.

On the potential revision of the Baltic MAP framework

i. Broaden scope and integrate the ecosystem-based approach: the European Commission could be requested to initiate a revision of the MAP regulation that expands its scope beyond just regulating the three current fish stocks and catches, and explicitly integrates ecosystem-based objectives, including spatial planning (e.g. determining where fishing can still take place in the future, and under what conditions) and non-fishing pressures, in consultation with regional bodies like BALTFISH, BSAC, HELCOM, the Baltic Member States, the scientific community and other relevant stakeholders.

ii. Operationalise holistic ecosystem-based management, considering all factors affecting fish stocks, not solely fishing: the European Commission and Member States, supported by ICES, could be requested to pilot ecosystem-based models for the Baltic MAP fish stocks, incorporating environmental drivers into TAC setting. This would involve: clarifying the concept of ecosystem-based management within the MAP and MAP's scope as a fisheries management tool operating within wider ecosystem constraints, integrating species interactions and environmental indicators (e.g. predator impacts, eutrophication) into scientific advice through ecosystem modelling, establishing response mechanisms to trigger coordinated action across policies (e.g. in case of low oxygen levels) and investing in monitoring systems to track key ecosystem variables.

iii. Increase flexibility and adaptability: European Commission could be requested, in collaboration with regional cooperation bodies and Member States, to design and implement adaptive management protocols, allowing for adjustments of TACs and measures based on real-time environmental or stock data. Establishing a crisis management mechanism to deal with unexpected ecosystem changes and a science task force for urgent advice could be considered. Any adaptive management approach would need to be carefully assessed to ensure predictability and transparency for fisheries stakeholders, particularly in terms of planning and investment security.

iv. Refine MSY targets to reflect environmental uncertainty: The European Commission could be asked to initiate an independent scientific review of the MSY approach under altered ecosystem conditions. For instance, the review could explore whether shifting from full MSY to more conservative benchmarks (e.g. a proportion of MSY or lower reference points) could enhance stock resilience, how MSY-based TACs could be

applied over multi-year periods, combined with TAC adjustment mechanisms, and feasibility of integrating environmental stressors into MSY models.

v. Institutionalise regular Baltic MAP evaluation: The European Commission could be tasked to launch a regular five-year evaluation cycle for the Baltic MAP, and overall, for all multiannual plans.

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List of abbreviations

BALTFISH	Baltic Sea Fisheries Forum
Blim	Biomass Limit Reference Point
BMS	Below Minimum Size
Bpa	Precautionary reference point for spawning stock biomass (SSB)
BSAC	Baltic Sea Advisory Council
Btrigger	Biomass trigger is a reference point for spawning stock biomass (SSB) of a fish stock
CCB	Coalition Clean Baltic
CFP	Common Fisheries Policy
COM	European Commission
DCF	Data Collection Framework
EFCA	European Fisheries Control Agency
EIA	European Implementation Assessment
EMFAF	European Maritime, Fisheries and Aquaculture Fund 2021-2027
EMFF	European Maritime and Fisheries Fund (EMFF) 2014-2020
EPRS	European Parliamentary Research Service
Flim	Limit reference point for fishing mortality
FMSY	Fishing Mortality at Maximum Sustainable Yield
FTE	Full-Time Equivalent
GES	Good Environmental Status
GT	Gross Tonnage
HELCOM	Baltic Marine Environment Protection Commission
ICES	International Council for the Exploration of the Sea
INI	Own-Initiative Report

LO	Landing Obligation
LSF	Large Scale Fleet
MA	Managing Authority
MAP	Multiannual Plan
MOT	Margin of Tolerance
MSFD	Marine Strategy Framework Directive
MSY	Maximum Sustainable Yield
PECH committee	European Parliament's Committee on Fisheries
SSCF	Small-Scale Coastal Fleet
STECF	Scientific, Technical and Economic Committee for Fisheries
SWD	Staff Working Document
TAC	Total Allowable Catch

Introduction

Background

The 2013 reform of the Common Fisheries Policy (hereinafter referred to as CFP) emphasised the need for ecosystem-based fisheries management and long-term sustainability, providing the impetus for developing multiannual plans. The multiannual plans (MAPs) were adopted by the EU as an important tool for fisheries management to help ensure the sustainable exploitation of fish stocks.

The Baltic Sea Multiannual Plan (MAP), established under Regulation (EU) 2016/1139 and **adopted in 2016,** was the first and the model for the other plans. The Baltic MAP is a **regionalised implementation framework for the CFP,** designed to achieve the CFP objectives in the specific context of the Baltic Sea. The plan **aims to ensure the sustainable exploitation of key fish stocks, specifically cod, herring and sprat.** The MAP outlines objectives for achieving and maintaining maximum sustainable yield (MSY)[1] for these stocks and establishes rules for setting fishing opportunities, thereby contributing to the broader goals of the CFP.

In 2020, the European Commission released its first report on the implementation of the Baltic MAP. In January 2023, the Fisheries Committee (PECH committee) organised a hearing on the state of play of the implementation of the MAP. The Commission's second report was delivered in September 2024.[2]

In December 2023, the European Commission proposed modifications to the existing MAPs, highlighting, among other things, that "applying the 5 % rule[3] could have severe socio-economic implications"[4]. In response, members of the PECH committee[5] decided to draft an "Own-Initiative Report (INI)" entitled "The multiannual plan for the Baltic Sea and ways forward". The report aims to evaluate whether the MAP has contributed to the region's CFP objectives – specifically, achieving MSY or at least aiding in the recovery of Baltic fish stocks – while also improving the regulatory

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1 CFP Regulation (EU) No1380/2013, Article4(1): (7) "maximum sustainable yield means the highest theoretical equilibrium yield that can be continuously taken on average from a stock under existing average environmental conditions without significantly affecting the reproduction process"

2 European Parliament, PECH – State of Play of the Implementation of the Baltic Sea MAP, Brussels, 2023

3 According to Article 4(6) of Baltic MAP Regulation, fishing opportunities shall in any event be fixed in such a way as to ensure that there is less than a 5 % probability of the spawning stock biomass falling below Blim. Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat

4 The Parliament's Committee on Fisheries (PECH) voted on 23 September to reject the Commission's proposal to remove essential safeguards for fish populations under MAPs for the Baltic Sea, North Sea, and Western Waters, Committee on Fisheries (PECH), Video, 2024; FishSec, PECH rejects attempt to remove safeguards in management plans, 2024

5 Committee on Fisheries, Latest news, website

framework for EU fishers in the area. This report is also politically significant for other MAPs (e.g. the North Sea and Western Waters), which were developed based on the Baltic model.[6]

To provide research support for this parliamentary work, the Directorate for Impact Assessment and Foresight of the European Parliamentary Research Service (EPRS) **commissioned an evaluation study** in March 2025 titled "Evaluation of the implementation of Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks".

This report is the main and final deliverable of this evaluation study, providing insights to inform the ongoing parliamentary work of the PECH committee.

Aim and scope of the evaluation study

The objective of this evaluation study is to accompany the work of the PECH committee on the implementation report 2024/2127(INI) on "The multiannual plan for the Baltic Sea and ways forward", with evidence on the implementation and effectiveness of the Baltic MAP.

The study aims to determine whether the Baltic MAP has successfully advanced CFP targets in the region – specifically, whether it has achieved or contributed to achieving MSY and fostered the recovery of Baltic fish stocks – while establishing a more robust management framework for EU fishers.

The study was launched on 17 March 2025 and completed at the end of July 2025. Its results will be incorporated into a European Implementation Assessment (EIA) prepared by the EP EVAL Unit, providing valuable insights for policymakers and other stakeholders.

Structure of the report

This final evaluation study contains the following **key sections:**

- **Executive summary:** a concise overview of the evaluation study, tailored for a general audience.
- **Introduction:** describes the aim and scope of the evaluation study.
- **Methodology:** details the methodological approach and methods used for the study.
- **The Baltic Sea:** describes its main characteristics and changes to the Baltic MAP Regulation (EU) 2016/1139.
- **Findings:** summarizes the main information gathered from desk and field research.
- **Conclusions and recommendations**: addresses the evaluation questions and provides specific recommendations.
- **Annexes:** provides supporting information, including sources and a list of interview partner organizations.

[6] European Anglers Alliance, EAA's input to the EU Parliament's report on the EU Multiannual Fisheries Management Plans (MAPs), 2025

This final report also incorporates the comments and feedback from the online validation workshop (held on 25 June 2025), along with other input from the EPRS and an external peer reviewer.

1. Methodology

The Baltic MAP evaluation study is based on a theory-based approach[7]. The theory-based approach provides the opportunity to develop a detailed analysis of the process and implementation of the Baltic MAP, understanding why and how certain outcomes were achieved or not achieved, by linking activities to specific causal mechanisms. Moreover, the outputs from such an approach provide a narrative that facilitates an understanding of what works in the Baltic MAP, why and in what context.

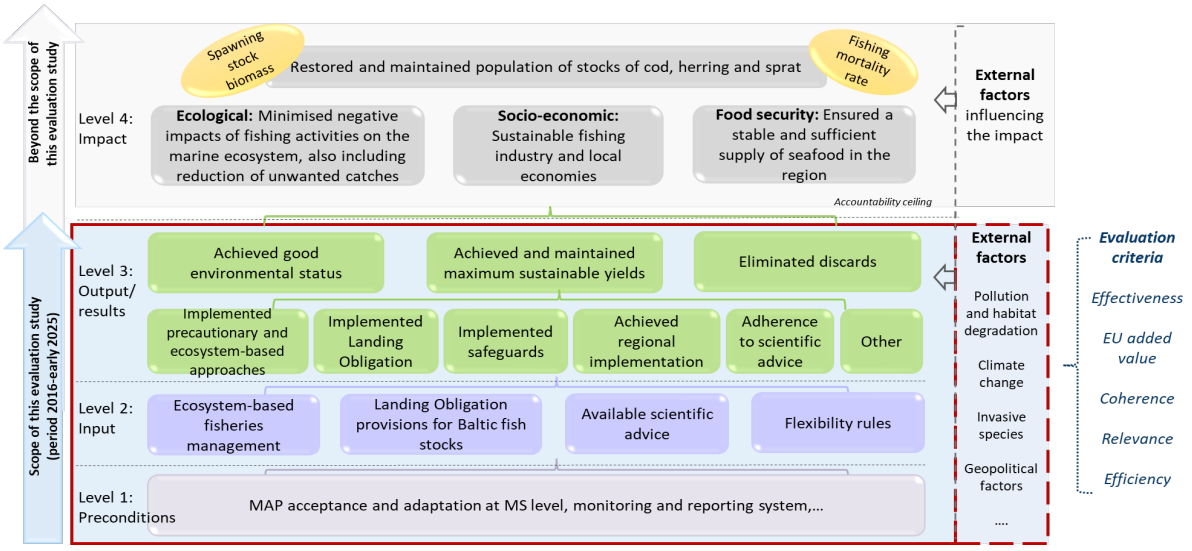
1.1. Impact model

The evaluation study started with the development of an impact model[8], a visual representation of the causal chain that drives effectiveness (see Figure 1). This model outlines the network of actions, outcomes and impacts that contribute to the plan's success. The model also facilitated the development of the evaluation design, providing a structured approach for organising and assessing the Baltic MAP's effectiveness, efficiency, coherence, relevance and EU added value.

This model captures the **impact chain of the Baltic MAP** across four distinct levels.

- Level 1: Preconditions for a successful Baltic MAP
- Level 2: Inputs
- Level 3: Output and results
- Level 4: Impacts

Figure 1 – Schematic impact model of the Baltic MAP implementation



Source: M&E Factory 2025

[7] A theory-based approach evaluation describes what happened, seeking to understand *why* and *how* certain outcomes were achieved or not, by linking activities and interventions to causal mechanisms (causal chain or theory of change).

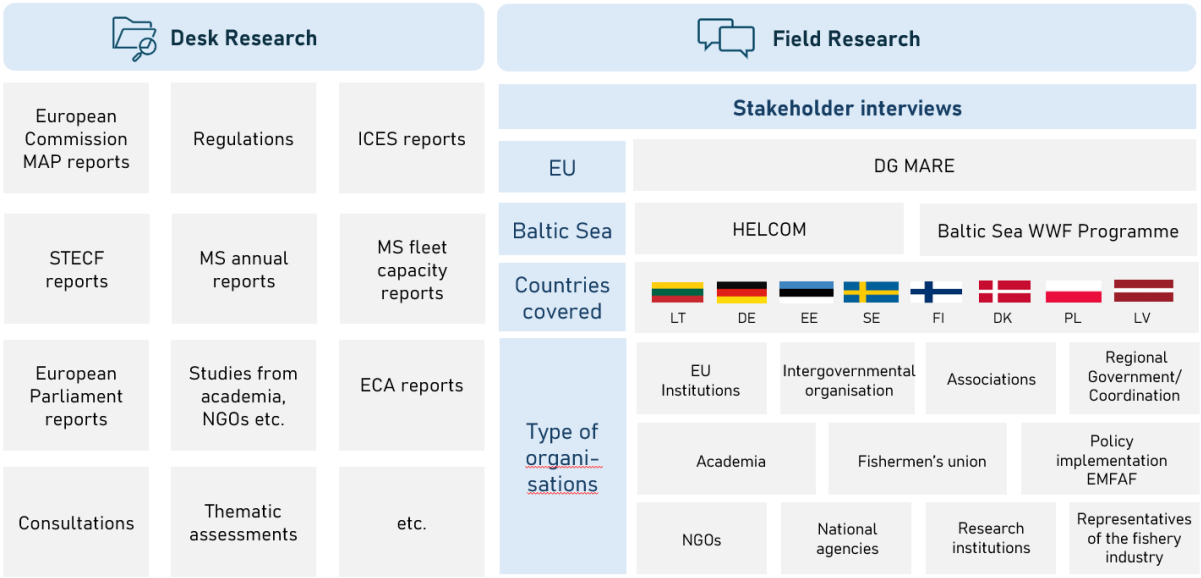
[8] The impact model is a dynamic representation of the intended and unintended consequences of the Baltic MAP, illustrating the causal chain of its implementation.

Given the study's scope and timeline, it **primarily focused on the first three levels of the impact model** to assess whether these are sufficient to achieve the Baltic MAP's intended impacts (Level 4) (see Figure 1). This comprehensive assessment offers insights into the implementation of the Baltic MAP and identifies areas for potential improvement.

1.2. Desk and field research

The evaluation team employed a mixed-methods approach, combining desk and field research (see Figure 2).

Figure 2 – Overview of data collection



Source: M&E Factory 2025

Desk research: The desk research involved collecting relevant information along the evaluation matrix (and evaluation questions), performing initial analyses and creating an overview of available information. The findings are presented in the following chapter titled "Findings".

A detailed list of reviewed documents is available in Annex 1: List of references.

Field research (interviews): To address the gaps in desk research and especially to gather diverse perspectives on the evaluation questions, the evaluation team, supported by country-specific experts, conducted interviews with 22 national, regional and EU stakeholders. These include representatives from the European Commission (DG MARE), academia, associations, national and regional governmental and coordination bodies, policy implementation bodies, representatives of the fishing industry, NGOs and research institutions. At least one interview was conducted in each of the Baltic Member States. In coordination with the EPRS and country experts, relevant stakeholders were identified, taking into account specific national contexts and, in some cases, stakeholder availability and expertise. Thus, in some countries (e.g. Germany, Poland, Sweden), at least two interviews were conducted.

A list of interviewees is provided in Annex 2: Interview partner organisations, along with a list of indicative interview questions prepared for each type of stakeholder.

1.3. Challenges and limitations

Overall, the evaluation study proceeded as planned and addressed the scope of its assessment. A few challenges or limitations include:

- **Study scope and timeline:** Given the study's timeline (mid-March to July 2025), the evaluation primarily focused on the first three levels of the impact model to assess whether these are sufficient to achieve the Baltic MAP's intended impacts (see Figure 1). A comprehensive assessment of the MAP's broader impact in the region would, by its nature, demand a longer duration.
- **Data timeliness:** For a few indicators (e.g. "state of Baltic Sea pressures and biodiversity 2016–2021", "number of cases with TAC set above ICES advice" from HELCOM; "fleet capacity, fishing effort, employment and economic indicators" from STECF), the most recent data extended only to 2021. However, the analysis was complemented by data gathered through interviews (e.g. stakeholders' views on the Baltic Sea's environmental status), or recent data from other sources like ICES, where available. Should updated data become available before autumn 2025, the evaluation team can incorporate them for the planned presentation at the PECH committee, as appropriate.
- **Stakeholder availability:** Engaging relevant experts and organisations for interviews presented occasional challenges, primarily due to their demanding schedules. However, the evaluation team successfully consulted the majority of planned stakeholders across the Baltic Sea Member States, with the sole exceptions being consumer organisations and two public institutions in Sweden (see Annex 2). Despite repeated outreach, consumer organisations either did not respond or declined participation due to limited resources. The Swedish institutions cited scheduling constraints.
- **Stakeholder perspectives:** The Baltic Sea fisheries sector comprises a diverse set of stakeholders with varying perspectives and interests. To ensure balanced representation, the evaluation's data collection – especially interviews – included a mix of stakeholders from national, regional and EU levels. All input received was considered in line with the study's objectives. When interviewees lacked sufficient information on specific topics or preferred not to be quoted, their input was excluded from the report. On the other hand, unique insights from individual stakeholders – when relevant to the study – were included, even if they pertained to specific Member States rather than the entire region.

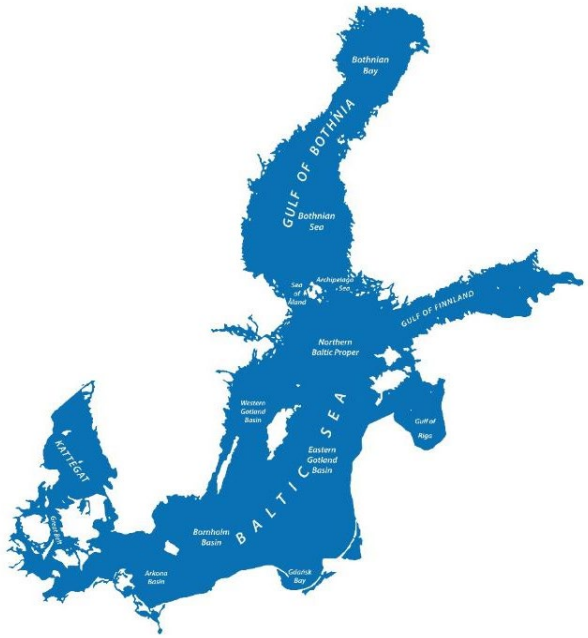
2. The Baltic Sea

2.1. Main characteristics

The Baltic Sea is one of the largest brackish water[9] areas in the world, covering an area of approximately 420 000 square kilometres. More than one-third of the sea is shallower than 30 meters. This results in a relatively small total water volume compared to its surface area.[10]

The Baltic Sea's unique characteristics stem from its relative isolation from other seas and lack of tides, which lead to a very slow exchange of water with other seas. Marine water from the North Sea primarily flows in during winter storms, while numerous rivers supply freshwater. These flows contribute to the characteristic brackish water gradient of the Baltic Sea. The sea exhibits strong temperature and salinity gradients, ranging from relatively warmer and saline waters in the southwestern part to cold and nearly freshwater conditions in the northernmost parts.

Figure 3 – Baltic Sea



Source: European Parliament © Image used under license from Adobe Stock[11]

[9] "Brackish water is water that is saltier than fresh water, but not as salty as seawater. It may result from mixing of seawater with fresh water, as in estuaries, but also certain human activities can produce brackish water, in particular certain civil engineering projects such as dikes and the flooding of coastal marshland...." Source: European Environment Agency. Brackish water. European Environment Agency, Brackish water, website

[10] L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

[11] European Parliament, Committee on Fisheries, State of Play of the Implementation of the Multiannual Plan (MAP) for the Baltic Sea (Hearing 23 January 2023), Brussels, 2023

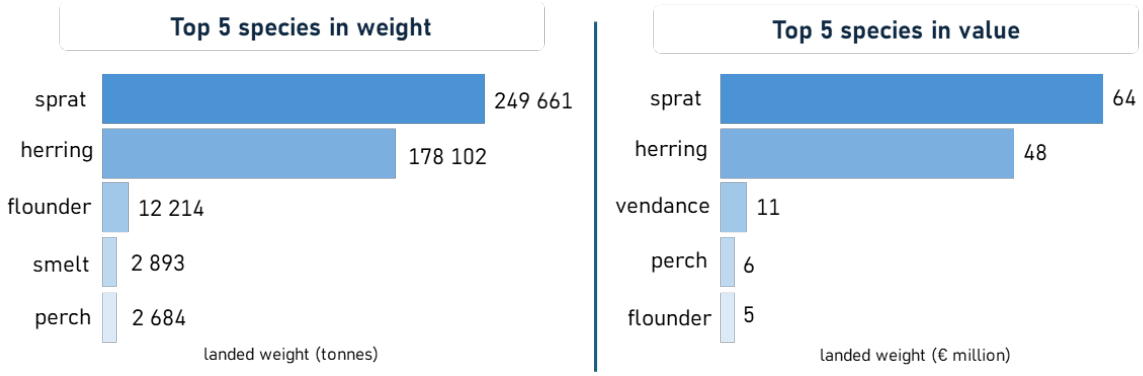
These distinctive environmental conditions create specific habitats, resulting in the Baltic Sea's unique **biodiversity.** The Baltic Sea's low salinity generally leads to a lower number of species compared to most other seas. However, its unique salinity gradient and wide range of habitat types allow for a greater range of biodiversity than its conditions might suggest.[12] Approximately 100 fish species inhabit the Baltic Sea, with about 70 marine species predominating in the Baltic Proper, the main basin, and around 30 freshwater species found in the coastal and innermost areas.[13]

Nine countries border the Baltic Sea[14]: eight Member States (Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland, Sweden) and Russia. Fisheries activities for the EU Baltic coastal states are regulated by the Common Fisheries Policy (CFP) and related CFP Regulation (EU) No 1380/2013[15]. The Baltic Sea Member States are highly dependent on the region's fisheries, primarily targeting herring, sprat and cod.

Cod, herring and sprat are the most commercially valuable marine fish species in the Baltic Sea, which are also regulated by the Baltic MAP. Other targeted species include flounder, smelt, perch and salmon. Sprat consists of a single stock, cod is divided into eastern and western Baltic stocks, and herring into western herring, central Baltic herring, Bothnian herring, and Gulf of Riga herring.

Sprat and Atlantic herring were the most significant species by weight of landings in 2022. Together, they comprised over 90 % of the total Baltic landings by weight, with sprat accounting for 54 % of the total landed weight (~249 700 tonnes) and herring for 38 % (~178 100 tonnes). Sprat also generated the highest value (€64 million), followed by herring (€48 million)(see Figure 4 below).[16]

Figure 4 – Top species in landed weight & value by MS fleets operating in Baltic Sea, 2021[17]



Source: STECF, the 2024 Annual Economic Report on the EU fishing fleet

12 HELCOM, Biodiversity, website

13 HELCOM, Basic Facts, website

14 Norway is nearby and part of the broader drainage basin, but it does not have coastlines on the Baltic Sea itself

15 HELCOM, Basic Facts, website

16 R. Prellezo et al., The 2024 Annual Economic Report on the EU Fishing Fleet (STECF 24-03 & 24-07), STECF, 2024

17 The figure shows the top five species by weight and value, landed by Member State fleets operating in the Baltic Sea for 2021. Data for other species with significantly lower values are not included but can be found here: R. Prellezo et al., The 2024 Annual Economic Report on the EU Fishing Fleet (STECF 24-03 & 24-07), STECF, 2024

Under the Common Fisheries Policy (CFP), ten stocks of five commercially important fish species in the Baltic Sea are managed using total allowable catches (TACs).

- **Six fish stocks** are targeted by fisheries, including sprat, central Baltic herring, Bothnian herring, Gulf of Riga herring, plaice and Gulf of Finland salmon.
- The other **four stocks**—western herring, eastern Baltic cod, western Baltic cod and main basin salmon—are not targeted and can only be landed as by-catch.[18]

This evaluation study focuses on the fish species (and related stocks) covered by the Baltic Sea MAP: sprat, cod and herring.

2.2. Baltic SEA Multiannual Plan and its amendments

The Multiannual Plan for the Baltic Sea (Baltic MAP) was established under Regulation (EU) 2016/1139 and **adopted in 2016,** being the first multiannual plan.

The Baltic MAP is a **regionalised implementation framework for the CFP,** designed to achieve the CFP objectives in the specific context of the Baltic Sea. The plan **aims to ensure the sustainable exploitation of key fish stocks, specifically cod, herring and sprat.** The MAP outlines objectives for achieving and maintaining maximum sustainable yield (MSY) for these stocks and establishes rules for setting fishing opportunities, thereby contributing to the broader goals of the CFP.

Since its adoption, the Baltic MAP Regulation (EU) No 2016/1139 has undergone a number of formal amendments. Below is a short summary of the amendments up to July 2025.

Amendment	Key changes to the Baltic MAP Regulation (EU) No 2016/1139
Regulation (EU) 2018/976[19]	**Amended the Baltic MAP to update fishing mortality reference points:** After concluding that the Bothnian Sea and Bothnian Bay herring populations were a single stock, ICES combined their separate TACs. As a result, the target fishing mortality ranges and conservation reference points were also updated.[20]
Regulation (EU) 2019/472[21]	**Established a multiannual plan for stocks fished in the Western Waters and made amendments affecting the Baltic MAP regulation.** Initiated the process of removing the "5 % rule" – Article 4(6), which required that fishing opportunities be fixed to ensure less than a 5 % probability of the spawning stock biomass (SSB) falling below Blim – favouring more a case-by-case approach rather than mandatory full closures. Note: *In December 2023, the European Commission proposed modifications to the existing MAPs (including the Baltic MAP), highlighting, among other things, that*

[18] European Parliamentary Research Service, Baltic Sea fishing area: Current challenges, 2025

[19] Regulation (EU) 2018/976 amending Regulation (EU) 2016/1139

[20] Commission Staff Working Document accompanying the first report on the implementation of the Baltic Sea Multiannual Plan, 2020, SWD(2020) 171 final

[21] Regulation (EU) 2019/472 establishing a multiannual plan for stocks fished in the Western Waters and adjacent waters, and for fisheries exploiting those stocks, amending Regulations (EU) 2016/1139 and (EU) 2018/973

Amendment	Key changes to the Baltic MAP Regulation (EU) No 2016/1139
	"applying the 5 % rule[22] could have severe socio-economic implications"[23] This proposal was rejected by the Parliament's Committee on Fisheries (PECH) on 23 September 2024.
Regulation (EU) 2019/1241[24]	**Supporting the development of a single, harmonized framework on technical rules across EU seas to minimise bycatch and ecosystem impacts** (e.g. stricter requirements for gear selectivity to reduce unwanted bycatch, closed or restricted areas to protect spawning and juvenile fish, minimum conservation reference sizes, etc.)
Regulation (EU) 2020/1781[25]	**Fishing capacity reduction and permanent cessation** as a response to scientific advice indicating alarming declines in the stocks of cod and herring, particularly Eastern Baltic cod, Western Baltic cod, Western Baltic herring.
Regulation (EU) 2023/2842[26]	**Updated/expanded fisheries control and monitoring provisions.** For example, shifting logbook provisions for vessels of an overall length of 8 metres or more engaged in targeted cod fishing (Article 12) to the Control Regulation (EC)1224/2009; or changing Article 13 with wider margin of tolerance (from 10 % to 20 % per species)

22 According to Article 4(6) of Baltic MAP Regulation, fishing opportunities shall in any event be fixed in such a way as to ensure that there is less than a 5 % probability of the spawning stock biomass falling below Blim. Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat

23 The Parliament's Committee on Fisheries (PECH) voted on 23 September to reject the Commission's proposal to remove essential safeguards for fish populations under MAPs for the Baltic Sea, North Sea, and Western Waters, Committee on Fisheries (PECH), Video, 2024; FishSec, PECH rejects attempt to remove safeguards in management plans, 2024

24 Regulation (EU) 2019/1241 on the conservation of fisheries resources and the protection of marine ecosystems through technical measures, amending Regulation (EU) 2016/1139 and other Regulations

25 Regulation (EU) 2020/1781 amending Regulation (EU) 2016/1139 as regards fishing capacity reduction in the Baltic Sea, and Regulation (EU) No 508/2014 as regards permanent cessation of fishing activities for fleets fishing for Eastern Baltic cod, Western Baltic cod and Western Baltic herring

26 Regulation (EU) 2023/2842 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control

3. Findings

This chapter presents the findings of the Baltic Sea MAP evaluation study based on desk research and interviews. Guided by the evaluation matrix and questions, experts reviewed relevant documents, reports, and data to address key evaluation questions and assess the Baltic MAP against five core criteria: **effectiveness, efficiency, coherence, relevance and EU added value.** The interviews served not only to complement the quantitative and qualitative data gathered through desk research but also to provide a more holistic perspective by incorporating insights from a diverse range of stakeholders.

The findings focus on:

- **Effectiveness:** The Baltic MAP's contribution to the Common Fisheries Policy objectives and Article 3 of the MAP, implementation of safeguards, and regional implementation.
- **Coherence:** Alignment with current Member State policy needs, EMFAF, and with year-to-year flexibility rules (CFP Regulation (EU) No 1380/2013, Article 15.9).
- **Efficiency:** Assessing streamlined processes, any national workload implications, stakeholder coordination, and the monitoring system.
- **Relevance:** Relevance of the Baltic MAP's objectives (Article 3) and its responsiveness to a changing environment.
- **Added value:** Contribution of the EU framework and the Baltic MAP in accelerating progress and enhancing the quality of achieving Good Environmental Status (GES), regionalised management and reduced discards compared to a scenario without such a framework or plan.

The following sections provide a summary of the main findings. The green symbol [✓] indicates aspects that are working well, while the red pen [✎] indicates those that require improvement.

3.1. Effectiveness: Achievement of the Baltic MAP objectives

Key findings on the effectiveness of the Baltic MAP	
Contribution to the Common Fisheries Policy objectives and Article 3 of the Baltic MAP	
✎	Despite the CFP Regulation and Baltic MAP aiming to restore and maintain commercial fish stocks above MSY levels, **several Baltic fish stocks, especially cod and herring, remain below biomass reference points, indicating compromised reproductive capacity.** There is a widespread concern among stakeholders that MSY-based models and related Total Allowable Catch (TAC) settings have not adequately accounted for rapid changes in marine ecosystem dynamics. Stakeholders highlight challenges in mixed fisheries, the rigid quota negotiation process, and the need for broader ecological considerations, including predator impacts and multi-species modelling, suggesting a shift towards more adaptive and precautionary management.

	**While the precautionary approach to fisheries management has been applied to severely depleted stocks like cod, inconsistencies remain,** notably with central Baltic herring where TACs have sometimes exceeded scientific advice despite warnings of uncertain recovery. Stakeholders highlight the need for a more stringent and consistently applied precautionary approach to restore ecosystem health and enhance climate resilience.
	A significant **narrowing of the gap between TACs and ICES advice** has occurred over the past two decades, with improvements seen especially after 2016, following the adoption of the MAP. However, data show that adherence to available scientific advice in the Baltic Sea fisheries management is not always consistent. By 2021, around 30 % of TACs were still set above ICES advice. Discrepancies also continued in recent years (e.g. Council's decision on central Baltic herring TACs against ICES advice for 2024), highlighting conflicts between environmental sustainability and socio-economic concerns. Stakeholders also advocate for greater transparency, earlier engagement in advice formulation, and improved scientist-fisher cooperation for better data collection.
	**The Baltic Sea's environmental state, particularly concerning its fish stocks, shows little to no improvement and has, in some aspects, worsened.** This directly compromises the sustainable role of fisheries and broader ecosystem functions. While stakeholders' views on the MAP's contribution to reduced fishing pressure vary, they agree that **non-fishing mortality factors –** such as eutrophication, hazardous substances, misreporting – continue to hinder stock recovery and the achievement of Good Environmental Status (GES).
	**Although the Baltic MAP formally includes ecosystem-based fisheries management, stakeholders widely agree that it has failed to effectively integrate marine environmental challenges.** They note that while implementing a true ecosystem-based approach is complex and requires higher data demands, it is crucial for long-term sustainability and healthy fish stocks. Moreover, its implementation faces barriers from economic and political interests that tend to prioritize short-term considerations over long-term ecosystem sustainability.
	**The effectiveness of the Landing Obligation (LO) in the Baltic Sea remains hampered by its weak implementation,** primarily due to insufficient enforcement, monitoring issues and challenges with the overall compliance regarding legal versus illegal discarding. This is further compounded by a complex LO regulatory framework that that creates practical difficulties for fishers. Moreover, stakeholders perceive that the Margin of Tolerance in the Baltic MAP Regulation (permitted discrepancy between the weight of fish catches recorded in fishing logbooks and the actual landed weight) has provided an incentive to misreport catches, leading to poor scientific stock assessment of fish stocks such as herring.
	Between 2016 and 2021, the **Baltic Sea fisheries** sector experienced a steep **decline across key indicators –** fleet capacity shrank by 25 %, employment fell by 28.5 % and profitability

	plummeted, with Small-Scale Coastal Fleet (SSCF) suffering the most. These trends reflect stakeholder concerns about the MAP effectiveness in managing Baltic Sea fisheries, particularly given that the SSCF, representing over 90 % of the fleet, reportedly receives only 7 % of the total catch. Unstable and fluctuating political decisions on fishing opportunities also hinder the sector by preventing long-term planning, investment, and deterring young people from entering an unpredictable sector.
Implementation of safeguards	
	Baltic Sea Member States have implemented various **safeguard measures** under the Baltic MAP to address the decline of Baltic MAP fish stocks such as various fishing bans, gear restrictions and seasonal closures to protect spawning stocks. Stakeholders, however, note various challenges in their implementation and effectiveness, such as ill-timed measures and enforcement issues.
Regional implementation of the Baltic Sea MAP	
	The MAP provides the **legal framework for enhanced regional cooperation,** particularly via joint recommendations/proposals and consultations with advisory councils and other stakeholders at different levels. However, stakeholders report that **regionalisation has not fully met expectations.** Key challenges include limited resources and time for preparing joint recommendations and adopting delegated acts, a lack of formal structures and clear processes for regional platforms, the need for stronger coordination between regional platforms, and diverging national interests – further compounded by geopolitical disruptions such as the Russia's war of aggression against Ukraine.

3.1.1. Contribution to the objectives of the Common Fisheries Policy (CFP) and objectives defined in Article 3 of the Baltic MAP

The objectives of the 2013 Common Fisheries Policy (CFP) are laid out in Article 2 of the CFP Regulation (EU) No 1380/2013.[27] Its overall objectives are to ensure that fishing and aquaculture activities are managed for long-term environmental sustainability, while also providing economic, social, and employment benefits and contributing to the availability of food supplies.[28] As stated in Article 2 (2) of the CFP Regulation[29], "the CFP shall apply the precautionary approach to fisheries management, and shall aim to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield." In addition, Article 2 (3) the CFP Regulation mandates the implementation of an ecosystem-based approach to fisheries management to minimise the negative impacts of fishing

27 CFP Regulation (EU) No 1380/2013

28 European Parliament, The common fisheries policy: origins and development, 2025

29 CFP Regulation (EU) No 1380/2013

activities on the marine ecosystem and ensure that both fisheries and aquaculture avoid degrading the marine environment.

In line with the CFP Regulation, Article 3 of the Baltic MAP outlines the plan's objectives, particularly by applying the **precautionary approach** and aiming to maintain harvested species **above maximum sustainable yield (MSY) levels.** The plan also seeks to eliminate discards by avoiding unwanted catches and implementing the **landing obligation (LO).** Furthermore, it aims to apply an **ecosystem-based approach** to fisheries management, minimising negative impacts on the marine ecosystem and ensuring coherence with Union environmental legislation, especially the objective of achieving **Good Environmental Status (GES)** as defined in the Marine Strategy Framework Directive (2008/56/EC).

The following sections highlight the main findings regarding the contribution to the CFP objectives and objectives defined in Article 3 of the Baltic MAP.

Restoring and maintaining fish stocks above MSY levels

Concerns regarding the poor conditions of the Baltic MAP stocks are widely shared by various stakeholders, notably drawing upon ICES assessments.

The International Council for the Exploration of the Sea (ICES) has repeatedly expressed concerns over the status of the Baltic stocks, stressing that the likelihood for the stocks slipping below a critical level was too high, even with no fishing.[30] Researchers at the Stockholm University Baltic Sea Centre highlighted that for example two of the four herring stocks faced a high probability of falling below the crisis level in 2025, even with no fishing pressure in 2024. [31] Further, the ICES overviews in December 2024 reported that the spawning-stock biomass (Blim[32], Bpa[33], MSY Btrigger[34]) of both cod stocks and several herring stocks remained below the reference limit[35], despite most Baltic stocks being fished at or below FMSY[36] (only sprat fishing mortality is above FMSY).[37] Various NGOs

[30] ICES, Cod (Gadus morhua) in subdivisions 22-24, western Baltic stock (western Baltic Sea), 2025; ICES, Herring (Clupea harengus) in subdivisions 20–24, spring spawners (Skagerrak, Kattegat, and western Baltic), 2025; ICES, Herring (Clupea harengus) in subdivisions 20–24, spring spawners (Skagerrak, Kattegat, and western Baltic), 2024; ICES, Baltic Fisheries Assessment Working Group (WGBFAS), Volume 5 | Issue 58 ICES Scientific Reports, 2023; ICES, Herring (Clupea harengus) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea), 2023, other ICES advice can be found here: ICES Advice 2024, ICES Advice 2025

[31] C. Berkow, Playing roulette with fish stocks sustainably, Stockholm University Baltic Sea Centre, Stockholm University Baltic Sea Centre, 2024
C. Berkow, Analysis: Weakening the management of Baltic fisheries, Stockholm University Baltic Sea Centre, 2024

[32] The biomass limit, below which reproduction may be impaired, meaning the stock could collapse or being permanently reduced in productivity. Falling below Blim means that the fishery irrevocably should be stopped.

[33] Bpa is a precautionary reference point for spawning stock biomass (SSB); ICES, Acronyms and terminology

[34] Biomass trigger is a reference point for spawning stock biomass (SSB) of a fish stock; ICES, Acronyms and terminology

[35] ICES, Baltic Sea ecoregion – fisheries overview, Report of the ICES Advisory Committee, 2022

[36] Fishing mortality consistent with achieving Maximum Sustainable Yield (MSY); ICES, Acronyms and terminology

[37] Member States' reports (Fleet capacity report for Estonia 2023; Fleet capacity report for Finland 2023

and the Commission[38] further corroborate these warnings, emphasising the risk of the stocks falling or remaining below Blim would exceed 5 %, contrary to what Article 4(6) of the Baltic MAP requires.

In this context, various stakeholders raise concerns about the **efficacy and applicability of the MSY and associated Total Allowable Catch (TAC) settings,** highlighting several key issues:

- **Mixed fisheries challenges and need for a more adaptive approach:** Baltic Sea Advisory Council (BSAC) members expressed disappointment with the MAP results, citing its failure to effectively increase TACs at MSY and address complex cases like cod and western herring, suggesting a need for revision towards a more adaptive approach.[39] They argue that the objective of reaching MSY levels has posed more problems than anticipated, especially regarding catch accountability in areas with mixed fisheries[40] and in cases where stock fluctuations are not caused by fishing. They suggest that the MSY principle should be better adapted to the current situation in the Baltic, including data on fishing mortality, and greater flexibility.[41] Likewise, the Commission acknowledges, in its second report,[42] the challenges of applying MAP rules in the context of mixed fisheries with increasingly weak stocks. The Danish Fishermen's Association also considers the approaches to FMSY to be too rigid and misguided.[43] This ongoing issue of an ambiguous FMSY is not new. It reflects a historical debate from the 2013 CFP reform that resulted from a political process marked by complex EU legislative negotiations and reinterpretations of scientific concepts; for example, shifting from a strict interpretation of the FMSY as an absolute ceiling and not a target or a range (the European Parliament's initial proposal) to the current more flexible interpretation.[44]
- **Quota negotiation process:** The BSAC criticises the quota negotiation process, noting that the scientifically recommended quotas and negotiations became a legal

[38] WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023; European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023; Baltic Waters, Deep dive: Ecosystem-based fisheries management – utopia or opportunity?, 2024

[39] BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, 2024

[40] CFP Regulation (EU) No1380/2013, Article4(1)(36): (36) 'mixed fisheries' means fisheries in which more than one species is present and where different species are likely to be caught in the same fishing operationhttps://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02013R1380-20230101

[41] BSAC, White Paper Implementation and revision of the CFP with a Baltic perspective, report, 2022

[42] Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

[43] Danmarks Fiskeriforening, Situationen i Østersøen kalder på handling og samarbejde, 2021; Danmarks Fiskeriforening, Danskerenes Fiskere, 2023

[44] M. Earle, Maximum sustainable yield in the EU's Common Fisheries Policy – a political history, ICES Journal of Marine Science, 78, Issue 6, September 2021
European Commission's and European Parliament's proposals: Multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, 2015

tug-of-war rather than focusing on creating healthy fish stocks.[45] Views from the fishing industry on the MSY approach are predominantly critical, while the environmental organisations believe that it allows too much fishing on vulnerable stocks, even above the MSY level[46]. On the other hand, the Danish Producer Organisation focused on pelagic fishing (DPPO) believes the Baltic MAP, by utilising FMSY upper and lower intervals, allows policymakers a broader approach to quota setting while staying within ICES's sustainable fishing interval. They suggest, however, re-evaluating whether FMSY intervals reflect updated scientific advice and understanding of these stocks. Researchers at the Stockholm University Baltic Sea Centre[47] suggest shifting the quotas/target from fully achieving MSY to a more precautionary approach (a proportion of MSY or even lower) that may support more stable and sustainable yields over time.[48] (*The precautionary approach is further explored in the subsequent section*.)

Moreover, the BSAC proposes that recreational fishing catches be included in Member State quotas for selected stocks, particularly where a significant portion of the catch is taken by recreational fishers.[49] While Member States are not unanimous on this matter due to the challenges in quota allocation, the BSAC recommends further discussion before such an approach is implemented.

- **Broader ecological considerations:** The Swedish Fish Producer Organisation (SFPO) interviewed welcomes the ICES's risk tables but criticises the narrow focus on MSY. They argue that maximising MSY for all species simultaneously is unsustainable, and that ICES should develop more and better models, including multi-species models that account for species interactions and predators (such as seals and cormorants, whose growing populations significantly impact fish stocks and fishing equipment). They also propose a shift from biomass-based targets to size-based catch limits, arguing it would aid regeneration and prioritise food production over industrial use[50]. They suggest modifying the Baltic MAP objectives, calling for optimisation rather than maximisation of MSY (e.g. if herring is maintained at level X, salmon can be sustained at level Y). Likewise, researchers at the Stockholm University Baltic Sea Centre[51] question the MSY approach to fisheries management, arguing it focuses solely on the fishing benefits while neglecting negative aspects such as bycatches, discards, and ecological complexities. They reiterate long-standing concerns about the

45 BSAC, BSAC reply to the European Commission open feedback on the proposed changes to the Baltic Multiannual Plan (MAP), BSAC report, 2024

46 Interview with the WWF Baltic Sea Programme, April-June 2025

47 Interview with SE Stockholm University Baltic Sea Centre, April-June 2025

48 Interview with SE Stockholm University Baltic Sea Centre, April-June 2025

49 BSAC, White Paper Implementation and revision of the CFP with a Baltic perspective, report, 2022

50 Larger herrings are used as food for people; small herrings are used as animal feed or fish meal

51 Interview with SE Stockholm University Baltic Sea Centre, April-June 2025

impossibility of achieving MSY in mixed fisheries[52], limitations of single-species FMSY in multispecies ecosystems with predation and competition, the obscure and changing nature of stock-recruitment relationships, and the impact of density-dependent catchability on effort and cost.[53]

- **National institutions** (including ministries and institutes) from the Baltic Member States generally support the MAP, particularly concerning MSY and stock safety levels.[54] While the MSY objectives for spawning stock biomass remain unachieved for many stocks[55], the MAP offers a more predictable framework for fisheries quota policy-making compared to the previous annual European Council negotiations, which frequently resulted in overly large quotas.[56] However, the national authorities advocate for greater flexibility and a more holistic approach to fisheries management. They argue against overemphasising MSY while overlooking crucial factors such as predators (seals, cormorants) and changing environmental conditions (e.g. warming seawater, pollution, etc.), which are significant contributors to stock reduction. As stressed by the German Ministry for Food and Agriculture, the MSY concept remains relevant but is not a cure-all, and non-fisheries-related causes of mortality must be more systematically integrated into scientific stock assessments. Moreover, the Lithuanian Ministry of Agriculture recommends reviewing the applied FMSY range limits to avoid quota fluctuations from year to year. The Finnish Ministry of Agriculture and Forestry also caution that scientific advice changes annually and that open questions remain about the quota setting process (e.g. who is responsible, powers the Council has and what quotas it can set, and how detailed proposals the Commission should give).
- **Reliability of scientific data and forecasting tools** such as the inadequate detection of changes in fish stocks and their reflection in stock assessment models, alongside perceived shortcomings in scientific forecasts meeting necessary standards[57]: While the MSY goal remains relevant, it is not a "cure-all" solution. Non-fishing-related sources of mortality need to be examined more closely and better integrated into scientific stock assessment models. Given constantly evolving environmental

[52] One example from the interview with SE Stockholm University Baltic Sea Centre, April-June 2025 *"In the Baltic, mixed fisheries targeting both herring and sprat complicate monitoring. Much of the catch goes to industrial use (fish meal and oil), and even honest skippers struggle to correctly estimate species proportions, as herring and sprat look very similar."*

[53] Interview with SE Stockholm University Baltic Sea Centre, April-June 2025

[54] Interview with EE Ministry of Regional Affairs and Agriculture, Interview with LT Ministry of Agriculture, Interview with DE Ministry for Food and Agriculture, FI Ministry of Agriculture and Forestry, LV Ministry of Agriculture, LV Institute of Food Safety, Animal Health and Environment "BIOR", April-June 2025

[55] Interview with EE Ministry of Regional Affairs, April-June 2025

[56] Interview with FI Ministry of Agriculture and Forestry, April-June 2025

[57] Interview with DE German Fisheries Association, April-June 2025

conditions, striking a healthy balance between ecological objectives and realistic management measures is essential.[58]

Precautionary approach to fisheries management

Applying a precautionary approach to fisheries management, in accordance with the CFP Regulation (EU) No 1380/2013, means exercising greater caution when scientific information is limited[59]. ICES provides the best available scientific advice for all stocks, including the three Baltic MAP stocks: cod, herring and sprat. When sufficient information is available, ICES advises on catch limits based on achieving the MSY. If data are limited, their advice is based on the precautionary approach.

For Baltic fish stocks in a critical or highly uncertain state, the precautionary approach often translates into recommendations for zero or very low TACs, or restrictions to by-catch only.

- **Eastern and western Baltic cod stocks** have consistently received precautionary advice for several consecutive years due to their severely depleted status[60], with the ICES issuing zero catch advice or only small bycatch[61]. Reflecting their poor condition and aligning with both the Commission's proposals and ICES advice, TACs for 2023–2025 for both stocks have been limited exclusively to by-catch. For 2025, the Council also agreed with the Commission's proposal to prohibit all recreational cod fishing in the Baltic Sea, while considering incidental by-catches.[62]
- **TACs for herring** for 2023 and 2024 showed significant reductions, particularly for Central Baltic Sea and Gulf of Bothnia herring. However, as noted in the BalticWaters report[63], the Council of Ministers' decision in 2023 to allow directed fishing for herring for 2024 went against the Commission's proposal and ICES advice[64], being inconsistent with the MAP requirement that fishing opportunities should in all circumstances be set in a way that ensures that there is less than a 5 % probability that

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58 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April–June 2025

59 CFP Regulation (EU) No1380/2013, Article 4 (8): "precautionary approach to fisheries management, as referred to in Article 6 of the UN Fish Stocks Agreement, means an approach according to which the absence of adequate scientific information should not justify postponing or failing to take management measures to conserve target species, associated or dependent species and non-target species and their environment."

60 European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023

61 ICES, Cod (Gadus morhua) in subdivisions 24–32, eastern Baltic stock (eastern Baltic Sea), 2024; ICES, Cod (Gadus morhua) in subdivisions 22–24, western Baltic stock (western Baltic Sea), 2023; European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023https://eur-lex.europa.eu/resource.html?uri=cellar%3A31b706ff-4581-11ee-9854-01aa75ed71a1.0001.02%2FDOC_1&format=PDF

62 Council of the European Union, Baltic Sea Council agrees on catch limits for 2025, press release, 22 October 2024

63 D. Langlet, Are EU fisheries ministers breaking the law?, BalticWaters, 2024

64 ICES issued zero or minimal catch advice for critically depleted stocks like eastern and western Baltic cod and central Baltic herring, ICES, Cod (Gadus morhua) in subdivisions 24–32, eastern Baltic stock (eastern Baltic Sea), 2024; ICES, Cod (Gadus morhua) in subdivisions 22–24, western Baltic stock (western Baltic Sea), 2023; European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023

the spawning stock biomass falls below Blim.[65] For 2025, the Council increased the TAC for central Baltic herring by 108 %, in line with the Commission's proposal.[66] This increase, however, has drawn criticism from scientists and NGOs, who view it as overly risky and not fully consistent with ICES advice, which warns that even without any fishing, recovery remains uncertain.[67] In contrast, Western Baltic herring is managed in line with ICES advice, with only unavoidable by-catch permitted since 2021, and targeted fisheries closed except for scientific and small-scale coastal fishing.[68]

- **In the case of sprat,** while the stock is not under a full precautionary zero-catch recommendation, the Commission has proposed cautious catch limits for 2025. Nevertheless, environmental NGOs[69] stress that the sprat stock's situation is highly concerning, with a significant population decline attributed, among other factors, to low recruitment rates (the number of fish surviving the first years of life). They urge fisheries ministers to set even lower TACs to prevent further depletion, emphasising that the health of prey fish stocks like sprat and herring is vital for the overall marine environment as they serve as the engine of the Baltic Sea ecosystem.

Furthermore, despite the application of the precautionary approach and the ICES issuing zero or minimal catch advice, **the 2024 and 2022 ICES Fisheries Overviews[70] revealed that many Baltic Sea stocks continue to be exploited unsustainably.** This includes fishing above FMSY or, under the precautionary approach, above Flim[71], or where the stock size is below Blim.

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65 For the central Baltic herring stock, the Commission proposed to allow no directed fishing and only low levels of unavoidable by-catch. The Council decided on a TAC of 40 368 tonnes for 2024. For the Gulf of Bothnia herring stock, the Commission proposed to allow no targeted fishing and only low levels of unavoidable by-catch. The Council decided on a TAC of 55 000 tonnes., D. Langlet, Are EU fisheries ministers breaking the law?, BalticWaters, 2024; Directorate General for Maritime Affairs and Fisheries, Baltic Sea: Agreement reached on 2024 fishing opportunities, news announcement, European Commission, 2023

66 Directorate General for Maritime Affairs and Fisheries, Baltic Sea: Agreement reached on 2024 fishing opportunities, news announcement, European Commission, 2023

67 Stockholm University Baltic Sea Centre, Fisheries experts on the Council's TAC decision: Too big risk – may be illegal, 2024; FishSec, A Baltic Sea in Crisis: Why EU Fisheries Ministers Must Apply the Precautionary Approach to Fishing Opportunities This Time, 16 October 2024

68 European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023https://eur-lex.europa.eu/resource.html?uri=cellar%3A31b706ff-4581-11ee-9854-01aa75ed71a1.0001.02%2FDOC_1&format=PDF

69 J. Zachjowska, Urgent call to action: protect Baltic Sea fisheries before it's too late, WWF Baltic Sea Programme, 2024; WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023

70 ICES, Baltic Sea ecoregion – fisheries overview, 2024; ICES, Baltic Sea ecoregion – fisheries overview, 2022

71 ICES, Acronyms and terminology: Limit reference point for fishing mortality (mean over defined age range): The limit reference point for fishing mortality Flim is the fishing mortality that that, if maintained, will drive the stock to Blim. This is exploitation rate that is expected to be associated with stock 'collapse' if maintained over a longer time

M.Heino etal., Can fisheries-induced evolution shift reference points for fisheries management?, ICES Journal of Marine Science, Vol.70(4), Oxford University Press, 2013

In this context, the HELCOM Secretariat and various NGOs[72] stress that the widespread application of the precautionary approach is crucial for preventing stock collapses and fostering healthier fish populations in the long term. This is particularly critical given the complexity of marine ecosystems, the uncertainties in scientific assessments, and the unprecedented degradation of the Baltic Sea, which is further exacerbated by climate-driven changes. In light of such pressures, NGOs stress the immediate need for a precautionary approach when setting TACs.[73] They see this as crucial for reducing pressure on biodiversity, fish populations and habitats, while also restoring marine food web and strengthening the Baltic Sea's capacity to mitigate and adapt to climate change.[74]

FishSec [75] has welcomed the Commission's proposal for 2025 fishing limits as a positive step but warns that it does not go far enough to ensure rebuilding of the important fish species. Given the uncertainties in stock assessments, ongoing declines in fish populations, misreporting and poor environmental conditions, fishing limits must include more precautionary buffers, including ecosystem considerations, as well as implement further remedial measures. The HELCOM Secretariat, however, notes that the **full application of precautionary approach is complex and necessitates an extensive discussion to clarify its practical application.**[76]

Adherence to available scientific advice

All measures under the MAP must be based on the best available scientific advice, with fisheries management measures nominally based on ICES advice. HELCOM data (see Figure 5) indicate a significant narrowing of the gap between TACs and ICES advice has occurred over the past two decades, particularly after 2016, following the MAP's adoption. However, despite this improvement, policymakers have not consistently adhered to scientific advice when setting TACs, contributing to ongoing overfishing pressures. By 2021, around 30 % of TACs were still set above ICES advice.

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72 WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023

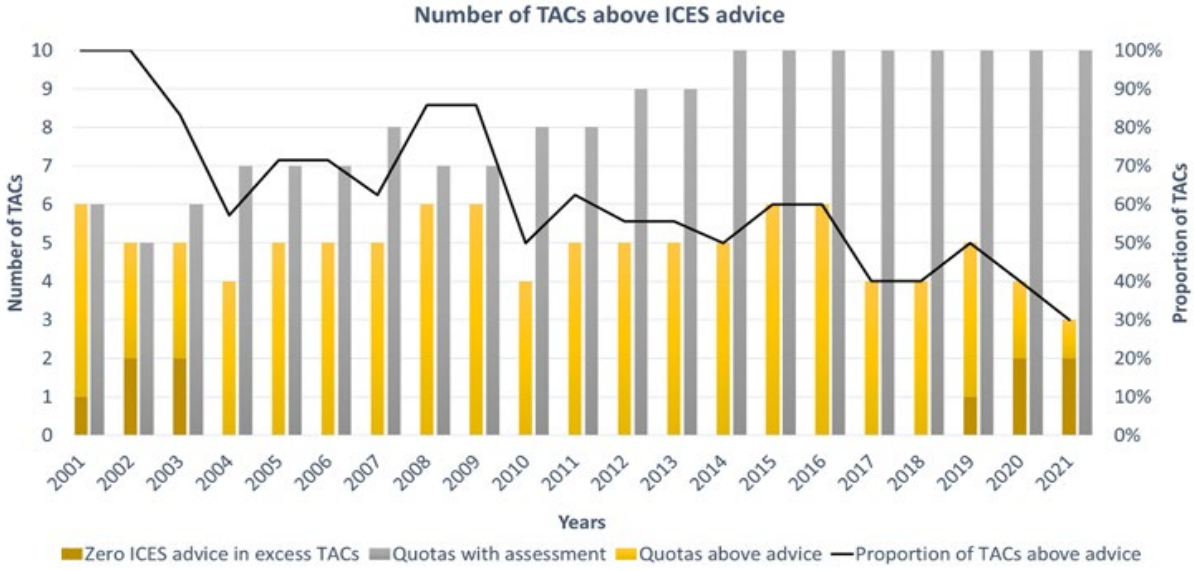
73 WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023

74 WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023

75 FishSec, A Baltic Sea in Crisis: Why EU Fisheries Ministers Must Apply the Precautionary Approach to Fishing Opportunities This Time, 16 October 2024

76 Interview with HELCOM Secretariat, April–June 2025

Figure 5 – Number of cases with TAC set above ICES advice for internationally managed fish stocks in the Baltic Sea during 2001-2021



Source: HELCOM 2023[77] Note: The figure does not include data from Russia. The stocks included are cod, herring, plaice, sprat and salmon. Cases in which ICES has advised zero catches, but a TAC was still set (cod subdivisions 24-32 and herring subdivisions 22-24) are highlighted in dark yellow.

Recent years also show cases of discrepancies between scientific recommendations and Council decisions, reflecting short-term conflicts between environmental sustainability and socio-economic concerns[78] (e.g. Council's decision on central Baltic herring TACs against ICES advice for 2024 as mentioned in the previous section).[79]

Moreover, stakeholders express other concerns regarding scientific advice in fisheries management. The BSAC members emphasise the need to broaden the scope of stakeholders' involvement in the formulation of advice requests to the Scientific, Technical and Economic Committee for Fisheries (STECF) and ICES.[80] They call for greater transparency in the Commission's request for scientific advice and early stakeholder engagement in the policy-making process when requests for advice are formulated. The BSAC also stresses the importance of dialogue and cooperation between scientists and fishers for effective data collection.

HELCOM highlights that nationally managed coastal fisheries face their own challenges, which further complicate the alignment with scientific advice, such as data deficiencies on the spatial and temporal patterns of commercial and recreational fisheries, insufficient regulation and compliance

[77] L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

[78] L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

[79] BalticWaters, Baltic Sea Brief 66, 2024; Stockholm University Baltic Sea Centre, Fisheries experts on the Council's TAC decision: Too big risk – may be illegal, 2024

[80] BSAC, BSAC recommendations for the fishery in the Baltic Sea in 2025, 2024

issues.[81] Moreover, the current discourse and data frequently focus primarily on overfishing, neglecting other ecological pressures affecting the broader marine environment (see also section "Ecosystem-based fisheries management", and "relevance" in section 3.4).

Good Environmental Status

Legal and strategy framework

The Marine Strategy Framework Directive (MSFD 2008/56/EC)[82] establishes the overarching goal of achieving Good Environmental Status (GES) in marine waters. GES is defined in simple terms as a condition in which marine waters are ecologically diverse, healthy, productive and sustainably used. It is assessed using 11 qualitative descriptors (Annex I, MSFD), with Descriptor 3: Commercial fish and shellfish, being the most directly applicable to fisheries. Descriptor 3 requires that populations of all commercially exploited fish and shellfish are maintained within safe biological limits and exhibit age and size distributions indicative of healthy stocks.

Member States are responsible for developing and implementing marine strategies to achieve or maintain GES within their waters (MSFD Art. 5). While the MSFD provides a framework and criteria for determining GES, **it leaves the specifics to be set by each Member State according to regional conditions, often in cooperation with regional sea conventions.** Member States are required to cooperate amongst themselves to ensure their marine strategies are coherent and coordinated, fostering a common approach to their implementation, such as to the assessment, GES determination, environmental targets, measures to achieve GES (MSFD Art. 5).

HELCOM (and its Baltic Sea Action Plan) serves as a vital coordination platform for regional MSFD implementation in the Baltic Sea, supporting harmonised national marine strategies for achieving GES.[83] HELCOM's holistic assessments and indicator manuals are directly used by Baltic countries to fulfil MSFD reporting requirements, as HELCOM's tools are designed to address MSFD descriptors and criteria, enabling countries to use regional data and methodologies for their national strategies.[84]

The CFP Regulation (Article 2.5.j)[85] **and Baltic MAP** (Article 3.3) explicitly refer to achieving or maintaining GES as a key objective, integrating environmental sustainability into fisheries management and regional marine policies. The Baltic MAP, as a regional multiannual plan for fisheries management, should ensure the sustainable exploitation of fish stocks in the Baltic Sea, aligning closely with **GES Descriptor 3** on commercial fish and shellfish. By regulating fishing pressure and

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81 L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

82 Directive 2008/56/EC Marine Strategy Framework Directive

83 HELCOM website, MSFD
EASME, CFP Regionalisation, (EASME/EMFF/2018/011 Lot 1 & 2), Final Report, 2022: HELCOM does not have decision-making competence with respect to fisheries governance in relation to CFP. It deals with environment issues having indirect and direct impacts on fisheries.

84 R. Strempel, HELCOM and the EU, 2024

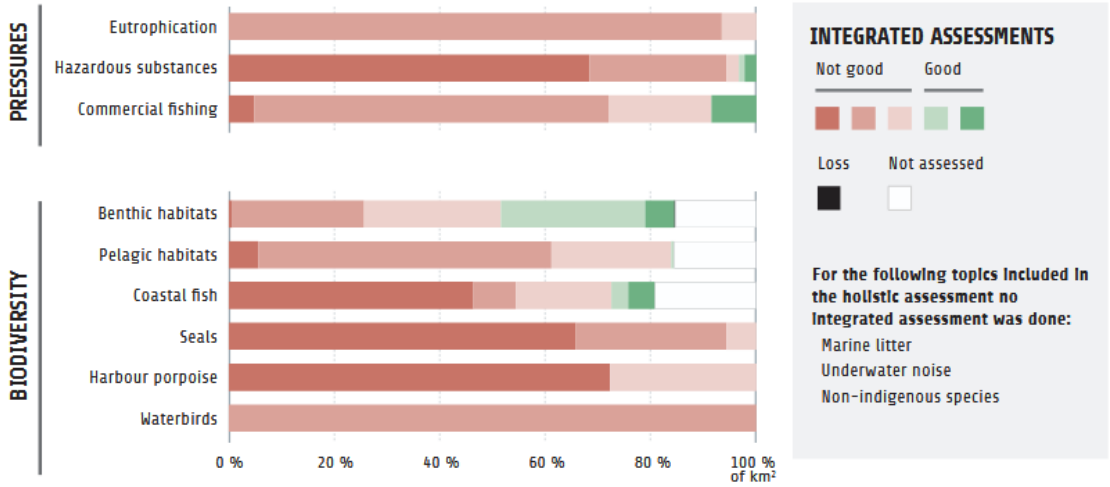
85 CFP Regulation (EU) No 1380/2013

protecting spawning areas, the MAP should help to restore and maintain healthy fish populations. The plan also aims to support ecosystem-based management by considering interactions between species and environmental pressures.

Environmental status in the Baltic Sea

Despite the existing EU and regional frameworks and measures, the HELCOM holistic assessment[86] shows little or no improvement in the Baltic Sea's environmental state during the period 2016-2021(see Figure 6). **Eutrophication and hazardous substances** remain key pressures (nearly the entire Baltic Sea area is assessed as "not good"). **Commercial fishing** shows some mixed results (majority is still "not good", but there is a small portion assessed as "good", suggesting some sustainable fishing practices). For key ecosystem components **(biodiversity) –** including pelagic and benthic habitats, fish, waterbirds and marine mammals – only a limited number of indicators met their threshold values in specific sub-regions of the Baltic Sea, with none achieving GES across all assessed areas (see Figure 6).

Figure 6 – State of Baltic Sea pressures and biodiversity 2016-2021



Source: HELCOM (2023)[87] Note: The figure summarises the results of integrated assessments of Baltic Sea's pressures and status. It illustrates the proportion of the Baltic Sea, based on square kilometres, in different assessment status categories. Results are presented in five categories: three to represent the degrees of poor status (not good) and two to represent degrees of good status.

[86] L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023; EuropeanCommission, Report on the Commission's assessment of the MS programmes of measures as updated under Article17 of the MSFD (2008/56/EC), COM(2025) 3 final, 4February2025

[87] L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

HELCOM data (see Figure 7 below) show a concerning trend in the state of several commercial fish **stocks,** including the Baltic MAP fish stocks like **cod and herring** populations**.** HELCOM alerts that this deterioration threatens the sustainable use of species in the Baltic Sea and impacts the profitability of fisheries and tourism, as well as a wide range of vital ecosystem services.

Figure 7 – Status of fish stocks in the Baltic Sea during 2016–2021

Species name	Scientific name	Stocks	Assessment approach	Fishing pressure		Stock size		Age/Size structure	Total
				Status	Trend	Status	Trend	Trend	
Pelagic species									
Atlantic herring*	*Clupea harengus*	Skagerrak, Kattegat, WB Baltic Spring spawners (SD 20-24)	MSY	■	→	■	↓	↑1	■
		Central Baltic Sea (SD 25-29 & SD 32)	MSY	■	↑	●	↓	→1	■
		Gulf of Riga (SD 28)	MSY	●	→	●	↑	→1	●
		Gulf of Bothnia (SD 30-31)	MSY	●	→	●	↓	→1	●
Sprat*	*Sprattus sprattus*	Baltic Sea (SD 22-32)	MSY	■	→	●	→	→1	■
Demersal species									
Atlantic cod*	*Gadus morhua*	Kattegat (SD 21)	PA	–	↑	■	↓	-	■
		Western Baltic (SD 22-24)	MSY	■	↓	■	↓	→1	■
		Eastern Baltic (SD 24-32)	PA	■	↓	■	↓	↓3	■

● positive status ■ negative status – no information

Source: HELCOM (2023)[88] *Note: The fish species are assessed by stocks, which are identified by their areal distribution. The numbers give the corresponding ICES assessment units (Subdivisions, SD). A stock's overall status is assessed by the condition that indicators of fishing mortality and stock size should both achieve their reference points, on average during 2016–2021. Symbols used: green – if the stock meets the set conditions; red – if it fails to meet such conditions; arrows – trends over the last decade. The applied assessment approach: MSY = analytical stock assessment based on the MSY, and PA = precautionary approach. Size or age structure was not evaluated against a threshold value; however, changes over the last decade are indicated using available data (1 = age structure, 2 = length structure, 3 = qualitative assessment based on ICES advice).*

More recent assessments (e.g. Commission's assessment of the MSFD[89], 2024 ICES assessments[90]) confirm the deteriorating status of the **commercial fish stocks** (especially the western and eastern Baltic cod), making the collection of adequate scientific data to monitor stock development and related environmental conditions increasingly challenging. European Anglers Associations (EAA) also share serious concerns about the deteriorating ecological status of the Baltic Seam, being vital

88 L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

89 EuropeanCommission, Report on the Commission's assessment of the MS programmes of measures as updated under Article17 of the MSFD (2008/56/EC), COM(2025) 3 final, 4February2025

90 ICES, Baltic sea ecosystem overview, 2024; ICES, Baltic Sea ecoregion – fisheries overview, 2024

an ecosystem for non-commercial recreational fishing.[91] The Commission's assessment[92] also echoes HELCOM's concerns regarding the environmental status of the Baltic Sea, highlighting key pressures like **eutrophication** (especially in central parts of the Baltic Sea), **hazardous substances,** as well as the **beach litter** (11 out of 16 sub-basins are above the threshold value of 20 litter items per 100m of beach[93]). **Biodiversity,** with several marine species and habitats, is also not assessed to be in a good status across the whole Baltic Sea. **Climate change,** particularly projected warming, is expected to exacerbate these impacts.

On national level, the Commission's assessment of the MSFD[94] and of national marine strategies mentioned that commercial fishing is targeted by all marine strategies of the Baltic Member States.[95] For example, Poland has included nutrient reduction measures to support cod recovery, recognising eutrophication as a key pressure. On the other hand, Lithuania's additional measures under the MSFD are deemed insufficient (or not clearly reflected in the reporting) and not directly relevant to cod, herring, sprat, with a particular need to address the poor age and size structure of herring.

Baltic MAP contribution to the GES and status of fish stocks in the Baltic Sea

Many of the stakeholders interviewed for this study note that the Baltic MAP fish stocks have not recovered since the implementation of the MAP and that the GES has not been achieved.[96] Furthermore, some BSAC members[97] even believe that the MAP has failed to facilitate the implementation of MSFD.

On the other hand, the Commission[98] notes that, despite the Baltic Sea's deteriorating marine environment and fish stocks, the MAP has contributed to a decrease in fishing pressure. The Baltic MAP Data Collection Framework is considered important and should continue.[99] Moreover, the

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91 What is Recreational Fishing? – Topics – EAA: Recreational fishing is fishing, which is not deemed to be commercial fishing, Europea Anglers Alliance, website
European Anglers Alliance, Casting concerns: EAA meets PECH Committee MEPs during the parliamentary mission to Denmark, 2025

92 EuropeanCommission, Report on the Commission's assessment of the MS programmes of measures as updated under Article17 of the MSFD (2008/56/EC), COM(2025) 3 final, 4February2025

93 European Commission, EU Member States agree on threshold value to keep Europe's beaches clean, websitehttps://ec.europa.eu/newsroom/eusciencehubnews/items/688749/

94 EuropeanCommission, Report on the Commission's assessment of the MS programmes of measures as updated under Article17 of the MSFD (2008/56/EC), COM(2025) 3 final, 4February2025

95 EuropeanCommission, Report on the Commission's assessment of the MS programmes of measures as updated under Article17 of the MSFD (2008/56/EC), COM(2025) 3 final, 4February2025; Webgate, CIRCABC, website

96 Interview with Baltic Sea stakeholders like WWF Baltic Sea Programme; Stockholm University Baltic Sea Centre, CCB, FishSec, April-June 2025

97 ICES, Baltic Sea ecoregion – Fisheries overview, 2021: Midwater, open-sea fish species that live away from the seabed. The pelagic fisheries, which account for the largest catches (by weight) in the Baltic Sea region, are the mid-water trawl fisheries for sprat and herring.

98 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

99 Interview the HELCOM Secretariat, April-June 2025

progress report of the Baltic Declaration[100] highlights some measures taken at EU, regional and national levels, mentioning among others conservation and management measures related to the Baltic MAP fish stocks such as adoption of annual fishing opportunities by the Council of the EU considering the best available scientific advice and in cooperation with BALTFISH and the BSAC, as well as the development of joint recommendations. Other measures include the development of more selective and less harmful fishing gear and practices in commercial fishing.

However, the Commission[101] also highlights that the mortality factors other than fishing now predominantly affect some stocks, notably cod and several herring populations, which remain at concerningly low levels. This deterioration occurs within a fundamentally changing and unbalanced Baltic Sea ecosystem, further compounded by potential misreporting of pelagic catches[102] and Russia's autonomous TAC setting that disregards MSY and scientific advice. [103]

The Commission and HELCOM[104] agree that **regional management instruments and measures to reduce pressures on the Baltic marine environment show effectiveness when properly implemented.** For instance, regional agreements have contributed to reduced nutrient inputs to sustainable levels in some areas, and problematic hazardous substances are now at lower concentrations. [105] Furthermore, efforts in biodiversity conservation have increased, putting the Baltic Sea on track to achieve the global target of 30 % protected area by 2030.[106] These coordinated actions are crucial for the long-term recovery of the Baltic ecosystem.

Coordination and enforcement mechanisms

The World Wide Fund for Nature (WWF)highlights that while the MSFD looks good on paper 'setting a shared foundation to define what a healthy marine environment looks like', 'the absence of legally binding targets allows Member States to choose their own approach to ocean protection – too often, with disappointing results'.[107] Thus, as widely stressed by interviewed stakeholders, **achieving GES extends beyond the Baltic MAP,** requiring broader coordination and coherence with other EU, regional, and national frameworks and measures.

Some efforts have been made to increase regional cooperation in the Baltic Sea, including through and between regional platforms like BALTFISH, HELCOM and the BSAC (e.g. sharing information

100 European Commission, Our Baltic declaration – First progress report on commitments, September 2023

101 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

102 Midwater, open-sea fish species that live away from the seabed. The pelagic fisheries, which account for the largest catches (by weight) in the Baltic Sea region, are the mid-water trawl fisheries for sprat and herring., ICES, Baltic Sea ecoregion – Fisheries overview, 2021

103 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

104 L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

105 L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

106 EuropeanCommission, Report on the Commission's assessment of the MS programmes of measures as updated under Article17 of the MSFD (2008/56/EC), COM(2025) 3 final, 4February2025

107 WWF, New Commission report shows EU marine laws lack binding measures, 2025

and reciprocal attendance in meetings by each organisation).[108] This reflects the Commission's assessment that the inclusion of GES in decision-making is "moderately coherent" within marine regions, with the Baltic Sea region showing relatively higher coherence than others[109]. However, more institutionalised and better coordination between these regional platforms is needed. [110] (see also section on "Regional implementation of the Baltic Sea MAP" below).

Ecosystem-based fisheries management

While the Baltic MAP formally incorporates **ecosystem-based management principles[111],** a broad consensus among studies and interviewed stakeholders indicates it has not practically addressed the marine environment's challenges. The BSAC members[112], for instance, express concerns that the plan has either not contributed to – or has even been counterproductive for – implementation of the ecosystem-based approach to fisheries management. While some emphasise its potential if properly implemented, all agree on the significant impact of the ecosystem on fish stocks, which must be better integrated into management decisions.

Others also note that the ecosystem-based approach has been insufficiently applied[113], and that the MAP lacks a more holistic, integrated approach to fisheries management, considering other external factors and unforeseeable environmental conditions. [114] While fishing remains one of the factors that influence the stocks and increases the challenge of maintaining biodiversity[115], other concurrent, challenging developments are occurring that affect the conditions of the stocks (e.g. climate change, eutrophication, changes in salinity).[116]

The BSAC members also draw attention to the growing populations of seal and cormorant, which have caused significant challenges to fisheries in the Baltic. The conflict between Baltic coastal

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108 European Commission, Our Baltic declaration – First progress report on commitments, September 2023

109 European Commission, MS introduce better measures to protect coastal and marine environments, news article, Directorate-General for Environment, 2025

110 Interview the HELCOM Secretariat, April-June 2025

111 CFP Regulation (EU) No1380/2013, Article 4(1): (9) "ecosystem-based approach to fisheries management means an integrated approach to managing fisheries within ecologically meaningful boundaries which seeks to manage the use of natural resources, taking account of fishing and other human activities, while preserving both the biological wealth and the biological processes necessary to safeguard the composition, structure and functioning of the habitats of the ecosystem affected, by taking into account the knowledge and uncertainties regarding biotic, abiotic and human components of ecosystems"

112 BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, 2024

113 M. Nielsen et al., Situationsbeskrivelse af den danske fiskeri-, akvakultur og fiskeindustrisektor: Den Europæiske Hav- og Fiskerifond 2021-2027, IFRO Udredning, Nr. 2019/26, University of Copenhagen, 2020

114 Interview with Baltic Sea stakeholders (e.g. WWF Baltic Sea Programme; Stockholm University Baltic Sea Centre, CCB, FishSec), April-June 2025

115 Commission Staff Working Document, accompanying the first report on the implementation of the Baltic Multiannual Plan, 2020, SWD(2020) 171 final

116 BSAC, BSAC recommendations for the fishery in the Baltic Sea in 2025, 2024

fisheries and grey seal conservation, in particular, has been pronounced since the mid-1990s and endures despite sustained efforts to achieve a more harmonious coexistence.[117] However, researchers at Stockholm University Baltic Sea Centre stress that while prey predators (such as seals, cormorants) are important, the primary focus should remain on other critical factors affecting fish stocks. [118]

Stakeholders underscore the need for a better understanding of the dynamics and complexity of marine ecosystems – one that recognises that effective fisheries management cannot occur in isolation from the wider marine environment.[119] The BSAC emphasises the importance of estimating and quantifying the effects of species interactions. [120] They also argue that the current system of scientific advice must better reflect the ecosystem changes and impact. A promising, albeit still-developing, project to integrate ecosystem variability into Baltic Sea fisheries management is carried out by the ICES WKEBFABII.[121] This initiative (requiring significant technical and scientific work to apply it in real-world decision-making) focuses on developing ecosystem-based approaches to enhance fisheries advice for Baltic pelagic stocks, such as central Baltic herring and sprat. It aims to create an ecosystem-based scaling factor (Feco) that adjusts fishing mortality reference points (FMSY) based on ecosystem conditions and stock productivity, improving medium- and long-term sustainability.

Transitioning to ecosystem-based management is also vital to prevent fishing from negatively impacting food web functions or ecosystem resilience, a need amplified by climate change. Achieving a healthy Baltic Sea is not just an environmental imperative; it is a significant investment in the region's sustainable economic and societal development, with the achievement of GES of national marine waters by 2040 estimated to be worth 5.6 billion euros annually to the people around the Baltic Sea.[122]

However, the stakeholders acknowledge that implementing an ecosystem-based approach to fisheries management is complex[123], requiring a clear understanding of an ecosystem-based

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117 K. Svels et al., Struggling towards co-existence of the Baltic Sea coastal fisheries and the grey seal, *Ambio*, Vol. 54 (2024), Springer, December 2024

118 H. Hamrén, Scientists: Wrong to link seals and cormorants to overall decline of Baltic herring, Stockholm University Baltic Sea Centre, 2025

119 BSAC, BSAC recommendations for the fishery in the Baltic Sea in 2025, 2024; Interview with SE Stockholm University Baltic Sea Centre; Interview with HELCOM Secretariat, April-June 2025

120 BSAC, BSAC recommendations for the fishery in the Baltic Sea in 2025, 2024; Interview with SE Stockholm University Baltic Sea Centre, Interview with HELCOM Secretariat, April-June 2025

121 ICES, Baltic Fisheries Assessment Working Group (WGBFAS), Volume 5 | Issue 58 ICES Scientific Reports, 2023, Workshop on Ecosystem-Based Fisheries Advice for the Baltic organised by ICES. WKEBFAB aims at developing a roadmap to include ecosystem considerations in fisheries advice for the Baltic Sea.

122 L. Bergström & J. Haldin, State of the Baltic Sea. Third HELCOM holistic assessment 2016-2021. Baltic Sea Environment Proceedings n°194, HELCOM, 2023

123 Baltic Waters, Deep Dive: Ecosystem-Based Fisheries Management – Utopia or Opportunity?, 2024; Interview with HELCOM Secretariat

approach[124] and of ecosystem functions to address knowledge gaps, new management systems, work processes and more complex and costly data collection framework[125]. Nevertheless, environmental NGOs[126] note that a significant barrier to change is not a lack of scientific understanding, but rather the strong economic and political interests that often impede progress, which favour short-term considerations over long-term sustainability. As an example, they suggest developing an ecosystem-based restoration plan for Baltic cod. This plan would take a holistic approach, considering interspecies interactions, threats to the stock such as eutrophication, pollution, climate change, habitat loss and the overall state of the Baltic Sea.[127]

Landing Obligation

A key objective of the CFP is to implement the Landing Obligation (LO) to eliminate discards[128], avoid and reduce unwanted catches. While the LO for the three Baltic species came into force on 01 January 2015, scientific assessments and stakeholders reveal persistent issues:

- **Enforcement and monitoring:** Several BSAC members highlight that discard control has not been properly implemented and argue that the MAP has not adequately supported the LO implementation such as through alternative gear development or removal of gears that do not work, with some MAP provisions even being counterproductive in the LO implementation (e.g. for flatfish).[129] The small-scale fisheries representatives in a BSAC report[130] also stress the need for better implementation of the LO, drawing attention to the high discard rates of eastern cod, especially though a wider application of management measures for cod. The Commission also considers the persistent discard problem a control and enforcement issue within the EU's fisheries control system.[131]
- **Compliance with the LO:** The European Fisheries Control Agency (EFCA)'s evaluation of compliance with the LO regarding legal and illegal discarding in the Baltic

[124] Interview DE German Fisheries Association, April-June 2025

[125] Interview SFPO – Swedish Fish Producer Organisation, April-June 2025

[126] WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023; European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023; Baltic Waters, Deep Dive: Ecosystem-Based Fisheries Management – Utopia or Opportunity?, 2024

[127] WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023; European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023; Baltic Waters, Deep Dive: Ecosystem-Based Fisheries Management – Utopia or Opportunity?, 2024

[128] CFP Regulation (EU) No1380/2013, Article 4(1): (10) 'discards' means catches that are returned to the sea

[129] BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, 2024

[130] BSAC, BSAC recommendations for the fishery in the Baltic Sea in 2025, 2024

[131] Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

Sea (2019-2021)[132] shows mixed trends. For example, compliance with the LO among trawlers targeting demersal species[133] declined compared to 2015–2018, especially for cod. In contrast, compliance with the LO for cod improved in the western Baltic since 2019. EFCA also underscores the role of electronic monitoring systems and/or observers for gathering verified data to monitor compliance with the fisheries regulations, including the LO. The 2025 study on supporting the evaluation of the LO[134] even note that the application of the Margin of Tolerance (permitted discrepancy between the weight of fish catches recorded in fishing logbooks and the actual landed weight) in the Baltic Sea MAP's Article 13[135] is perceived by stakeholders as having provided an incentive to misreport catches, leading to poor scientific stock assessment of fish stocks such as herring. In this context, environmental NGOs stress that without guaranteed LO compliance and ineffective control and catch registration systems in Member States, TACs have to be set below the catch advice by a sufficient margin to ensure that continued illegal discard practices do not bring fishing above sustainable levels.[136]

- **Limited impact on discard practices:** According to ICES, discard practices in the Baltic Sea have shown limited improvement. While pelagic[137] discards remain low, illegal discarding continues in other fisheries. STECF's evaluation of Member States' reports indicates weak LO implementation and high non-compliance risk in several Baltic fisheries. However, despite ongoing challenges with discards, some efforts are made. For instance, Denmark has developed selective fishing gear and conducted trials with fully monitored fisheries (CCTV). [138]
- **Complex regulatory framework and difficulties for fishers:** Various stakeholders interviewed for the study noted that the complex regulatory framework, particularly

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132 BALTFISH Control Experts Group (CEG), Evaluation of Compliance with the Landing Obligation Baltic Sea 2019 – 2021, EFCA, 2022

133 Seafishpool, Demersal Fish, Fish Blog, 2024: Demersal fish inhabit the depths of seas or lakes, predominantly dwelling and foraging near or on the seabed. This ecological niche is characterized by its proximity to the bottom of aquatic bodies, where these unique species thrive amidst sediment and marine life.
ICES, Baltic Sea ecoregion – Fisheries overview, 2021: Most important demersal fisheries are the bottom-trawl fisheries for cod and flatfish. Demersal fisheries are concentrated in the south and west of the Baltic Sea, while the pelagic fisheries are more widespread.

134 S. Davie et al., Study supporting the evaluation of the landing obligation – Common Fisheries Policy, Publications Office of the European Union, 2025

135 Margin of Tolerance under Article 13 of the Baltic MAP was initially set at 10% of the total catch and, as of Baltic MAP Regulation (EU) No 2023/2842, amended to 20% per species for a transitional period until January 10, 2028.

136 WWF Baltic Sea Programme & CCB, Joint NGO recommendations on Baltic Sea fishing opportunities for 2024, policy paper, 2023; European Commission, Proposal for a Council Regulation on 2024 fishing opportunities, COM(2023)492final, 2023; Client Earth, Setting Total Allowable Catches (TACs) in the context of the Landing Obligation, 2020

137 AngelGurus, Pelagisch: Definition, Beispiele & FAQ (Glossar), 2023: Pelagic is a term used in fishing to refer to fish species that swim freely in the open ocean. These fish live in the pelagic zone, which encompasses the area of open water between the sea surface and the sea floor.

138 H. Falborg, Kameraer og DNA-tests til kontrol af discard-fisk, DTU Aqua, 2019

regarding bycatch and discard rules, poses significant challenges for both the implementation and enforcement of the LO. A major issue is the difficulty of differentiating between species at sea, especially similar-looking pelagic species like herring and sprat[139], or quota-regulated flatfish like plaice versus non-quota flatfish like flounder, as well as related costs for fishers. These make it virtually impossible to monitor whether discarded fish are illegal discards or permitted ones. Furthermore, there is a lack of understanding within the sector regarding these complex rules. Fishers, who have been instructed for decades to discard undersized fish, are now required to land some species while still being allowed to discard others. Upon landing, they often face uncertainty about how or where to dispose of undersized catches, despite available funding for bycatch utilisation this often remains unused in ports. These complexities mean that passive fisheries[140] have minimal bycatch, but trawl fisheries continue to struggle with larger bycatch volumes, including illegal discards, especially in the eastern Baltic Sea. Ultimately, the inability to effectively control and monitor such regulations undermines efforts for sustainable fisheries management.[141]

Socio-economic situation

Based on the STECF data (2016-2021), the fisheries sector in the Baltic Sea region experienced a significant contraction across the main indicators.

- **Fleet capacity:** The number of vessels declined by 25 % and gross tonnage (GT) decreased by 17 %. The capacity in gross tonnage was reduced by 28 % for the small-scale coastal fleet (SSCF) and by 14 % for the large-scale fleet (LSF).
- **Employment** saw a significant reduction. The number of jobs dropped by 28.5 %, with SSCF experiencing a slightly higher job loss rate (-29 %) than LSF (-26 %). Full-Time Equivalent (FTE) employment declined by 27 % over the same period.
- The decline in fishing effort **(days at sea)** was most pronounced in the LSF (-50 %).
- In line with the overall downtrend in fleet capacity and fishing activity, **profitability** experienced a sharp decline. Between 2016 and 2021, Gross Value Added (GVA) decreased by 26 %, while gross profit fell by 48 %. A significant decline was observed in the SSCF, where gross profit dropped by -371 %.

This imbalance in the distribution of fishery resources between the SSCF and LSF was also noted in a European Parliament hearing, which stressed that the MAP has failed to protect the SSCF, who

[139] Interview with SE Stockholm University Baltic Sea Centre, April-June 2025

[140] W. Hubert et al., Chapter 6 Passive capture techniques, 2012: Passive fisheries or passive capture techniques involve "the capture of fishes or other aquatic animals by entanglement, entrapment, or angling devices that are not actively moved by humans or machines while the organisms are being captured (Lagler 1978). The behavior and movements of the animals themselves result in their capture. Nets and traps have been widely used, and many of applied techniques were also used by the ancient Egyptians, Greeks, and Romans (Alverson 1963)."

[141] Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April-June 2025

represent over 90 % of the fleet, more than 60 % of employment, but receive only 7 % of the total catch.[142]

Poland held the largest share of capacity in terms of gross tonnage in the Baltic Sea region (27.6 %), followed by **Finland** (18.6 %) and **Sweden** (12.2 %) (see Figure 8 and Annex 3: Statistical data and maps).

Employment was predominantly driven by Polish fishers, accounting for 61.6 % of FTE, followed by Latvia and Estonia, each contributing 8 %. In terms of profitability, the **Swedish and Finnish** fleets generated the highest gross profits (€12.3 million and €11.7 million, respectively). In contrast, the German fleet recorded gross losses of €-5.8 million, and Denmark reported a loss of €-0.87 million (see Figure 9 and Annex 3).

Table 1 – Fleet capacity, fishing effort, employment and profitability in the Baltic Sea

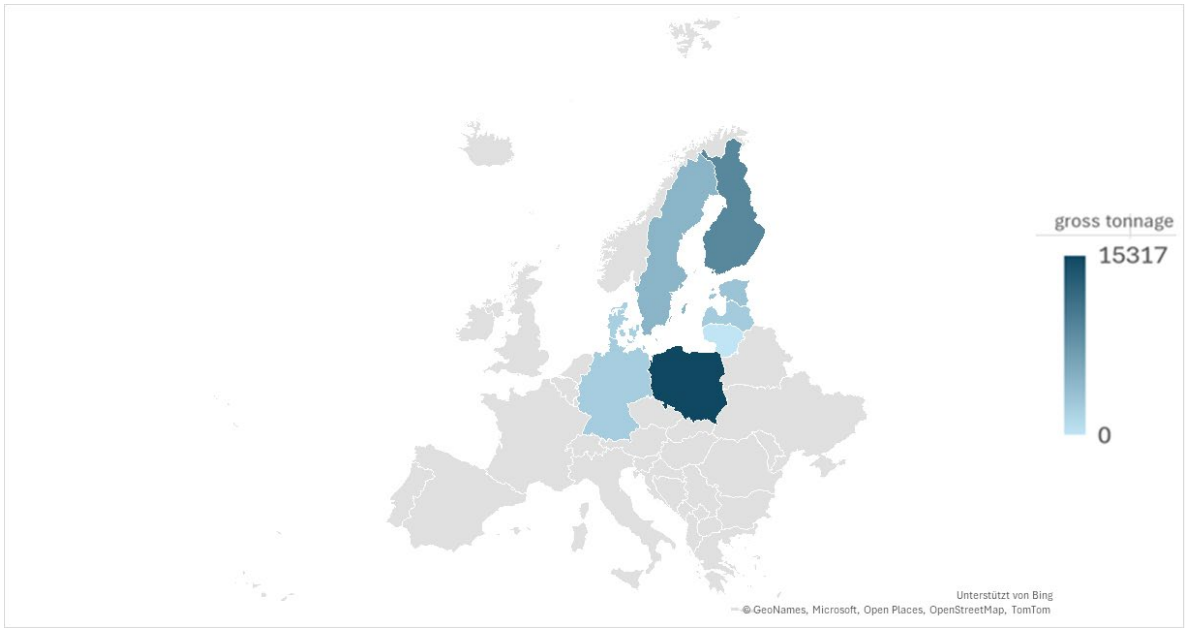
Indicator	Fisheries	Indicator	2016	2021	Change %
Fleet capacity	SSCF	Number of vessels	5 624	4 228	-24.8
	LSF	Number of vessels	542	368	-32.1
	Total	Number of vessels	6 166	4 596	-25.5
	SSCF	GT	14 992	10 731	-28.4
	LSF	GT	52 161	44 765	-14.2
	Total	GT	67 153	55 496	-17.4
Employment	SSCF	Total jobs	6 562	4 646	-29.2
	LSF	Total jobs	2 126	1 564	-26.4
	Total	Total jobs	8 688	6 210	-28.5
	SSCF	FTE	2 734	2 044	-25.2
	LSF	FTE	1 787	1 258	-29.6
	Total	FTE	4 521	3 302	-27.0
Fishing effort	SSCF	Days at sea	352 412	260 954	-26.0
	LSF	Days at sea	62 087	31 356	-49.5
	Total	Days at sea	414 499	292 310	-29.5
Profitability	SSCF	GVA (€ million)	26 665	20 855	-21.8
	LSF	GVA (€ million)	92 379	67 284	-27.2

142 LIFE, LIFE calls for a revision of the Baltic Sea MAP, website

Indicator	Fisheries	Indicator	2016	2021	Change %
	Total	GVA (€ million)	119 057	88 136 433	-26.0
	SSCF	Gross profit (€ million)	1 372	-3 727	-371.4
	LSF	Gross profit (€ million)	54 790	33 179	-39.4
	Total	Gross profit (€ million)	56 174	29 450	-47.6

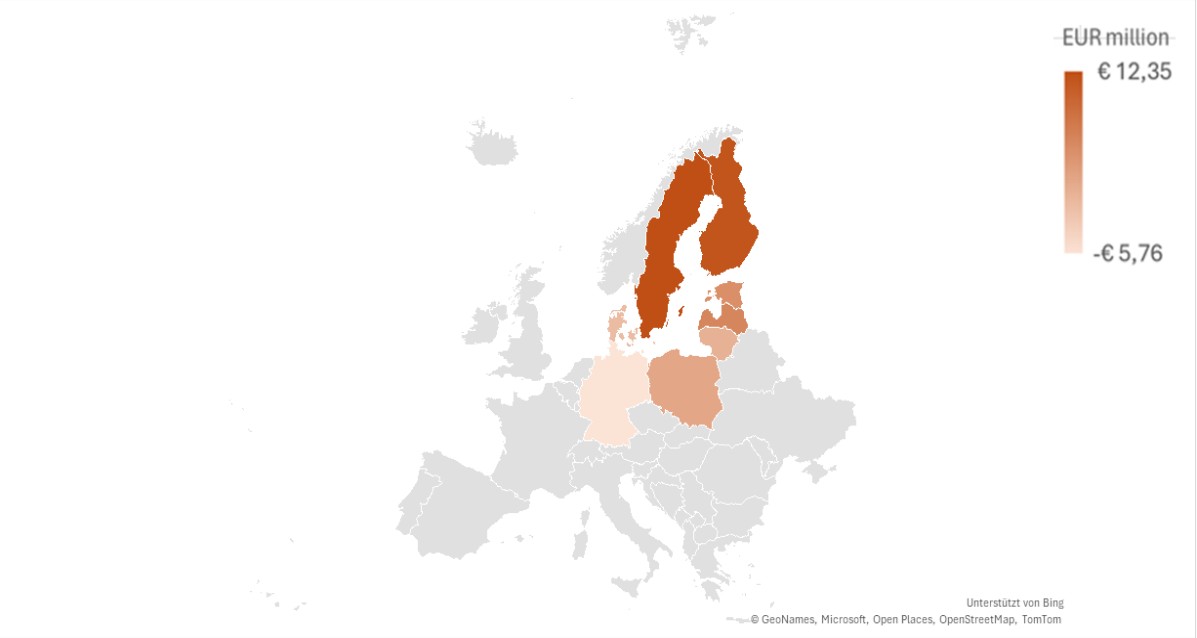
Source: M&E Factory based on data from STECF 18-07 and STECF 23-07. The table can be updated with recent data prior to the PECH committee presentation in September 2025, should they become available.

Figure 8 – Fishing fleet capacity in 2021 (in terms of gross tonnage)



Source: M&E factory based on data from STECF 18-07 and STECF 23-07

Figure 9 – Profitability of fishing fleets in 2021 (€ million)

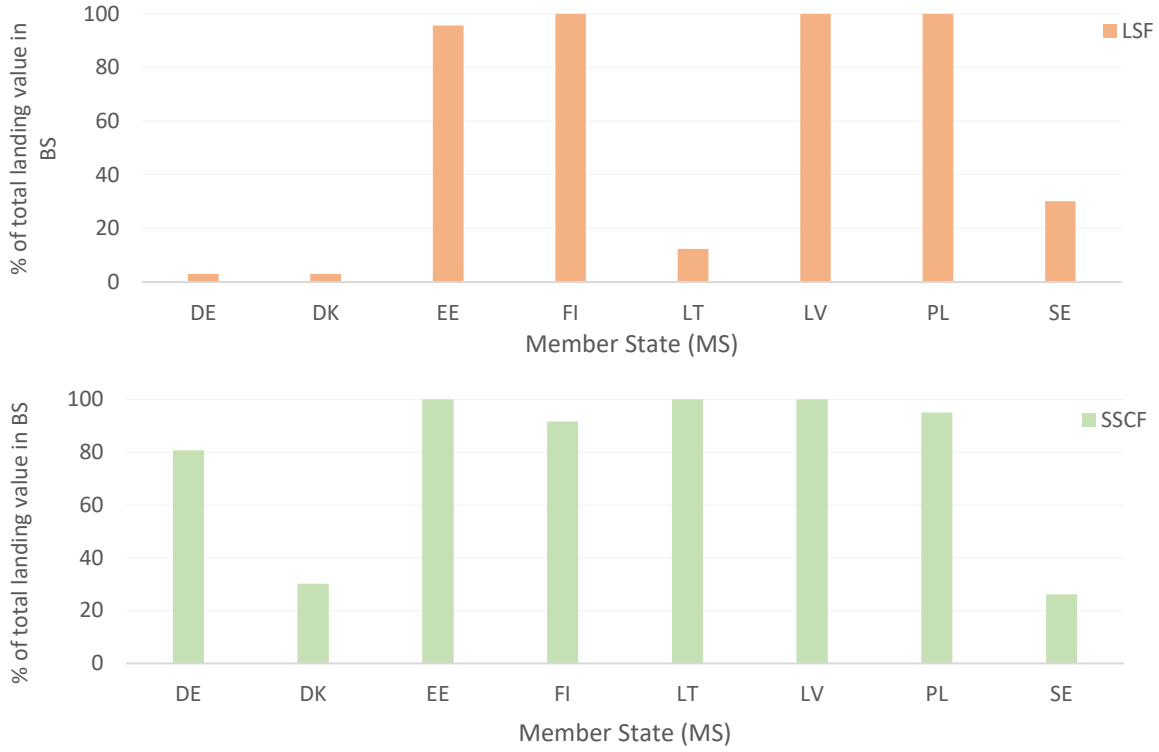


Source: M&E factory based on data from STECF 18-07 and STECF 23-07

Figure 10 below shows **how much of each Baltic Member State's fishing activity takes place in the Baltic Sea,** based on the share of total landing value in EUR, separated by fleet type – large-scale fleet (LSF) and small-scale coastal fleet (SSCF).

Latvia, Poland and Estonia are fully or heavily dependent on the Baltic Sea for both LSF and SSCF, making them vulnerable to disruptions in Baltic Sea fisheries and ecological, regulatory, and economic changes, including MAP-related-decisions on fishing opportunities. **Finland** also exhibits a strong Baltic focus, particularly for its LSF. The **Lithuanian** SSCF operates entirely in the Baltic region, while its LSF largely operates elsewhere. **Germany, Denmark** and **Sweden exhibit a more diversified pattern,** primarily in their LSF, indicating higher resilience to Baltic Sea fishery disruptions due to significant activity outside the region.

Figure 10 – Share of total landing value from the Baltic Sea for each Member State, presented separately for LSF and SSCF, 2021



Source: M&E factory based on 2023 Annual Economic Report on the EU Fishing Fleet (STECF 23-07), key parameter estimates by fishing activity and MS fleet operating in the Baltic Sea. More detailed data can be found in Table A.2.

On the specific **socio-economic impact** of the MAP and EU fisheries management frameworks, various concerns are raised:

- The Danish Fishermen's Association (DFPO) issued a strong critique in an October 2023 press release, sharply criticising the EU's fisheries management in the Baltic Sea, including the use of additional measures such as closure periods.[143] They described the situation as a result of "years of political failure", which has led to drastic reductions in fishing opportunities for 2024. DFPO pointed out that the already limited fishing opportunities were further reduced, almost eliminating commercial fishing in the region. They emphasised that fishers are bearing the consequences of a management system that has failed to ensure sustainable fish stocks and a viable future for commercial fishing.[144] Although DFPO does not directly mention a revision of the MAP, their criticism indicates a desire for more effective and sustainable management. They call for measures that can ensure both the sustainability of fish stocks and the livelihoods of fishers.

143 Danmarks Fiskeriforening, Fiskerne betaler prisen for årelangt politisk svigt i Østersøen, 2023

144 Danmarks Fiskeriforening, Fiskerne betaler prisen for årelangt politisk svigt i Østersøen, 2023

- Similarly, the Baltic Water organisation and Stockholm University Baltic Sea Centre[145] note that sometimes the MAP measures largely disfavour SSCF. For example, of the total catch (75 195 tonnes) taken by Swedish vessels, 89 % was sold to feed factories, while only 11 % was used for human consumption (mainly herring and sprat). Since 2009, when transferable fishing rights were introduced, the share of fish for human consumption has decreased drastically in favour of large-scale industrial trawlers fishing for feed. Also, Sweden's 12-sea-mile trawling limits, with spring spawning closures in 2024 (April-May), disproportionately affect SSCF, as large trawlers can continue targeting migratory herring wintering in deeper waters, reducing the quantities of herring reaching coastal areas for later spawning in spring and summer for SSCF (see also next section on safeguards).
- The BSAC also note that the impact of fishery closures measures on recreational fishers. The recreational fisheries is a vital component of the blue economy[146], contributing to nature conservation (e.g. angler organisations voluntarily supporting the recovery of fish stocks such as cod), community engagement, livelihood of remote coastal areas and other socio-economic benefits. Therefore, the BSAC[147] and European Anglers Associations[148] ask that recreational fishers be fully recognised within the CFP and benefit from EU funding like EMFAF.

However, it is important to note that economic trends in the fisheries sector are rarely the result of a single factor or framework; instead, they stem from the interplay of multiple factors that need to be taken into account. Accordingly, caution is warranted in attributing economic decline solely to the MAP. As in the case of the LO implementation, most studies concentrate on the forecasted consequences of the LO rather than its actual consequences and impact.[149]

The Swedish Fish Producer Organisation (SFPO) stresses[150] that **unstable and fluctuating annual political decisions on fishing opportunities severely hinder the fisheries sector.** This unpredictability makes long-term planning, company development and investment impossible, as banks are unwilling to provide loans due to uncertain future catches. Consequently, this uncertainty deters young people from entering an industry whose future is so reliant on volatile political shifts, SFPO warns.

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145 Baltic Waters, Baltic Sea Brief 62: Four measures for Baltic Sea fisheries in 2024, 2024; Stockholm University Baltic Sea Centre, Fishing bans in Baltic Proper do not favour herring stock recovery, 2024

146 Blue economy refers to any economic activity relating to oceans and seas. It covers a broad range of established and emerging sectors. European Commission, Sustainable blue economy , 2021; Other definitions can be found here in the 2020 paper from the EPRS, with Frederik Scholaert as lead author., F. Scholaert, The blue economy, 2020

147 BSAC, White Paper Implementation and revision of the CFP with a Baltic perspective, report, 2022

148 European Anglers Alliance, EAA – Casting concerns: EAA meets PECH Committee MEPs during the parliamentary mission to Denmark, 2025

149 R.Prellezo & S.Villasante, Economic and social impacts of the landing obligation of the European Common Fisheries Policy: A review, Marine Policy, Vol.148 (Article105437), Elsevier, 2023

150 Interview with the Swedish Fish Producer Organisation (SFPO), April-June 2025

3.1.2. Implementation of safeguards

To address the decline of fish stocks in the Baltic Sea, particularly cod, herring and sprat, the Baltic Member States have progressively implemented safeguard measures[151] under the MAP – varying in intensity, timing and national commitment – to contribute to stock recovery as part of the Common Fisheries Policy (CFP).

- **Denmark:** Since 2017, Denmark has implemented progressive reductions in fishing opportunities for cod and herring. In 2020, as part of its national strategy to support the EU's objectives for sustainable fisheries and maintain good ecological status in the marine environment, Denmark introduced stricter rules for quota management and controls were introduced in areas with restrictions[152], including mandatory use of selective gear, especially in areas with a high prevalence of juvenile (young) cod, to reduce bycatch. In 2024, Denmark introduced a total ban on both commercial and recreational fishing for cod throughout the Baltic Sea, including the Belts and the Øresund. Despite these measures, as previously mentioned, Denmark's fishing industry and political stakeholders have criticised the approach, arguing it lacks a balance between achieving GES and maintaining economic viability for coastal communities.
- **Estonia**[153] has repeatedly applied Article 5 safeguards to support the spawning of cod, herring, and sprat. In 2024, trawl closures were introduced to protect central Baltic herring, and in 2025, measures are planned to support sprat spawning. Past closures for cod were implemented, but abiotic conditions limited effectiveness. Furthermore, the effectiveness of these measures is difficult to assess for herring and sprat as they have been in place for a short period. ICES recommendations form the basis for setting the TACs.
- **Finland and Sweden**[154] have used safeguard mechanisms to ban fishing in certain areas during the spawning time of some species. However, the fishing bans and limitations have been too short and ill-timed to be effective. For example, Sweden's 12-sea-mile trawling limits, with spring spawning closures (April-May), fail to protect key herring spawning areas in winter[155], as the majority of industrial herring fishing occurs during winter months and outside these closure periods. Data for 2011-2022

[151] CFP Regulation (EU) No1380/2013, Article 4 (1): (19) "safeguard means a precautionary measure designed to avoid something undesirable occurring"

[152] Council of the European Union, Fishing opportunities in the EU, website; Fiskeristyrelsen, Kontrolrapport 2020, Landbrugs- og Fiskeristyrelsen, 2020

[153] Interview with the EE Ministry of Regional Affairs and Agriculture, April-June 2025

[154] Interviews with the FI and SE stakeholders, April-June 2025; Stockholm University Baltic Sea Centre, Fishing bans in Baltic Proper do not favour herring stock recovery, 2024

[155] Stockholm University Baltic Sea Centre, Fishing bans in Baltic Proper do not favour herring stock recovery, 2024: Herring are a migratory species that spend most of their lives in the open sea. During the winter, the spring-spawning herring come closer to the coast and gather in large shoals to overwinter at a depth of 50-60 metres. This is when the larger trawlers fish for them. Between April and June the herring move into the archipelagos and shallows (usually between 10 and 20 metres) to spawn. This is when small-scale coastal fisheries target them.

show that more than half (58 %) of Swedish herring catches were taken during January–March, 23 % in October–December, and only about 10 % during the official spring spawning closures (April–May).[156] This disproportionately affects small-scale coastal fisheries, as large trawlers can continue targeting migratory herring wintering in deeper waters, potentially reducing the quantities of herring reaching coastal areas for later spawning in spring and summer for small-scale coastal fisheries. [157]

- In **Lithuania**[158], the MAP is implemented in conjunction with annual quota regulations, guided by ICES advice. The most notable safeguard is the 2019 cod fishing ban. The European Union implemented this as an emergency ban on commercial fishing for cod in most of the Baltic Sea, specifically targeting the eastern Baltic cod stock, to prevent its collapse.[159]
- **Latvia**[160] has applied the safeguard mechanisms primarily when Council decisions align with scientific advice on stock decline. In such cases, to avoid the imposition of the most stringent fishing restrictions, additional technical measures[161] are applied, such as seasonal fishing bans in specific months or zones, particularly before spawning or during other sensitive periods. Such measures have, for instance, been implemented in sprat fishing to prevent the complete closure of the fishery while at the same time demonstrating responsible management. Although the effectiveness of such mechanisms is difficult to quantify, the Latvian Ministry of Agriculture considers them to be positively impactful. If fishing does not take place during a specific period, it is assumed that this at least partially contributes to the protection of the stock.
- **Poland**[162] largely applies EU-level safeguards. Certain mechanisms, e.g. a ban on herring fishing in April 2024, had positive but short-term effects. At national level, temporary compensation was paid for the closed fishing seasons. The basic mechanism used is the fishing quota, occasionally supplemented by additional measures such as protection in specific periods, areas or for certain fish sizes. Poland

156 Baltic Waters, Baltic Sea Brief 62: Four measures for Baltic Sea fisheries in 2024, 2024; Stockholm University Baltic Sea Centre, Fishing bans in Baltic Proper do not favour herring stock recovery, 2024

157 Stockholm University Baltic Sea Centre, Fishing bans in Baltic Proper do not favour herring stock recovery, 2024

158 Interview with LT Ministry of Agriculture, April–June 2025

159 European Commission, Commission approves measures to protect eastern Baltic cod, press release, 17 July 2019; Council of the European Union, Baltic Sea Council agrees on catch limits for 2025, press release, 2024
This ban, initially lasting until December 31, 2019, has been extended and is still in effect in 2025 due to continued poor stock conditions. With both Eastern and Western Baltic cod stocks in poor condition, the Council agreed to continue setting the 2025 TACs for by catches only, in order to allow for the recovery of the stocks.

160 Interview with LV Ministry of Agriculture; LV Institute of Food Safety, Animal Health and Environment "BIOR", April–June 2025

161 CFP Regulation (EU) No1380/2013, Article 4(1): (20) 'technical measure' means a measure that regulates the composition of catches by species and size and the impacts on components of the ecosystems resulting from fishing activities by establishing conditions for the use and structure of fishing gear and restrictions on access to fishing areas

162 Interview with PL Ministry for Agriculture and Rural Development, April–June 2025

initiated additional closed areas for cod fishing that were not included in the MAP; the Commission asked, as usual, for ICES's opinion before approval.

- According to the German Ministry of Agriculture Rural Areas, Europe and Consumer Protection[163], **Germany** implements MAP-related safeguards measures like fishery closures, quotas and the discard ban. Yet, the enforcement of the discard ban is considered weak, especially in terms of systemic underreporting and normalisation of stocks lingering between Blim and Btrigger.

Despite these safeguards, Coalition Clean Baltic (CCB) argues that additional measures are necessary. In July 2024, CCB filed a legal case to clarify the interpretation of Article 4(6) of the MAP.[164] CCB argues that Blim must be treated as an absolute threshold, below which no fishing should occur. CCB criticises current Baltic MAP policymaking for having stock levels fluctuating between Blim and Btrigger, a practice they see as highly risky. Instead, they advocate for the implementation of safeguards as soon as stocks approach the Btrigger level, not only after Blim is breached, to prevent irreversible stock collapse – citing the crisis facing Baltic cod as an example. CCB contends that quotas have been set at unsustainable levels, thereby undermining stock recovery efforts.

3.1.3. Regional implementation of the Baltic Sea MAP

Regionalisation in the Common Fisheries Policy (CFP) aims to enable a bottom-up approach to fisheries governance by allowing lower-level authorities and stakeholders to participate in fisheries management at a regional level. [165] Two main tools of regionalisation under the current CFP are: the institutionalised **regional advisory councils**[166] and **joint recommendations** from Member States. The regional advisory councils must be consulted on various issues and may adopt recommendations. The second tool allows for the submission of **joint recommendations** by relevant Member States, which serve as a basis for the Commission to adopt delegated acts.[167]

The Baltic MAP Regulation (EU) 2016/1139 provides the legal basis for regional cooperation among Baltic Sea Member States, enabling them to submit joint recommendations to amend technical measures and initiate additional actions, particularly in response to abrupt changes in the status of main stocks (e.g. cod, herring, sprat).

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163 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April-June 2025

164 Case T-342/24: Action brought on 5 July 2024, Coalition Clean Baltic v Council

165 EASME, CFP Regionalisation, (EASME/EMFF/2018/011 Lot 1 & 2), Final Report, 2022

166 EASME, CFP Regionalisation, (EASME/EMFF/2018/011 Lot 1 & 2), Final Report, 2022: The 2002 CFP reform established regionalisation in EU fisheries governance by creating seven Regional Advisory Councils (RACs). The 2013 CFP reform intensified this approach, renaming RACs to Advisory Councils (ACs) and adding four more.

167 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

Regional implementation is mainly carried out through two collaborative platforms: the Baltic Sea Fisheries Forum (BALTFISH)[168] and the Baltic Sea Advisory Council (BSAC).

- **BALTFISH:** A regional body that provides a platform for cooperation and discussion on important fisheries issues among fisheries administrations and key stakeholders in the Baltic Sea[169]. It holds a significant, direct influence on the CFP implementation in the region. BALTFISH operates on two levels: High-level group – consisting of fisheries directors from the Member States and invited officials from the Commission, and BALTFISH Forum Seminar – including representatives from the Member States, the Commission, and other organisations like BSAC, ICES, HELCOM, NGOs, etc. This "intermediate" level of the BALTFISH forum was set up to facilitate broader information exchange with a diverse range of stakeholders. The BSAC's role as an observer takes place at this level.[170]
- **BSAC:** An advisory body representing the fisheries and other interest groups affected by the CFP (e.g. environmental organisations, sports and recreational fisheries organisations). Although BSAC is not part of the formal decision-making process on CFP implementation[171], its members must be legally consulted on various regulatory texts prepared by the Commission and the Member States[172].

Some interviewed national stakeholders view regionalisation – achieved through joint recommendations and consultation with advisory councils and other stakeholders – as a notable accomplishment.[173] For example, one stakeholder cited positive results related to technical measures (cod and flatfish gears) and landing obligations (derogations in cod and salmon fisheries allowing the release of certain catches).[174]

Overall, the interviewed stakeholders across all Baltic Member States see the regional cooperation among Member States as very effective, especially in BALTFISH, and there is a regular dialogue with fisheries stakeholders. There is also communication with the European Commission as the Commission is part of the regionalisation process. Cooperation with the Council is more limited, mostly through TACs and the quota BALTFISH proposal. Regional cooperation has been strengthened, and the knowledge of the needs of the Member States is well spread. Moreover,

168 The Member States of the Baltic Sea set up in late 2013 the Baltic Sea Fisheries Forum ("BALTFISH").

169 HELCOM, BALTFISH Forum, website

170 EASME, CFP Regionalisation, (EASME/EMFF/2018/011 Lot 1 & 2), Final Report, 2022

171 BSAC, White Paper Implementation and revision of the CFP with a Baltic perspective, report, 2022

172 BSAC, About the Baltic Sea AC, website

173 Interview with the EE Ministry of Regional Affairs and Agriculture; Interview with LT Ministry of Agriculture; Interview with LV Ministry of Agriculture; Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR", Interview with PL Ministry for Agriculture and Rural Development, April-June 2025

174 Interview with the EE Ministry of Regional Affairs and Agriculture, April-June 2025

cooperation around the Baltic Sea includes that with other fishers in the LIFE Platform[175] (from DK, DE, SE) and in the BSAC.[176]

At **national level,** the stakeholders note good cooperation and coordination between institutions and stakeholders across stakeholders at national level (PL, EE)[177], for example in drafting legislation in line with the MAP objectives (LT)[178]. These cooperation and coordination efforts are also supported by national cooperation and advisory platforms such as: the Association of Professional Fishers participating regularly in the discussions on fisheries quotas nationally, with both informal cooperation with the Ministry and other stakeholders and formal discussions in the national fisheries council (FI)[179], stakeholders involved in the formation of the national position, including representatives from the sector and scientists through the Fisheries Advisory Council (LV)[180].

Cooperation among scientific communities within and across countries is also considered beneficial (e.g. in ICES working groups), facilitating consistent data interpretation and scientific justification for decisions across the region. There are many meetings and consultations within ICES, and this cooperation is effective.[181] Cooperation of other stakeholders with the scientific community is also considered key – especially to evaluate how reliable their assessments are, e.g., in terms of probabilities.[182]

However, some stakeholders consulted for this study or for other reports remain unconvinced of the MAP's added value in strengthening regional cooperation[183], with certain stakeholders not even aware of the MAP (e.g. national institutions, some fishers)[184]. Some even mention that the positive collaboration, primarily driven by BSAC and BALTFISH, existed prior to the MAP implementation and thus it has not changed the patterns or frequency of regional cooperation.[185]

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175 LIFE represents the interests of 33 organisations in 15 EU Member States associating around 10,000 small scale fishers across all European sea basins from the Baltic to the Black Sea.

176 Interview with the Low Impact Fishers of Europe (LIFE), April–June 2025

177 Interview with the PL Ministry for Agriculture and Rural Development; Interview with the EE Ministry of Regional Affairs and Agriculture, April–June 2025;

178 Interview with the LT Ministry of Agriculture, April–June 2025

179 Interview with the FI Association of Professional Fishers, April–June 2025

180 Interview with LV Ministry of Agriculture, April–June 2025

181 Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR"; Interview with PL Marine Fisheries Research Institute in Gdynia, April–June 2025

182 Interview DE German Fisheries Association, April–June 2025

183 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024; BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, 2024

184 Interview with the Low Impact Fishers of Europe (LIFE), Interview with the PL Ministry for Agriculture and Rural Development, Interview with the WWF Baltic Sea Programme, April–June 2025

185 Interview with WWF Baltic Sea Programme; Interview with PL Ministry for Agriculture and Rural Development, PL Marine Fisheries Research Institute; Interview with SFPO – Swedish Fish Producer Organisation, April–June

Moreover, critical issues, such as more sustainable management of eastern Baltic cod or concrete measures to protect the endangered harbour porpoises, have not been collectively addressed.[186] The BSAC further highlights that predator management and its implications for natural mortality exemplify areas where the MAP has not spurred the hoped-for improvements in regional cooperation.[187]

Stakeholders point out several reasons:

- **Resource and time constraints:** While the idea of joint recommendations is widely accepted, their preparation requires extensive and time-consuming upfront research. Moreover, the subsequent adoption of delegated acts takes time due to the various scientific and administrative stages. Scrutiny by the Council and the European Parliament are important steps in the process.[188] The BSAC also stresses that adequate resources are crucial for the regional implementation of the MAP. [189]
- **Institutional limitations:** Stakeholders note that more formal structures for regional groups would be necessary to enhance cooperation, which the MAP does not provide. They argue that the lack of a regional structure foreseen in the EU Treaty and the absence of a formalised process, combined with unclear structures and working processes, have hindered the MAP's ability to deliver genuine regionalisation.[190]
- **Diverging interests:** While some BSAC members acknowledge intensive stakeholder interaction and exchange, they note that differing interests in fish stock management often prevent common solutions. For example, semi-industrial trawling is geared towards mass catches, whereas small-scale fishing is geared towards quality.[191] Even among Baltic countries, despite good cooperation, interests can diverge. For example, Sweden's desire to ban large-scale Baltic herring fishing in certain areas is opposed by Finland, where Baltic herring is the most important catch species, and such a ban would severely impact its fishing sector.[192]
- **Geopolitical and external disruptions:** The Commission views the lack of cooperation with Russia as a key challenge, with whom cod, central herring, sprat and salmon stocks are shared. The joint committee for fish-stock management, established by the EU and Russia in 2009, has been inactive since 2019 due to COVID-

186 First Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2020) 494 final, September 2020

187 BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, 2024

188 First Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2020) 494 final, September 2020; Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

189 BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, 2024

190 First Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2020) 494 final, September 2020, and the Commission Staff Working Document accompanying the report SWD(2020) 171 final

191 BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, 2024

192 Interview with SFPO – Swedish Fish Producer Organisation, April-June 2025

19 and Russia's war of aggression against Ukraine. As a result, each party independently sets their TACs, with no shared agreement.[193] The EU adheres to the former International Baltic Sea Fishery Commission (IBSFC) shares, while Russia has consistently set significantly higher TACs. Moreover, Russia has disregarded ICES recommendations by targeting cod, making only minimal cuts to its TAC for central Baltic herring, and failing to submit data to ICES since 2022.[194]

Even among the existing regional platforms, the BSAC[195] calls for greater coordination on specific actions. The BSAC has criticised BALTFISH for focusing most of its attention on annual fishing opportunities – such as quota settings – while not devoting sufficient time on other issues, and has called for more detailed stakeholder involvement when preparing joint recommendations.[196] To address these gaps, BSAC suggests:

- Establishing a joint forum involving the BALTFISH Forum, BALTFISH High-Level Group, and BSAC to discuss management issues, including TACs/quotas, without compromising final national positions,
- Developing a structured format for stronger cooperation between BALTFISH, BSAC, ICES and HELCOM,
- Establishing a regional task force with a strong mandate to help rebuild cod and western Baltic herring. The task force could make swift and adaptive decisions on technical rules and develop an effective long-term strategy, also involving experts and scientists.

Despite these proposals, the BSAC acknowledges the limitations of the current legal and institutional framework, noting that genuine regionalisation would require changes to the current legislation.

193 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

194 BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, BSAC, 2024; Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

195 BSAC, White Paper Implementation and revision of the CFP with a Baltic perspective, report, 2022

196 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024; First Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2020) 494 final, September 2020

3.2. Internal and external coherence of the Baltic MAP

Key findings on coherence of the Baltic MAP	
Internal coherence within the Baltic MAP regulation	
	Overall, the Baltic MAP Regulation is considered by stakeholders as **a relevant regulatory framework for fisheries management in the Baltic Sea region.** However, some **discrepancy is observed** within the **regulation,** as stakeholders point to a notable conflict: Article 4(6) suggests stricter actions, while Article 5 offers a more flexible approach, referring to the possibility, not the obligation, to suspend a targeted fishery, and allow for a case-by-case assessment of appropriate remedial measures. The 2023 Commission's proposal to delete Article 4(6) drawn strong opposition, as it was seen as increasing the risk of stock collapse and undermining the MAP's effectiveness and the fishing industry's viability without proper assessment.
Alignment with EU and Member States policy needs and programmes	
	Overall, **coherence between national policies and the Baltic Sea MAP** has been observed. However, while the Baltic MAP aims for sustainable fisheries, its **narrow focus on stock management is seen as insufficient** for recovery, failing to integrate broader environmental challenges, predator impacts, and other policies. This limited scope leads to conflicts and a **disconnection from crucial spatial planning and environmental protection decisions,** often disadvantaging fisheries and overlooking other sectoral pressures.
	There is a **general coherence between the Baltic MAP and the implementation of EMFAF-funded programmes** across Member States. The EMFAF funds are used to support activities aligned with the MAP, creating a close and complementary relationship that provides crucial funding for its related objectives.
Alignment with year-to-year flexibility rules (CFP Regulation No 1380/2013, Art. 15.9)	
	**Year-to-year flexibility** has been applied and monitored across several Baltic Sea Member States. While some view this **flexibility** as a positive element that helps adapt fishing activities and stabilise the sector, others see it as useful but note limited positive effects, expressing a stronger preference for predictability over flexibility. Flexibility can also be influenced by external factors, such as the Russian embargo in 2014.

To achieve the objectives of the Baltic MAP and prevent conflicting measures or policies, it is essential that policies at all levels – EU, regional and national – are aligned and work in harmony toward common goals. The following section presents findings on the coherence between the Baltic MAP and the policies and programmes of Member States, as well as the application of year-to-year flexibility rules.

3.2.1. Internal coherence within the Baltic MAP regulation

Overall, the Baltic MAP Regulation is considered by stakeholders (through desk research and interviews) to be a relevant regulatory framework for fisheries management in the region. However, there is a perceived inconsistency in the stringency of its regulation, with Articles 4(6) imposing stricter requirements compared to Article 5. Article 4 (6) states: "Fishing opportunities shall in any event be fixed in such a way as to ensure that there is less than a 5 % probability of the spawning stock biomass falling below Blim"[197]. Articles 5.1 and 5.2, however, allow more flexibility. They state that quotas should be set within the FMSY ranges unless the stock is below Blim, in which case lower values or remedial measures apply.

The Commission's proposal to delete Article 4(6) in 2023[198] faced strong opposition from various stakeholders.[199] They argued that the question of what to do once stocks are under MSY Btrigger and Blim was unresolved, and the proposed amendment would have left the Baltic Sea region in a worse position than before, even rendering the entire MAP unnecessary[200]. As researchers at the Stockholm University Baltic Sea Centre stressed, "dropping the 5 % safeguard in Article 4.6 in favour of the 5 % definition in Article 2.2 means increasing the risk for a stock collapse".[201]

Researchers at the Stockholm University Baltic Sea Centre argued that the Commission's proposal was based on a misunderstanding of the MAP and the scientific community. [202] They raised concerns about the lack of impact and scientific assessments, such as by the ICES, of the potential consequences of removing the safeguard for fish stocks prior to the Commission's adoption of the proposal. LIFE association further contended the proposal would undermine 'the socio-economic viability of the fishing industry, in particular the small-scale fleet segment, by removing a key fish stock recovery mechanism'. [203]

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197 Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat

198 European Commission, Fisheries correction to multiannual plans, website, 2023

199 LIFE, LIFE responds to the public consultation on the EC's proposal to modify the MAP, policy position, 2024 https://lifeplatform.eu/life-responds-to-the-public-consultation-on-the-european-commissions-proposal-to-modify-the-multiannual-plan-map-for-the-baltic-sea/C. Berkow, Analysis: Weakening the management of Baltic fisheries, Stockholm University Baltic Sea Centre, 2024; Interview with FishSec April-June 2025; Interview with CCB, April-June 2025. CCB has also initiated a court case in July 2024 about the interpretation of article 4(6) of the Baltic Sea MAP regulation.
See here: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C_202405113

200 Interview with FishSec April-June 2025.

201 C. Berkow, Analysis: Weakening the management of Baltic fisheries, Stockholm University Baltic Sea Centre, 2024

202 C. Berkow, Analysis: Weakening the management of Baltic fisheries, Stockholm University Baltic Sea Centre, 2024

203 LIFE, LIFE responds to the public consultation on the EC's proposal to modify the MAP, policy position, 2024

This proposal was ultimately rejected by the European Parliament's fisheries committee (PECH) on 23 September 2024. [204]

3.2.2. Alignment of the Baltic MAP with EU and Member States' policies and programmes

Coherence between the Baltic MAP and national, regional implementation is maintained through the integration of the MAP's principles into decision-making processes, particularly those concerning sustainable fisheries management.[205] However, the plan's focus on stock management is seen by various stakeholders (producer organisations, national institute of aquatic resources, Managing Authorities (MAs), NGOs) as insufficient to fully support stock recovery and long-term sustainability.

Key areas of incoherence and conflicts arise from:

- **Narrow focus of the MAP and limited integration of other environmental policies:** The MAP's primary mechanism of regulating fishing opportunities fails to address other multiple, interconnected pressures that lead to a poor status of stocks such as environmental challenges (e.g. eutrophication, climate change, habitat loss) and the significant impact of predators (e.g. seals, cormorants) on fish stocks. They highlight that if non-fishing factors are the main cause of stock decline, the MAP alone cannot solve the problem and there is a need to consider other policies and sectors in fisheries management in order to improve the status of the stocks.[206] Furthermore, there are cases of functional separation or limited alignment with broader EU environmental directives (e.g. the Habitats[207] and Birds[208] directives), leading to direct conflicts (e.g. predators harming fish stocks[209]) and hindering a holistic approach to marine

[204] The Parliament's Committee on Fisheries (PECH) voted on 23 September to reject the Commission's proposal to remove essential safeguards for fish populations under MAPs for the Baltic Sea, North Sea, and Western Waters, Committee on Fisheries (PECH), Video, 2024; FishSec, PECH rejects attempt to remove safeguards in management plans, 2024: The PECH Committee's vote ended in a tie, with 13 in favour and 13 against. As a positive majority was needed in order to proceed with the file, the Parliament effectively rejected the Commission's proposal.

[205] Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection; Interview with DE Thünen-Institut; Interview with EE Ministry of Regional Affairs and Agriculture; Interview with LT Ministry of Agriculture; Interview with LV Ministry of Agriculture; Interview with PL Ministry for Agriculture and Rural Development; Interview with FI Ministry of Agriculture and Forestry; Interview with FI Association of Professional Fishermen (SAKL), April-June 2025

[206] Interview with DK Danish Pelagic Producers Organisation; Interview with DK Technical University of Denmark; Interview EE Ministry of Regional Affairs and Agriculture; Interview with PL National Marine Fisheries Research Institute in Gdynia, Interview with SE FishSec, Interview with HELCOM Secretariat, April-June 2025

[207] Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

[208] Directive 2009/147/EC on the conservation of wild birds.

[209] Interview with PL National Marine Fisheries Research Institute in Gdynia, Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection; Interview with SE Swedish Fishermen's Producer Organisation (SFPO), April-June 2025

management.[210] For example, the unintended consequences of the rising grey seal population have created increasingly complex challenges for natural resource managers, intensifying the conflict between seal conservation and fisheries[211], and posing a serious threat to coastal fishing activities in the Baltic Sea.[212]

- **Disconnection from spatial planning and environmental protection decisions:** According to some stakeholders, the MAP operates in isolation from crucial spatial planning and environmental protection decisions,[213] which can often fall outside the fisheries' scope. Sometimes fisheries are portrayed as the main culprit for conservation issues[214], and overlooking pressures from other sectors, such as wind farms and agriculture[215]. This may lead to potential conflicts or a disadvantage when competing for sea space with other sectors, such as offshore wind energy developments.[216] For example, decisions like the designation of large no-take zones in Schleswig Holstein coastal waters in Germany[217] often prioritise non-fishing activities, leading to existential consequences for fishers – particularly small-scale coastal fleets – whose vessels are limited in their operational range.[218] Furthermore, despite the MAP's formal consideration of socio-economic and ecosystem aspects, these factors are frequently overlooked in the Commission's proposals or countries decisions, creating tensions with other policies aiming to balance biological, economic and social factors.[219] For example, the Finnish Association of Professional Fishers notes that while MSC certification is now a requirement for most major customers, increased demands and certification costs do not translate into higher producer

[210] Interview with EE Ministry of Regional Affairs and Agriculture; Interview with PL National Marine Fisheries Research Institute in Gdynia; Interview with PL WWF Baltic Sea; Interview with SE FishSec, April-June 2025

[211] P.Suuronenetal., Reassessing the management criteria of growing seal populations: The case of Baltic grey seal and coastal fishery, Marine Policy, Vol.155, Elsevier, 2023
Interview with EE Ministry of Regional Affairs and Agriculture; Interview with PL Ministry for Agriculture and Rural Development, Interview with PL National Marine Fisheries Research Institute in Gdynia, Interview with German Fisheries Association, Interview with DK DTU Aqua National Institute of Aquatic Resources, April-June

[212] K. Svels et al., Mitigating a social conflict between seal, conservation and fisheries in the Baltic Sea, TemaNord 2022:569, Nordic Council of Ministers, 2022

[213] Interview with the German Fisheries Association; Interview with the PL Ministry for Agriculture and Rural Development, April-June 2025

[214] Interview with DE Ministry for Food and Agriculture; Interview with FI Ministry of Agriculture and Forestry; Interview with DK DTU Aqua National Institute of Aquatic Resources; Interview with LIFE, April-June 2025

[215] Interview with FI Association of Professional Fishers (SAKL); Interview with HELCOM Secretariat; Interview with DK DTU Aqua National Institute of Aquatic Resources, April-June 2025

[216] Interview with DE German Fisheries Association; Interview with LIFE, Interview with LT Lithuanian Ministry of Agriculture, April-June 2025

[217] Zero-use policies in protected areas are not automatically considered effective, as they will not, on their own, save fish stocks or the fisheries sector. Especially regarding cod and herring, marine protected areas in Schleswig-Holstein's coastal waters are unlikely to contribute significantly to stock recovery, since these areas are not crucial to the life cycles of those species.

[218] Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April-June 2025

[219] Interview with LV Ministry of Agriculture; Interview with FI Association of Professional Fishers (SAKL), April-June 2025

prices, and vessels currently lack eligibility for renewed funding for fishing vessels despite increasing environmental demands.

Coherence between the Baltic MAP and the EMFAF

The EMFAF Regulation[220] states the alignment of EMFAF support with the Common Fisheries Policy (CFP) and the objectives of multiannual plans in a few sections, such as under Article 20 (2b) on permanent cessation of fishing activities, and under Article 48 (b), which specifies that EMFAF shall support the CFP's implementation through regional cooperation on conservation measures, particularly within the framework of multiannual plans.

In this context, the EMFF/EMFAF measures support the CFP objectives, and hence also the implementation of the MAP[221], serving as a key funding instrument that works in close combination with it. For instance, it provides financial support for coastal communities, helps fishers transition to sustainable fishing practices, develop more selective fisheries, creates jobs within the blue economy. In their operational programmes, several Baltic Sea Member States use or plan to use this instrument to fund investments in energy efficiency, improve working conditions in fisheries and aquaculture, and tackle short-term challenges faced by fishers and coastal communities, such as the temporary or permanent cessation of fishing activities, compensation for damage caused by protected animals, and the purchase of more selective fishing gear.[222]

Some examples across Baltic Member States are:

- In **Poland and Germany** (Schleswig-Holstein), EMFAF is used for temporary suspension of fishing activities[223], as well as projects like the "roofless net", an innovative bottom trawl design developed by the Thünen Institute to reduce cod bycatch in flatfish-directed fisheries.[224]
- In **Denmark,** DTU Aqua applies for EMFAF funding to support projects connected to the Baltic MAP. This funding is essential and supports initiatives led solely by DTU Aqua or in partnership with fishing organisations. Examples include developing fishing gear that reduces bycatch or conserves fuel. The main goal of these projects is to help fishers in complying with fisheries management objectives by allowing them to fish sustainably without damaging vulnerable fish stocks.[225]

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220 Regulation (EU) 2021/1139 of the European Parliament and of the Council of 7 July 2021 establishing the European Maritime, Fisheries and Aquaculture Fund

221 First Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2020) 494 final, September 2020 Commission Staff Working Document accompanying the second report on the implementation of the Baltic Sea Multiannual Plan, 2024, SWD(2024) 703 final

222 European Commission, Our Baltic declaration – First progress report on commitments, September 2023

223 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection; Interview with PL Ministry of Agriculture and Rural development; Interview with DE Thünen-Institut, April-June 2025

224 Interview with DE Thünen-Institut, April-June 2025

225 Interview with DK Technical University of Denmark, April-June 2025

- In **Latvia,** the EMFAF support is also considered necessary for implementing activities that indirectly support the MAP. These include data collection and scientific assessments (conducted by BIOR), improving fishing selectivity, testing innovative gear, and strengthening management and control measures (including the development of ZIKIS – the Integrated Fisheries Information and Control System), which is a strategic tool for fisheries monitoring and data management, including for MAP purposes.[226]
- In **Finland,** the Natural Resources Institute (Luke) is responsible for collecting data on stocks. EU funding, including EMFAF, has been a significant source of financing for these activities, which are relevant to the Baltic Sea MAP.[227]

3.2.3. Alignment with year-to-year flexibility rules (CFP Regulation, Art. 15.9)

Article 15(9) of the CFP Regulation (EU) No 1380/2013[228] permits **year-to-year flexibility** for stocks subject to the Landing Obligation (LO), allowing a limited quantity of unused fishing quota (up to 10 %) to be transferred from one year to the next. This mechanism aims to provide Member States and operators some flexibility in managing fishing opportunities under the LO, which requires all catches of regulated commercial species to be landed and counted against quotas.

The Commission[229] considers that the sometimes-challenging decisions taken by the Council for the Baltic stocks were enabled by the framework established by the MAP, which combines a safety net and flexibilities. Without a MAP, reaching agreement on measures to help stocks below the limit recover would have been very difficult, and quotas may have been set higher. Conversely, the MAP also provided flexibility for healthy stocks by allowing the use of the upper FMSY range to buffer severe quota reductions.

In the Baltic Sea region, the year-to-year flexibility has been applied across various Member States, such as Germany[230], Finland[231], Poland[232], Latvia[233] and Estonia. While some view this flexibility as a positive element that helps adapt fishing activities and stabilise the sector, others see it as useful but note limited positive effects, expressing a stronger preference for predictability over flexibility. In one instance, a temporary agreement allowed for the transfer of up to 25 % of fishing quotas to

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226 Interview with LV Ministry of Agriculture; Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR", April–June 2025

227 Interview with FI Ministry of Agriculture and Forestry; Interview with FI Association of Professional Fishermen (SAKL), April–June 2025

228 Regulation (EU) No 1380/2013 on the Common Fisheries Policy

229 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

230 Interview with DE German Fisheries Association; Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April–June 2025

231 Interview with FI Ministry of Agriculture and Forestry; Interview with FI Association of Professional Fishermen (SAKL), April–June 2025

232 Interview with PL Ministry of Agriculture, April–June 2025

233 Interview with LV Ministry of Agriculture, April–June 2025

the following year. This exception was introduced in response to the 2014 Russian embargo[234], allowing unused sprat and herring quotas from the open Baltic Sea, the Gulf of Riga and the Gulf of Bothnia to be carried over. By increasing the usual 10 % carry-over limit, the measure aimed to support companies facing market disruptions, giving them more time to find alternative buyers and operate under improved market conditions. This shows how external factors can influence both total landings and the application of flexible management measures.[235]

3.3. Efficiency of the Baltic Sea MAP implementation

Key findings on the efficiency of the Baltic MAP[236]	
	Stakeholders consider the **Baltic MAP a necessary tool** for incorporating regional specificities into EU fisheries management. However, its implementation is also viewed by some stakeholders as **time-consuming and too rigid,** making it difficult to respond swiftly to dynamic ecological changes or unforeseen developments. Key inefficiencies include bureaucratic hurdles, inflexible update cycles, and delays in integrating emerging scientific knowledge into decision-making.
	**Stakeholder opinions diverge on the Baltic MAP's administrative burden,** with some attributing increased workload primarily to the broader Control Regulation and not the MAP itself, citing issues like unclear landing obligations and complex by-catch measures. Others believe the MAP has led to greater bureaucracy and costs, especially for small-scale fisheries, although acknowledging that much of this may largely stem from national implementation decisions.
	The **monitoring system** for the MAP has not increased the workload and is linked to existing EU and national monitoring systems. There are however concerns regarding **misreporting,** lack of **official data from Russia,** lack of integration of **recreational fisheries data** and **insufficient funding** for data collection.

Overall, the consulted stakeholders state that they are unable to exactly assess the efficiency of the MAP implementation. This can be related to the fact that the MAP is not implemented as a separate tool/programme, and therefore, it is not possible to precisely assess the cost or time efficiency

234 "Regulation (EU) No 43/2014 currently allows that a Member State use any unused quantities in 2015, up to 10 % of the quota available to it in 2014, in respect of certain stocks. On 6 August 2014, the Russian Federation imposed an embargo on the importation of certain agricultural and fisheries products from the Union. As a consequence, some of the exports that producers had envisaged to make to Russia in the autumn of 2014 have become impossible and, in some cases, alternative markets cannot be found at short notice. In view of those exceptional circumstances and the urgency of the matter, it is necessary to allow certain adjustments for the 2014 fishing season. In view of positive scientific advice as well as a positive approach of the relevant coastal states, it is appropriate to allow, exceptionally and only in respect of the stocks that are the most severely or directly affected by the Russian embargo, an increase in the percentage of the quantities unused in 2014 that can be carried over to 2015." Council Regulation (EU) No1221/2014; A. Motova & F. Natale, Impacts of the 2014 Russian trade ban on seafood, Joint Research Centre, 2015

235 Keskkonnaministeerium, 2016. aasta Läänemere kalapüügikvoodid said jagatud, 2015

236 The findings on efficient implementation of the MAP primarily relies on interviews

specifically in the context of the MAP.[237] MAP-related activities and costs, resources and workload are closely intertwined with other fisheries management activities, the implementation of national strategies, and the fulfilment of broader EU legal obligations beyond the MAP itself.[238]

The following sub-sections presents some of the main aspects highlighted by the stakeholders that have affected the efficient implementation of the Baltic MAP.

3.3.1. Implementation of the Baltic Sea MAP

The Baltic MAP is seen as a necessary framework for fisheries management. The MAP has allowed the incorporation of regional specificities into fisheries management, and has made the quota-setting process more transparent for Member States and stakeholders[239]. The Commission also notes that without the MAP, it would have been more challenging to agree on TACs that are both coherent and aligned with the CFP's objectives. [240]

However, deciding on quotas/fishing opportunities requires the involvement of actors on multiple levels, which exercise different types of power to influence policy making on fishing opportunities in the Baltic Sea,[241] which can be time-consuming. Moreover, the MAP often proves too **rigid to respond swiftly to dynamic ecological changes** or integrate new scientific knowledge into decision-making processes.[242] An example is the delayed implementation of the "roofless net" developed by the Thünen Institute to reduce cod bycatch. Despite BALTFISH agreement reached, its implementation at the EU level was delayed for several years due to a lack of consensus on whether to introduce the measure through a delegated act or by amending the technical regulation. This illustrates how legal disagreements can significantly slow down the adoption of technical innovations.[243]

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237 Interview with DK Technical University of Denmark, April-June 2025, Interview with LV MoA, April-June 2025

238 Interview with LT Ministry of Agriculture, April-June 2025

239 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

240 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

241 T. Salander, Fishing for Influence Dynamics of power in the policy making of Baltic Sea fishing opportunities, Uppsala University, 2024

242 Interview with DE German Fisheries Association; Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection; Interview with LT Ministry of Agriculture, April-June 2025

243 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April-June 2025; According to the interview with DE Thünen-Institut, many years passed before the implementation of this net, with the majority of the time spent on administrative decision-making processes rather than technical development.

Workload of implementing the Baltic MAP

Stakeholder opinions on the **administrative burden of the Baltic MAP vary.**

Some stakeholders note that estimating the increased workload and costs from the Baltic MAP is difficult, since the plan is implemented within the framework of other fisheries management activities, national strategies, and the fulfilment of EU legal provisions (other than MAP).[244]

Some state that the Baltic MAP itself has not significantly increased bureaucracy. Additional workload is primarily linked to the **broader EU system, particularly the Control Regulation,** such as informing the landing harbour one hour before arrival, extensive controls and landing requirements.[245] Rules regarding LO and discards are also perceived as unclear and impractical, resulting in confusion and inefficiencies. [246] Moreover, efforts to limit by-catches are hampered by long and bureaucratic processes, making fishing bans for specific areas and species simpler to implement. Yet, such specific bans are not always effective, as fish are mobile and can easily move beyond protected areas.[247]

Other stakeholders argue the MAP has not led to significant procedural simplification in fisheries management.[248] Some even believe that it has led to an **increased workload, costs and bureaucratic complexity,** particularly for SSCF.[249] However, they also note that such increased administrative burden **may be primarily driven by national decisions** rather than by the MAP itself. Some examples include: excessive documentation, control requirements, and reporting obligations, which also lead to increased queries for public authorities (PL)[250], such as logbooks requirements (from 8m vessel length), up to 20 % of landings requiring inspection despite a shrinking fleet (DE)[251], as well as long legalisation processes (LT)[252].

Monitoring and reporting system

The MAP does not foresee its own data collection; instead, fisheries data collection is governed by the EU Data Collection Framework (DCF), as outlined in Regulation (EU) 2017/1004. In the Baltic Sea Member States, data collection under the MAP is carried out either through existing EU-wide

244 Interview with LT Ministry of Agriculture, Interview with LV Ministry of Agriculture, Interview with PL Ministry of Agriculture and Rural Development April–June 2025

245 Interview with DE German Fisheries Association, Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, Interview with PL Ministry for Agriculture and Rural Development, April–June 2025

246 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April–June 2025

247 Interview with SE Swedish Fishermen's Producer Organisation (SFPO), April–June 2025

248 Interview with LV Ministry of Agriculture, April–June 2025

249 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April–June 2025

250 Interview with the PL Ministry of Agriculture, April–June 2025

251 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection, April–June 2025

252 Interview with LT Ministry of Agriculture, April–June 2025

systems or national systems.[253] Thus, there is no evidence that the MAP has led to the establishment of additional monitoring structures. For example:

- In **Germany,** the implementation of measures like the LO and quota management was integrated into existing systems without creating additional complexity.[254]
- In **Denmark,** the overall data collection is considered very good, although a significant gap remains due to the lack of data from Russia since 2022.[255] The national institute of aquatic resources, DTU Aqua, highlights that data collection in the Baltic Sea is well-coordinated across countries based on regional guidelines, ensuring consistency for stock assessments. There is continuous adaptation to new data requirements, such as genetics.
- In **Latvia,** the monitoring of MAP implementation largely builds on data collection carried out by BIOR and on the ZIKIS system[256], which enable a high-quality and integrated approach.[257]
- In **Lithuania,** data is collected under the Data Collection Framework (DCF), covering biological data on fish stocks, fishing fleet activities, economic performance, environmental impacts and recreational fishing.[258]
- In **Poland,** a multi-annual data collection programme is implemented by the Maritime Research Institute based on general EU legislation and not specifically linked to the MAP.[259] Any additional research commissioned by the Institute (e.g. to respond to questions from policymakers) is not connected with the MAP.[260]

There are however concerns related to reporting such as:

- **Misreporting:** According to the Commission, there are indications of substantial misreporting of catches of pelagic species, which may weaken the accuracy and reliability of pelagic stocks assessments and contribute to hidden overfishing.[261] However, the Commission states that while scientific advice acknowledges the impact

253 Interview with EE Ministry of Regional Affairs and Agriculture; Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR", April-June 2025

254 Interview with DE German Fisheries Association, April-June 2025

255 Interview with DK Technical University of Denmark, April-June 2025

256 ZIKIS (Integrated Fisheries Information and Control System) is Latvia's nationwide fisheries management and accounting tool. It enables for example the electronic entry of fishing data and logbooks, port declarations and landing notifications, accounting for quota utilisation, the transmission of data to control authorities and the European Commission, Interview with LV Ministry of Agriculture, April-June 2025

257 Interview with LV Ministry of Agriculture, April-June 2025

258 Interview with LT Ministry of Agriculture, April-June 2025

259 Interview with PL Ministry for Agriculture and Rural Development, April-June 2025

260 Interview with PL Marine Fisheries Research Institute in Gdynia, April-June 2025

261 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024; Council of the European Union, Baltic Sea Council agrees on catch limits for 2025, press release, 2024

of misreporting, it has not yet been able to measure the effect.[262] ICES reports confirm that misreporting of herring and sprat is an ongoing problem, despite some corrections in catch time-series, and that it undermines data quality and introduces uncertainties into assessments.[263] According to ICES, Danish catch data for herring and sprat was corrected for misreporting and included in the updated assessments. However, corrections for other countries' misreporting still need to be addressed.[264] In Germany, according to the Thünen-Institut, some data show consistent discrepancies between reported and inspected volumes of below minimum size (BMS) fish. [265]

- **Lack of data from Russia:** Since Russia has not officially reported data on catches since 2022, only publicly available data is used. Russia sets its TACs independently that do not align with MSY and disregard the best available scientific advice.[266]
- **Lack of recreational fisheries data:** The BSAC suggests that Member States in the Baltic, in collaboration with ICES, improve the process and method of data surveys sampling and data sharing, including recreational fisheries data.[267]
- **Insufficient funding for data collection:** According to DTU Aqua[268], EU funding for data collection has not been adjusted for inflation for several years, leading to potential reductions in crucial research cruises where essential data is gathered. Moreover, fully implementing an ecosystem-based approach to fisheries management would need a more complex and costly data collection framework, which would require additional financial support.[269]

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262 Council of the EU, Baltic Sea Council agrees on catch limits for 2025, press release, 2024; FishSec, A Baltic Sea in crisis: Why EU ministers must apply a precautionary approach to fishing opportunities this time, 2024

263 ICES,Sprat (Sprattus sprattus) in subdivisions 22–32 (Baltic Sea), ICES Advisory Committee report, 2024; ICES, Herring (Clupea harengus) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea), ICES Advisory Committee report, 2023

264 ICES,Benchmark Workshop on Baltic Pelagic Stocks (WKBBALTPEL), ICES Scientific Report, 2023

265 Interview with DE Thünen-Institut, April-June 2025. In Germany fishing accounts for 0.3 % of Below Minimum Size (BMS) volume and all fishers always have the same amount. During an inspection, 12 % is recorded, while the logbook shows 0.3 %.

266 ICES 2023 report Herring (Clupea harengus) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). Replacing advice provided in May 2023
Interview with Coalition Clean Baltic, Interview with FISHSEC, Interview with DK DTU Aqua National Institute of Aquatic Resources, Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR", Interview with the Stockholm University Baltic Sea Centre, April-June 2025

267 BSAC, White Paper Implementation and revision of the CFP with a Baltic perspective, report, 2022

268 Interview with DK DTU Aqua National Institute of Aquatic Resources, April-June 2025

269 Interview with SFPO – Swedish Fish Producer Organisation, April-June 2025

3.4. Relevance of the Baltic MAP

Key findings on the relevance of the Baltic MAP

Relevance of the objectives of the Baltic MAP (Article 3) and responsiveness of the Baltic MAP to a changing environment
 The objectives set out in the Baltic MAP Regulation (EU) No 2016/1139 for sustainable fisheries management continue to be important. Some amendments have also been made to respond to new scientific advice (e.g. Regulation (EU) 2018/976 amending Regulation (EU) No 2016/1139 to update fishing mortality reference points). However, the MAP has not sufficiently evolved to address **changing conditions.** The deteriorating ecological state of the Baltic Sea has limited the feasibility of achieving these objectives, resulting in a regulatory framework that does not adequately reflect current environmental and socio-economic realities.
Relevance of the ecosystem-based approach
 The **ecosystem-based approach** is formally referenced in the Baltic MAP, but stakeholders widely regard its implementation as limited due to a lack of clear understanding of the approach, insufficient data and inadequate integration into decision-making. Stakeholders emphasise that current annual quota settings often prioritise political considerations over a holistic ecosystem perspective, hindering long-term stock recovery and the effective implementation of ecosystem-based management.

The Baltic MAP was introduced to provide a stable and predictable framework for the sustainable management of key fish stocks in the region. Given the increasing impact of environmental changes – such as rising sea temperatures, altered salinity, low oxygen levels, and broader effects of climate change – it is essential to assess whether the MAP remains relevant in a rapidly evolving ecological context.

The following section presents findings on the relevance of the Baltic MAP, its application of the ecosystem-based approach, and stakeholder perceptions regarding the extent to which the MAP continues to address the needs of a changing environment.

3.4.1. Relevance of the objectives of the Baltic MAP (Article 3) and responsiveness of the Baltic MAP to a changing environment

The objectives set out in **the Baltic MAP Regulation (EU) No 2016/1139 remain relevant.** Some amendments to this regulation have been made to respond to new developments in the sector and scientific advice (e.g. Regulation (EU) 2018/976 amending Regulation (EU) No 2016/1139 to update fishing mortality reference points – see also Section 2.2).

However, stakeholders widely consider the Baltic MAP's ability to respond to a **rapidly changing environmental context** to be limited. Its responsiveness is significantly constrained by a complex interplay of **diverse environmental pressures and socio-economic impacts,** including:

- **Climate change:** Water temperature, salinity, and stratification are shifting due to climate change, affecting the growth, distribution, and abundance of species, with ecosystem-wide impacts on fisheries. Heatwaves are increasing, intensifying stratification, and reducing bottom oxygen levels, especially in shallow waters (less than 20 m deep). The extent of sea ice has been declining since the 1980s, reducing habitat for ice-dependent species, such as the ringed seal.[270]
- **Environmental and socio-economic context:** Eutrophication has altered the ecosystem, increasing phytoplankton and cyanobacterial blooms since the late 1970s. While some improvements have been observed in addressing eutrophication[271], HELCOM's integrated assessment of eutrophication status indicates that eutrophication remains a major problem in the Baltic Sea.
  Moreover, while fishing itself impacts the ecosystem through the selective extraction of species, major pressures also come from agriculture, forestry and wastewater, resulting in nutrient enrichment across the region. Contaminants originate mainly from shipping (52 %), wastewater discharge (26 %), and land-based industry (20 %), with long-term, cumulative effects on marine life. Emerging persistent organic pollutants are a growing concern in the Baltic Sea. The Commission quoted in their first report that in the case of cod in the eastern Baltic Sea, scientists assume that three times more fish die from environmental pressures than from fishing itself[272], highlighting the severe impact of pollution on fish stocks. Furthermore, as the 2024 ICES Baltic Sea ecosystem overview[273] highlights, environmental degradation poses a significant threat to coastal and marine tourism, the largest sector of blue economy, which generates €33.7 billion annually. This degradation is estimated to reduce annual recreational benefits by €9 billion, underscoring substantial potential economic losses.
- **Some other issues** include the environmental impact from dumped munitions (e.g. unexploded ordnance in the south-western part of the Baltic Sea has released approximately 3 000 kilograms of dissolved toxic chemicals[274]), and the offshore wind farms. To address the issue of dumped munitions in the Baltic Sea, in 2024 the Commission launched a pilot project[275] to develop new unexploded ordnance removal

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270 ICES, Baltic Sea Ecoregion – Ecosystem Overview, 2024; HELCOM, Basic Facts

271 John Nurminen Foundation, HELCOM: The state of the Baltic Sea remains Worrying – the sea needs our help, 2024

272 First Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2020) 494 final, September 2020

273 ICES, Baltic Sea Ecoregion – Ecosystem Overview, 2024

274 Beck, A. J., et al., *Widespread environmental contamination from relic munitions in the southwestern Baltic Sea.* Chemosphere, 2025
GEOMAR, Environmental Impact of Unexploded Ordnance in the Baltic Sea, 2025

275 CINEA, New pilot project call proposals to reduce danger munitions in European-seas, 2024

technologies and enhance coordination among authorities, researchers and industry.[276] Offshore wind farms currently exert low pressure but are expected to experience large-scale expansion in the future, affecting marine spatial planning, including marine protected areas, interacting with shipping and fisheries[277], increasing spatial competition and potential displacement for fisheries[278].

In this context, stakeholders widely consider that the MAP framework is too rigid to effectively respond to rapidly changing environmental conditions and scientific developments.[279] Stakeholders highlight that its current mechanisms are overly static and require a lengthy approval process,[280] relying on outdated or incomplete data due to biological uncertainty and environmental fluctuations,[281] and lack the flexibility needed to integrate real-time ecological changes into management decisions. There is also a recognised need to involve other relevant policy areas[282] to improve stock status and ensure a more adaptive and integrated approach.

As mentioned in previous sections, it is stressed that regulating fishing alone is insufficient to restore the fish stocks, and without integrating environmental requirements or effective implementation tools, the MAP remains only a partially effective solution.[283] Even reduced or suspended fishing activities alone may not result in stock recovery, particularly where other environmental pressures mentioned above remain unaddressed.

Some stakeholders note the rigid procedural structure and the absence of mechanisms for real-time adjustments of the MAP[284], such as a crisis management mechanism to deal with unexpected ecosystem changes[285] or a science task force that can trigger immediate changes in response to new

276 European Parliament, Answer given by Mr Kadis on behalf of the European Commission, 2025

277 ICES, Baltic Sea Ecoregion – Ecosystem Overview, 2024

278 EASME, Overview of the effects of offshore wind farms on fisheries and aquaculture, Final Report, 2021; European Parliament, Answer given by Mr Sinkevičius on behalf of the European Commission, 2021

279 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection; Interview with DE German Fisheries Association; Interview with LT Ministry of Agriculture; Interview with LV Ministry of Agriculture; Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR", April-June 2025

280 Interview with DE Ministry of Agriculture, Rural Areas, Europe and Consumer Protection; Interview with DE German Fisheries Association; Interview with LT Ministry of Agriculture; Interview with LV Ministry of Agriculture; Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR"; Interview with PL National Marine Fisheries Research Institute in Gdynia, April-June 2025

281 Interview with LV Ministry of Agriculture; Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR", April-June 2025

282 Interview with EE Ministry of regional affairs and agriculture, April-June 2025

283 Interviews with stakeholders in Baltic Sea region, April-June 2025

284 Interview with LV Ministry of Agriculture; Interview with DE German Fisheries Association, April-June 2025

285 Interview with LT Ministry of Agriculture, April-June 2025

findings[286]. A more flexible, evidence-based management approach would help ensure that new findings and scientific input are integrated into management decisions in a timely manner.[287]

3.4.2. Relevance of the ecosystem-based approach

The Baltic MAP refers to the ecosystem-based approach, but its practical application remains limited. Several stakeholders highlight challenges in definition, data requirements and integration into decision-making, as illustrated below:

- There is a need for a **clear and shared understanding** of what the ecosystem approach entails, as interpretations differ among stakeholders[288] – until a common, clear, and overarching definition is established, its practical application within the MAP will be challenging.[289]
- The **rapid environmental changes** make it difficult for the current MSY model to reliably adapt an ecosystem-based approach. More elements and data requirements need to be incorporated into scientific stock assessment models, often beyond what is currently available.[290] Currently, there is more discussion about ecosystem-based management than there is actual implementation of it.[291] Furthermore, a significant challenge lies in the lack of tools to effectively assess the impact of implemented measures. For instance, some measures, such as seasonal closures in the Baltic Sea, are not always grounded in robust scientific evidence and lack accompanying monitoring programmes to assess their effects. This is particularly problematic for demersal fishery, especially for small-scale fisheries, which rely on year-round fishing opportunities. [292]
- **Lack of mechanisms** to effectively integrate broader ecosystem factors and the management context into decision-making limits the implementation of the ecosystem-based approach in the MAP.[293] The current MSY approach and fishing

[286] Interview with DE German Fisheries Association, April-June 2025

[287] Interview with DE German Fisheries Association, April-June 2025

[288] Interview with DE Thünen-Institut; Interview with HELCOM Secretariat, April-June 2025

[289] Interview with DE German Fisheries Association, April-June 2025

[290] Interview with various stakeholders in the Baltic Sea, April-June 2025 (e.g. WWF Baltic Sea Programme, DK Danish Pelagic Producers Organisation, DK DTU Aqua National Institute of Aquatic Resources, EE Fisheries Policy Department, Ministry of Regional Affairs and Agriculture, German Fisheries Association (Original name: Deutscher Fischerei Verband (DFV))

[291] Interview with DK Danish Pelagic Producers Organisation, April-June 2025; Danmarks Fiskeriforening, Fiskerne betaler prisen for årelangt politisk svigt i Østersøen, 2023; Interview with SE Swedish Fishermen's Producer Organisation (SFPO), April-June 2025

[292] Interview with DK Danish Pelagic Producers Organisation, April-June 2025; Danmarks Fiskeriforening, Fiskerne betaler prisen for årelangt politisk svigt i Østersøen, 2023; Interview with SE Swedish Fishermen's Producer Organisation (SFPO), April-June 2025

[293] Interview with LV Ministry of Agriculture; Interview with PL WWF Baltic Sea, April-June 2025

restrictions do not adequately consider these aspects[294], and there are no instruments that allow for a flexible integration of broader factors into annual decisions.[295]

- The **yearly quotas and restrictions** are also viewed by some stakeholders as being driven more by political considerations and trade-offs than by environmental concerns or a holistic ecosystem-based approach.[296] Although management decisions are made annually, some species are not recovering even in the absence of fishing.[297] The reliance on short-term, single-year decision-making rather than long-term management, recovery measures, and ecosystem-based solutions risks undermining the concept of MSY, which aims to maintain fish stocks at sustainable levels over time.[298]

3.5. Added value of the Baltic MAP: MAP vs. no-MAP scenario

Key findings on the added value of the Baltic MAP	
Baltic MAP vs. no-MAP scenario	
	Most stakeholders acknowledge that the **EU framework and the Baltic MAP have not fully delivered on their objectives.** Still, they believe that progress would have been even worse or more limited without the EU regulatory framework and the MAP. **Improvements were particularly evident in policy coherence, regional alignment and adherence to scientific advice,** although a lack of flexibility and an insufficient ecosystem-based approach remain areas of concern.

3.5.1. Baltic MAP vs. no-MAP scenario

Overall, stakeholders consulted through interviews and desk research consider the MAP relevant for the Baltic Sea region. However, applying the MAP has proven challenging, especially as the Baltic Sea's environment and fish stocks continue to decline.

294 Interview with HELCOM Secretariat; Interview with LV Ministry of Agriculture; Interview with PL WWF Baltic Sea, April-June 2025

295 Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR"; Interview with PL Ministry of Agriculture, April-June 2025

296 BSAC, BSAC reply to the European Commission open feedback on the proposed changes to the Baltic Multiannual Plan (MAP), BSAC report, 2024; Interview with PL Producers and Boat Owner's Organisation (member of the LIFE Platform), April-June 2025

297 Interview with SE FishSec, April-June 2025

298 Interview with SE FishSec; Interview with DK Danish Pelagic Producers Organisation, April-June 2025; MOF, Alm.del – 2023-24 – Bilag 17: Grundnotat om fiskerimuligheder for Østersøen 2024, KOM (2023) 0492

Many stakeholders highlight that the MAP's key objectives (achieving MSY, improving stock status, and enhancing regional cooperation) have not been fully met.[299] The Coalition Clean Baltic[300] even argues that the 2013 reform of the Common Fisheries Policy (CFP) improved things more than the Baltic MAP, as it included a number of implementation-related issues.

Nonetheless, there is broad consensus that progress would have been even more limited without the MAP and the overarching EU framework[301], with some stakeholders emphasising that, in the absence of such a common framework, progress would have been more complex, time-consuming and uncoordinated.[302]

Without the EU framework, countries might have prioritised national interests, potentially failing to agree on shared goals, such as sustainable fishing pressure.[303] Some acknowledge that the MAP has improved the political decision-making culture and cycle and has increased political awareness of scientific advice, even if outcomes remain limited.[304] Some stakeholders[305] note that while all Member States use scientific advice from ICES and other sources, the MAP has played a crucial role in integrating that advice into actual decision-making. Without the MAP, adherence to scientific guidance would likely be weaker, as there would be no formal requirement to consider specific indicators or implement harmonised safeguard measures. [306]

From the Commission's perspective, the MAP provides significant added value by serving as a helpful tool for implementing the CFP, particularly in establishing transparent rules for regionally adapted fisheries management and in setting upper limits for TACs based on scientific assessments while allowing flexibility for healthy stocks. Crucially, the plan provides a safety net for stocks under pressure, ensuring minimum quota reductions and additional measures to aid their rebuilding.[307] Moreover, as noted by the Commission, agreeing on TACs that are coherent and consistent with the CFP's objectives would have been more challenging without the Baltic MAP.[308]

Conversely, some argue that outcomes would have been similar without the MAP, as the core objectives – such as restoring and maintaining stocks above MSY – are already embedded in the

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299 Interview with Coalition Clean Baltic; Interview with EE Ministry of Regional Affairs and Agriculture; Interview with PL Ministry for Agriculture and Rural Development; Interview with Sweden University Baltic Sea Centre, FishSec, April-June 2025; BSAC, BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea, report, 2024

300 Interview with Coalition Clean Baltic, April-June 2025

301 Interview with EE Ministry of Regional Affairs and Agriculture; Interview with LT Ministry of Agriculture; Interview with LV Ministry of Agriculture; Interview with PL Ministry for Agriculture and Rural Development, Interview with Sweden University Baltic Sea Centre, etc. April-June 2025

302 Interviews with LV Ministry of Agriculture; Interview with PL Ministry for Agriculture and Rural Development, April-June 2025

303 Interview with DK Danish Pelagic Producers Organisations-DPPO, Interview with Technical University of Denmark; Interview with LV Ministry of Agriculture; Interview with LV Institute of Food Safety, Animal Health and Environment "BIOR"; Interview with PL Ministry for Agriculture and Rural Development, April-June 2025

304 Interview with Coalition Clean Baltic; Interview with Sweden University Baltic Centre; Interview with LV Ministry of Agriculture, April-June 2025

305 Interview with LV Institute of Food Safety; Interview with Animal Health and Environment "BIOR", April-June 2025

306 Interview with LV Institute of Food Safety; Interview with Animal Health and Environment "BIOR", April-June 2025

307 First Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2020) 494 final, September 2020; Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

308 Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

2013 reform of the CFP (e.g. CFP Regulation (EU) No 1380/2013, Article 2).[309] They also note that the MAP has not changed the frequency or nature of regional cooperation[310] and that some of its mechanisms remain overly rigid, detailed, or lack flexibility. [311]

The BSAC also notes the MAP's failure to achieve MSY TACs or effectively address critical stock issues. According to its members, implementation is hindered by complex factors such as the mixed-fisheries context with increasingly weak stocks, compounded by ecosystem changes and external factors[312], potential misreporting, and Russia's non-compliant TAC setting.[313]

309 Interview with FishSec, April-June 2025

310 Interview with the Swedish Fish Producer Organisation (SFPO), April-June 2025

311 Interview with FI Association of Professional Fishers; Interview with LV Ministry of Agriculture, April-June 2025

312 Interview with Baltic Sea stakeholders, April-June 2025

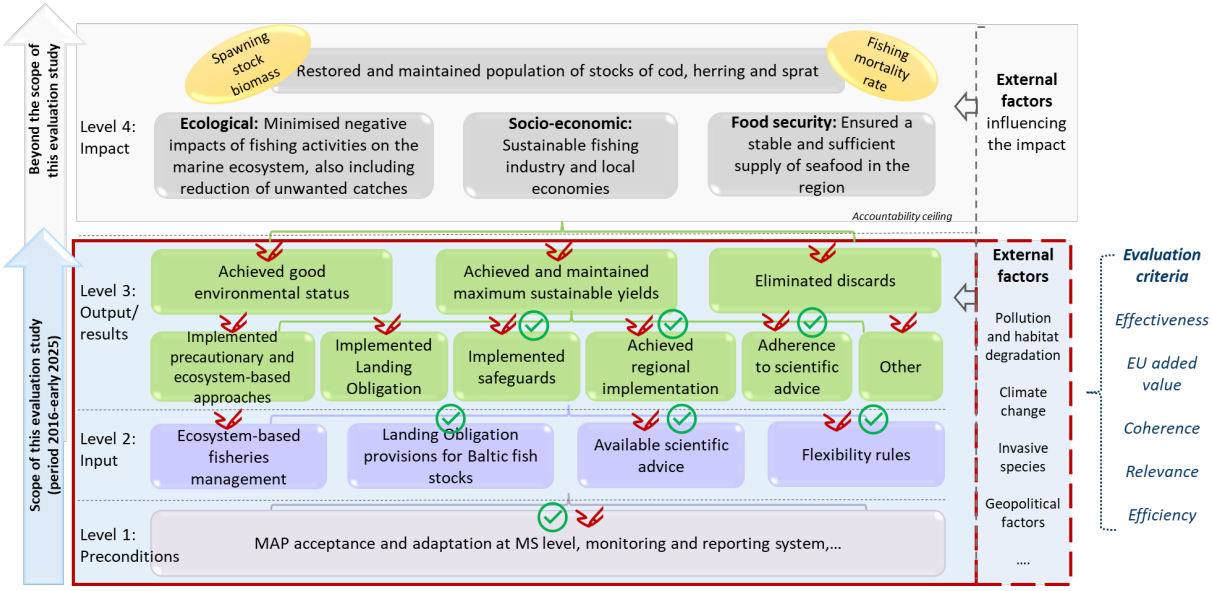
313 Stakeholders consulted for the Second Report on the Implementation of the Baltic Sea Multiannual Plan, COM(2024) 703 final, September 2024

4. Conclusions and recommendations

4.1. Conclusions

This evaluation study assessed the implementation of the Baltic MAP against five key criteria: effectiveness, coherence, relevance, efficiency, and EU added value. Based on the main findings, the following conclusions have been drawn. The schematic impact model below illustrates the actual implementation of the Baltic MAP, with the green symbol [✓] indicating aspects that have been working well and with the red pen [✎] indicating areas requiring improvement.

Figure 11 – Schematic impact model of the Baltic MAP implementation, actual state based on the findings



Source: M&E Factory 2025

Main conclusion on the **effectiveness** of the Baltic MAP:

- *Limited achievements of Baltic MAP objectives:* The Baltic MAP aims to restore fish stocks above Maximum Sustainable Yield (MSY) levels, eliminate discards, and contribute to Good Environmental Status. However, these objectives have largely not been met. Key stocks such as cod and herring remain below critical biomass thresholds, with compromised reproductive capacity and resilience. The overall environmental status of the Baltic Sea shows little improvement, and in some cases has deteriorated, indicating the MAP has not yet fulfilled its primary goals. Stakeholders widely express concern that MSY-based models and TAC settings fail to reflect the rapidly changing dynamics of the marine ecosystem.
- *Limited application of precautionary and ecosystem-based fisheries management:* Although the MAP formally incorporates the precautionary principle and ecosystem-based fisheries management, their practical application has been inconsistent.

Stakeholders highlight inconsistencies in applying precautionary measures, particularly when TACs have exceeded ICES advice even in situations of high uncertainty, contributing to unsustainable exploitation of stocks. Similarly, ecosystem-based management is hindered by the incomplete integration of broader marine pressures such as eutrophication, hazardous substances, predator impacts, and climate-driven changes. As a result, the MAP still largely operates on a single-species basis, missing opportunities for a more adaptive, holistic approach.

- *Improved adherence to scientific advice, but discrepancies persist:* The gap between TACs and ICES recommendations has narrowed since 2016, demonstrating a positive trend towards evidence-based management. However, TACs continue to be above ICES advice (e.g. in 2021 around 30 % of TACs), despite concerns about the poor status of the stocks. Discrepancies also continued in recent years (e.g. Council's decision on central Baltic herring TACs against 2024 ICES advice), stressing ongoing conflicts between environmental and socio-economic concerns.
- *Weak implementation of Landing Obligation (LO):* Although the LO for the Baltic MAP fish species came into force on 01 January 2015, its effectiveness in eliminating discards has been limited. This is mainly due to its weak implementation, enforcement challenges, a complex regulatory framework, and practical difficulties for fishers, resulting in continued illegal discarding despite efforts.
- *Safeguard measures implemented, but their effectiveness is challenged:* Member States have applied various safeguards such as fishing bans, gear restrictions and seasonal closures. However, their overall effectiveness has been sometimes constrained by issues including ill-timed application and enforcement challenges.
- *Regional implementation:* While the MAP provides a legal framework for regional cooperation, its full potential is not being entirely realised due to limited resources, lack of formal structures, weak coordination and diverging national interests.
- *Negative socio-economic impact, especially on small-scale fisheries:* The Baltic Sea fisheries sector has faced sharp declines in fleet capacity (-25 %), employment (-28.5 %), and profitability (Gross Profit -48 %). The small-scale coastal fleet (SSCF) was particularly hard hit, with a disproportionate share of job losses and a severe drop in profitability (-371 %), indicating the MAP's failure to adequately protect this crucial segment of the industry. In some cases, small-scale fishers also face disproportionate challenges due to decisions that often overlook their specific needs (e.g. seasonal closures, designation of large no-take zones).
  Furthermore, the instability in quota setting and a lack of long-term planning contribute to making the sector less attractive to younger generations, thus weakening community resilience. The unpredictability of political decisions on fishing opportunities tends to discourage investments and deter younger generations from entering the sector.

Main conclusion on the **coherence** of the Baltic MAP:

- *Regulatory discrepancies:* Stakeholders note conflict within the Baltic MAP regulation which create ambiguity in enforcement, namely between Article 4(6), which calls for

stricter measures, and Article 5, which refers to the possibility, not the obligation, to suspend a targeted fishery, allowing for a case-by-case assessment of appropriate remedial measures.

- *The MAP is broadly coherent with national policies and benefits from EU funding instruments such as EMFAF*. However, the plan alone is insufficient to address multifaceted ecosystem pressures including climate change, eutrophication, and predator-prey dynamics.
- *Flexibility provisions yield mixed views:* While year-to-year flexibility provisions are generally applied and seen by some as beneficial for adapting fishing activities, others perceive them as having limited positive effects and prioritise predictability over flexibility.

Main conclusion on the **relevance** of the Baltic MAP:

- *Core objectives remain relevant, but plan lacks adaptability:* The objectives set out in the Baltic MAP Regulation for sustainable fisheries management continue to be important. Some amendments have also been made to respond to new developments in the sector and scientific advice. However, the plan has not evolved adequately to address new scientific insights and rapidly changing environmental and socio-economic conditions. The ecosystem-based approach remains largely unimplemented due to unclear definitions, limited understanding, and absence of effective mechanisms to integrate broader ecosystem factors into decision-making.

Main conclusion on the **efficiency** of the Baltic MAP:

- *Design vs. implementation:* While stakeholders generally view the MAP as a necessary tool for integrating regional specificities into EU fisheries management, its implementation is often seen as time-consuming and too rigid to respond quickly to dynamic environmental challenges. Key inefficiencies arise from bureaucratic hurdles, inflexible update cycles for the MAP itself, and significant delays in integrating emerging scientific advice and developments into policy and practice.
- *Workload and bureaucracy:* Stakeholder opinions diverge on the MAP's administrative burden, with some attributing increased workload primarily to the broader Control Regulation and not the MAP itself, citing issues like unclear landing obligations and complex by-catch measures. Others believe the MAP has led to greater bureaucracy and costs, especially for small-scale fisheries, although acknowledging that much of this may largely stem from national implementation decisions.
- *Monitoring and reporting system:* The MAP's monitoring system is efficient, does not significantly increase workload, and effectively leverages existing EU and national data collection frameworks. There are however concerns regarding misreporting, lack of official data from Russia, lack of integration of recreational fisheries data and insufficient funding for data collection.
  Some stakeholders also raise concerns about the lack of transparency and early engagement in the advice formulation process, as well as insufficient cooperation

between scientists and fishers for better data collection. Moreover, the effective implementation of an ecosystem-based fisheries management approach would require greater data volume and complexity, especially on environmental drivers and non-fishing pressures.

Main conclusions on the **added value** of the Baltic MAP:

- *Essential framework for the Baltic Sea, despite shortcomings:* Despite the Baltic MAP not fully meeting its objectives, there is broad consensus that progress in sustainable fisheries management, regional alignment and adherence to scientific advice would have been significantly worse or more limited without it. The MAP has improved political awareness of scientific advice and provided a crucial framework for regionally adapted management. However, a few stakeholders argue its added value, beyond defining terms and reference points, is limited given that its core objectives are already part of the Common Fisheries Policy (CFP), and that it has not fundamentally changed regional cooperation.
- *Some factors* hindering the MAP's full potential are unaddressed ecosystem changes, mixed fisheries, potential misreporting, and, to some extent, non-compliant TAC setting by non-EU actors (e.g. Russia).

4.2. Recommendations

Drawing on findings from desk research and interviews with a wide range of stakeholders, the following key recommendations are proposed to support improvements – or, where necessary, a revision – of the Baltic MAP. Each recommendation is accompanied by the relevant actors best positioned to initiate, implement or drive the suggested actions.

4.2.1. Existing Baltic MAP

Regulatory framework and implementation aspects	
	**1. Clarify ambiguities within the Baltic MAP Regulation** The study notes some discrepancy that exists between Article 4(6) and Articles 5(1) and 5(2) of the Baltic MAP Regulation: Article 4(6) mandates stricter, more immediate actions in response to threats to stock sustainability (e.g. when scientific advice indicates that fishing mortality targets are not met), while Articles 5(1) and 5(2) present a more flexible approach, framing the suspension of a targeted fishery as a possibility rather than an obligation, and allowing for remedial measures to be considered on a case-by-case basis. This ambiguity – stemming from the Baltic MAP Regulation (EU) No 2016/1139 and highlighted by subsequent amendments and the 2023 Commission's proposal to remove the 5 % safeguard clause – has caused differing interpretations among

	stakeholders, and persistent confusion regarding the implementation of precautionary measures, particularly when stock biomass approaches critical reference levels. In this context, the Parliament could recommend that the European Commission **develop a legal guidance note** clarifying the practical application of Articles 4(6) and 5 of the Baltic MAP Regulation to ensure consistent and clear implementation of precautionary and remedial measures. **Involved actors:** European Commission, in coordination with the European Parliament (PECH committee), Council of the EU, Baltic Sea Member States, ICES/scientific community, regional cooperation bodies (e.g. BALTFISH, BSAC)
	**2. Strengthen coherence with EU directives, policies and regional initiatives** The study emphasises that achieving Good Environmental Status (including healthy fish stock status) requires a holistic approach that extends beyond the Baltic MAP. Given that non-fishing factors significantly affect stock dynamics, the MAP, as a fisheries management tool, cannot address the problem alone, and better coordination with related marine environmental frameworks (e.g. MSFD) is essential. The European Commission could be tasked to launch **a comprehensive, in-depth study** concerning the alignment between the Baltic Sea MAP and pertinent European Union frameworks (e.g. Marine Strategy Framework Directive, Nature Restoration Law, Birds and Habitats Directives), macro-regional and sea basin strategies, and other funding frameworks. The study could for example: • map synergies, gaps or regulatory contradictions between the Baltic MAP and environmental frameworks/policies/strategies, • identify overlapping obligations that increase administrative burden on Member States, • recommend mechanisms to enhance coherence and synergies. Moreover, this study could also inform integration efforts in the **next Multiannual Financial Framework 2028–2034**[314]. The European Commission, in consultation with Member States, could be asked to clarify the Baltic MAP's role within the National and Regional Partnership Plans (NRPPs). This would help guide strategic allocation of EU and national resources to support interventions addressing both fishing and non-fishing pressures on Baltic fish stocks. **Involved actors:** European Parliament (PECH committee), European Commission, Baltic Sea Member States

[314] European Commission, Statement by the President: next long-term EU budget, 2025
European Commission, Questions and answers on the next long-term budget, 2025

3. Foster inter-regional learning across MAPs

Currently, there is no structured platform for stakeholders from the various EU regional MAPs to regularly exchange experiences and lessons learned.

Thus, the European Commission could be requested to **establish an EU-wide cooperation and dialogue platform** for sharing experiences between different regional MAPs. This platform might for example facilitate knowledge exchange on ecosystem modelling, TAC setting under uncertainty, stakeholder engagement and the integration of environmental targets.

Involved actors: European Commission, in coordination with MAP stakeholders at national, regional, and EU levels (including Baltic Sea Member States, advisory councils, scientific community and relevant stakeholder groups)

4. Ensure fishing opportunities and safeguards are timely and fair, especially for small-scale fisheries

As noted in this study, small-scale coastal fisheries (SSCF) are sometimes disproportionately affected by decisions under the Baltic MAP – such as safeguard measures – which do not sufficiently consider their specific needs. To address this, fishing opportunities and safeguards would need to be designed and implemented in ways that do not disproportionately harm small-scale fishers. This aligns with Article 2(5f) of the CFP Regulation[315], which stresses the contribution to a fair standard of living for those who dependent on fishing, with special consideration for coastal fisheries and related socio-economic aspects.

To address this, the European Commission could be tasked to launch a **targeted study on the socio-economic effects** of TAC changes and safeguard measures on SSCF and coastal communities across Baltic Member States.

The study could for example analyse potential future scenarios of fishing disruptions in Baltic Sea fisheries (e.g. status quo, significant quota reductions, or total bans for key species) using counterfactual methods and surveys with fishers. The results of the study should feed into a fisheries management framework that ensures targeted support and equitable quota allocation.

To enhance the effectiveness and widen stakeholder acceptance of future Baltic MAP implementing decisions, measures and amendments, the European Commission could be requested to establish **an SSCF consultation step in the design of any new Baltic MAP measures or proposals.** This could be formalised via a checklist or impact filter that screens proposals for their effects on SSCF, before being formally put forward by the European Commission.

Involved actors: European Parliament (PECH committee), European Commission, Council of the EU, Baltic Sea Member States (national fisheries authorities), Baltic Sea

[315] CFP Regulation (EU) No1380/2013, Article 2 (5f)

	Advisory Council, scientific advisory bodies (such as ICES), representatives of small-scale fisheries, and other relevant stakeholder groups (e.g. fisheries sector organisations, NGOs, and coastal community associations)
	**5. Enhance regionalisation and cooperation** The study concluded that while the Baltic MAP provides a legal framework for regional cooperation, its full potential is not being entirely explored. Therefore, consider encouraging Member States to **increase the use of joint recommendations** through regional cooperation bodies (e.g. BALTFISH). **Structured collaboration formats** between BALTFISH and BSAC, as well as between other regional actors like ICES and HELCOM, could also be convened to coordinate this process. Strengthened cooperation **with non-EU actors** such as Norway could also support more coherent shared-stock management (e.g. for Western Baltic herring). **Involved actors:** European Parliament (PECH committee), regional cooperation bodies, Baltic Sea Member States, supported by the European Commission
	**6. Strengthen the scientific basis and optimise data collection and monitoring** The study highlights several key concerns regarding the Baltic MAP's data collection and monitoring, such as misreporting, data gaps (e.g. from Russia and recreational fisheries) and insufficient funding. It also cites a lack of transparency, limited early engagement in the formulation of advice, and weak cooperation between scientists and fishers for better data collection. Additionally, implementing an ecosystem-based approach will further require more comprehensive and complex data, particularly on environmental and non-fishing pressures. To address these issues and provide robust scientific advice and monitoring data, the European Commission in coordination with ICES and Member States, could be tasked **with broadening and upgrading the scope of data collection** under the Data Collection Framework to better capture information on ecosystem health and non-fishing pressures. The prioritisation and allocation of EMFAF resources could further support these enhancements to data quality and scope. Moreover, the Parliamentcould recommend that the European Commission and Member States further **strengthen their monitoring and control systems.** This may include for example: • expanding the adoption of electronic systems, • targeting high-risk fleets that could present an elevated likelihood of non-compliance with regulations, and • introducing real-time reporting tools to minimise the risk of non-compliance and unintentional misreporting.

	These ongoing and future efforts, already supported by the EMFAF, could be reinforced and strategically prioritised. **Involved actors:** European Parliament (PECH committee), European Commission, Baltic Sea Member States (national fisheries and control agencies), ICES, and other actors such as the European Fisheries Control Agency (EFCA)
	**7. Ensure consistent application of the precautionary approach** The study stressed the inconsistent application of the precautionary approach when setting fishing opportunities, which contributes to the unsustainable exploitation of stocks. Strengthening the systematic and transparent implementation of precautionary measures is therefore essential for effective, science-based fisheries management. The Council of the EU and the European Commission could be be tasked with **establishing and clearly defining the systematic use of precautionary buffers** when setting TACs, ensuring that the process is transparent, consistent, and based on the best available science. To support this, the European Commission could also be encouraged to **develop detailed operational guidance,** in collaboration with ICES, on how precautionary buffers are derived, calculated and applied in TAC proposals. This guidance should be made publicly available, subject to regular review, and updated as new scientific knowledge and changing ecosystem conditions emerge. **Involved actors:** European Parliament (PECH committee), Council of the EU, European Commission, supported by ICES; and relevant stakeholder advisory bodies (e.g. fisheries advisory councils)
	**8. Align decisions on fishing opportunities with scientific advice and enhance transparency** Persistent discrepancies between scientific advice and decisions on fishing opportunities – despite the poor status of several stocks – undermine the effectiveness of the Baltic MAP and hinder progress toward sustainable fisheries management. To address such discrepancies, the Council of the EU could be formally reminded – via a **resolution**– to align Total Allowable Catches (TACs) decisions more strictly with ICES advice. The European Commission, supported by ICES, could also be asked to provide clearer and more accessible **guidance to ministers** of the Council of the EU by clarifying the basis of scientific advice and their proposals for TACs. Moreover, the Council of the EU, European Parliament and the European Commission could jointly commit to ensuring and promoting greater transparency in negotiations and decision-making processes, particularly where fishing quotas deviate from

	scientific advice. To support accountability, **annual reviews** detailing and justifying any deviations could be published and made easily accessible. **Involved actors:** European Parliament (PECH committee), Council of the EU, European Commission, supported by ICES and the broader scientific community
	**9. Improve socio-economic integration and stakeholder involvement in the Baltic MAP** Article 2(5f) of the CFP Regulation underlines the importance of contributing to "*a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects*"[316]. Effective and widely accepted fisheries management therefore requires a meaningful integration of socio-economic dimension and the active involvement of local and regional stakeholders – both essential for building trust and strengthening the adaptive capacity of coastal communities. Therefore, it is important for the MAP to systematically involve local actors in coastal regions, including municipal representatives, who play a vital role in coastal communities and tourism. The Parliamentcould recommend that the European Commission, Member States and regional bodies **formally and consistently embed stakeholder engagement mechanisms** throughout all stages of the Baltic MAP's advisory and decision-making processes, with a particular emphasis on local actors in coastal communities. These could include: • setting up and using formal and regular stakeholder advisory platforms for SSCF at regional levels (via BALTFISH and BSAC), ensuring early input from fishers, tourism stakeholders, local authorities, among others. • mandating inclusive consultation procedures for the development, review or amendment of MAP-related proposals, with a balanced representation of both SSCF and large-scale operators. • enhancing accountability and transparency by publishing consultation summaries and clearly documenting how stakeholder input has informed MAP decisions. **Involved actors:** European Parliament (PECH committee), European Commission, Baltic Sea Member States, regional cooperation bodies (BALTFISH, BSAC), Committee of the Regions, local authorities, SSCF and other actors in coastal regions
	**10. Increase awareness of the Baltic MAP and its objectives**

316 CFP Regulation (EU) No1380/2013, Article 2 (5f)

	Despite its years of operation, awareness of the Baltic MAP's objectives and the quota-setting process remains limited among some stakeholders, including national authorities and fishers. In this context, the Parliament could suggest that the European Commission, in cooperation with Member States and regional cooperation bodies (e.g. BALTFISH, BSAC), coordinate **targeted awareness and outreach activities** at national level. These activities would aim to enhance understanding of the Baltic MAP's objectives and role, clarify the connection between the MAP and broader EU marine and fisheries legislation (e.g. CFP, MSFD, Nature Restoration Law), and strengthen stakeholder literacy regarding regional policy tools and funding mechanisms. These activities could be guided by the comprehensive alignment study (see recommendation 2 above), ensuring that communication materials accurately reflect the full scope of EU and regional marine governance frameworks in an accessible and practical format for local actors. **Involved actors:** European Parliament (PECH committee), European Commission, regional cooperation bodies, Baltic Sea Member States

4.2.2. Revising the Baltic MAP

Regulatory framework and implementation aspects	
	**1. Broaden scope and integrate the ecosystem-based approach** The findings from this study indicate that the current Baltic MAP framework does not adequately account for non-fishing pressures, such as eutrophication, low oxygen levels, and predator-prey dynamics, among others. The European Commission could be requested to **initiate a revision of the MAP regulation**, expanding its mandate to move beyond regulating the current three commercial fish stocks and instead explicitly incorporating ecosystem-based objectives. This could consider spatial planning (e.g. determining where fishing can still take place in the future, and under what conditions) as well as non-fishing pressures. The expansion should also take into account the implications of other EU and international regulations, as well as foster a robust inter-institutional cooperation and discussion among EU institutions (European Parliament, Council of the EU, European Commission), regional cooperation bodies (BALTFISH, BSAC, HELCOM) and Member States, carefully considering their respective institutional competences and diverse interests. Input from the scientific community and other relevant sector actors would also be vital to ensure a more evidence-based approach and broader acceptance of any changes. **Involved actors:** Council of the EU, European Commission, European Parliament (PECH committee), Baltic Sea Member States, regional cooperation bodies, the

	scientific community, other relevant stakeholders (e.g. fisheries organisations, NGOs, coastal community representatives)
	**2. Operationalise holistic ecosystem-based management, considering all factors affecting fish stocks, not solely fishing** Although the Baltic MAP Regulation formally refers to an ecosystem-based management approach, it has not yet been effectively operationalised. This study highlights that successful implementation requires clear definitions, robust scientific modelling, and integrated monitoring systems. The European Commission and Member States, supported by ICES, could be asked to **pilot ecosystem-based models** for the Baltic MAP fish stocks that incorporate environmental drivers into the process of setting TACs. This approach would involve: • clearly defining the ecosystem-based management concept within the MAP, establishing its scope as a fisheries management tool operating within broader ecosystem constraints, while clarifying that the MAP is not designed to regulate environmental variables directly. • integrating species interactions and environmental indicators (such as predator impacts, eutrophication) into scientific advice by adopting ecosystem modelling, updating the Data Collection Framework accordingly and supporting pilot initiatives such as ICES-Feco[317]. • establishing response mechanisms under the MAP to trigger coordinated action across relevant policies (e.g. declining oxygen levels, critical conditions of the flora and fauna). For example, if oxygen levels drop below a critical threshold, the MAP could mandate a review of fishing opportunities or prompt emergency actions involving the European Commission, regional bodies, and ICES. • investing in advanced monitoring systems to track key ecosystem variables, including non-target species, habitats, and climate-related stressors, using EU funding and advanced technology. **Involved actors:** European Parliament (PECH committee), European Commission, ICES, Baltic Sea Member States, regional cooperation bodies (BALTFISH, BSAC, HELCOM), scientific community.
	**3. Increasing flexibility and adaptability of the MAP to respond swiftly to dynamic ecological changes and unforeseen developments** As highlighted in this study, the MAP's rigid framework hinders responsiveness to emerging ecological challenges and new scientific insights. The European Commission, in collaboration with regional cooperation bodies and Member States, could be tasked to design and implement **adaptive management**

[317] ICES, Baltic Fisheries Assessment Working Group (WGBFAS), Volume 5 | Issue 58 ICES Scientific Reports, 2023

	protocols for the Baltic MAP. These protocols would enable timely adjustments of TACs and other regulatory measures based on real-time environmental or stock data. These might include the establishment of a **dedicated crisis management** mechanism to address unexpected ecosystem changes and **a scientific task force –** potentially involving ICES, HELCOM and academic experts – to provide rapid, evidence-based advice and recommend immediate policy changes when critical marine ecosystem conditions are detected. To ensure that such adaptability does not undermine planning security for the fisheries sector, all adaptive measures should be complemented by clear assessment procedures that prioritise both transparency and predictability for stakeholders, particularly regarding investment and long-term stability. **Involved actors:** European Parliament (PECH committee), European Commission, Baltic Sea Member States, regional cooperation bodies, ICES and broader scientific community.
	**4. Refine MSY targets to reflect environmental uncertainty** Stakeholders widely express concern that MSY-based models and TAC settings fail to reflect the rapidly changing dynamics of the marine ecosystem. Therefore, to ensure that fisheries management remains robust in the face of environmental variability, it is essential to revisit and refine the application of Maximum Sustainable Yield (MSY) targets for the Baltic Sea. The Parliament could invite the European Commission to initiate an **independent scientific review of the MSY approach** under altered ecosystem conditions. This review could assess: • the potential benefits of shifting from full MSY to more conservative benchmarks (e.g. a proportion of MSY or more precautionary reference points) in enhancing stock resilience. • how MSY-based TACs could be applied over multi-year periods, including the use of built-in mechanisms for adjusting TACs in response to changing stock status and environmental conditions. • the feasibility of integrating environmental indicators (e.g. predator-prey balance, eutrophication, climate stressors) into MSY models and stock assessment for Baltic Sea fisheries. This builds on ICES scientific advice and initiatives to integrate environmental and ecosystem drivers into ecosystem modelling (e.g. ICES-Feco[318]), expanding the traditional

[318] ICES, Baltic Fisheries Assessment Working Group (WGBFAS), Volume 5 | Issue 58 ICES Scientific Reports, 2023

	fisheries focus of the MSY framework towards a more holistic, ecosystem-based fisheries management paradigm.[319] Moreover, **an independent scientific review** would reduce politically malleable interpretations of MSY – shown during the complex EU legislative negotiations and reinterpretations of scientific concepts of FMSY in the 2013 CFP reform – while enhancing the credibility of scientific advice and supporting a more adaptive, ecosystem-based approach to fisheries management in line with the CFP. **Involved actors:** European Parliament (PECH committee), European Commission, supported by ICES/broader scientific community; and, as appropriate, Baltic Sea Advisory Council (BSAC) and its stakeholder representatives.
	**5. Institutionalise regular Baltic MAP evaluations** Regular, evidence-based evaluations are essential for ensuring that the Baltic MAP and other multiannual plans remain effective and adaptive in the face of changing ecological, economic, and social conditions. The European Commission could be encouraged to launch **a regular five-year evaluation cycle** for the Baltic MAP, and by expansion, for all multiannual plans. This evaluation may include a more systematic approach to assessing the effectiveness, added value, efficiency, coherence and relevance of additional measures (e.g. using ICES assessments, fishers survey, monitoring data). **Involved actors:** European Parliament (PECH committee), European Commission

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Annexes

Annex 1: List of references

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Platforms and links (non-exhaustive)	– Publications available at: https://www.fi-compass.eu – Baltic Sea region strategy EUSBSR PA Nutri, PA Hazards, PA Ship – Baltic Waters "Deep Dive: Ecosystem-Based Fisheries Management – Utopia or Opportunity?", Baltic Waters 2024 – Council of the Baltic Sea States available at: https://cbss.org – Baltic Sea Advisory Council available at: www.bsac.dk – LIFE: https://lifeplatform.eu/ – Webgate
Monitoring and statistical data sources (non-exhaustive)	– ICES reports – STECF reports – HELCOM reports – EFCA Fisheries Information System – National statistical data

Annex 2: Interview partner organisations

MS	Organisation	Website	Type of organisation	Status of the interview
DE	Ministry of Agriculture, Rural Areas, Europe and Consumer Protection (Original name: Ministerium für Landwirtschaft, ländliche Räume, Europa und Verbraucherschutz (MLLEV)	https://www.schleswig-holstein.de/DE/landesregierung/ministerien-behoerden/IX	Policy implementation EMFAF MA	completed
DE	Thünen-Institut	https://www.thuenen.de/de/themenfelder/fischerei	Academia	completed
DE	German Fisheries Association (Original name: Deutscher Fischerei Verband (DFV)	https://www.deutscher-fischerei-verband.de/	Fisheries Association[322]	completed
DE	Verbraucherzentrale Bundesverband e.V. (VZBV)	https://www.vzbv.de/	Federation of German Consumer Organisations	As VZBV was not available, other consumer organisations across Germany were contacted (via e-mail and phone). None agreed to an interview due to their limited expertise on this topic or they did respond at all
DK	Technical University of Denmark (DTU), Aqua National Institute of Aquatic Resources	https://www.aqua.dtu.dk/english/	Academia	completed
DK	Danish Pelagic Producers Organisation (DPPO)[323]	https://www.dppo.dk/	Fishermen's union	completed
EE	Ministry of Regional Affairs and Agriculture Estonia	https://agri.ee/	Policy implementation EMFAF MA	completed

[322] The German Fisheries Association (Deutscher Fischerei Verband) includes four sectoral associations: Association of German Cutter and Coastal Fisheries, German Deep Sea Fisheries Association, Association of German Inland Fisheries, German Angling Association Source: Spartenverbände

[323] The Danish Agricultural and Fisheries Agency was originally planned to be interviewed. However, it has now been replaced by the Danish Fisheries Producer Organisation (DPPO).

MS	Organisation	Website	Type of organisation	Status of the interview
FI	Ministry of Agriculture and Forestry in Finland	https://mmm.fi/etusivu	Policy implementation EMFAF MA	completed
FI	Finnish association of professional fishermen (SAKL)	https://sakl.fi/	Fishermen's union	completed
LT	Ministry of Agriculture of the Republic of Lithuania	https://nma.lrv.lt/en/	Policy implementation EMFAF MA	completed
LV	National Paying Agency under the Ministry of Agriculture Latvia	https://www.zm.gov.lv/en	Policy implementation EMFAF MA	completed
LV	Institute of Food Safety, Animal Health and Environment "BIOR"	https://bior.lv/en	Regional coordination and data collection	completed
PL	National marine fisheries research institute Poland	https://mir.gdynia.pl/o-instytucie/?lang=en	Academic	completed
PL	Ministry for Agriculture and Rural Development	https://www.gov.pl/web/rolnictwo/	Policy implementation EMFAF MA	completed
PL	Low Impact Fishers of Europe (LIFE) (Interview was conducted with President of the Darłowo Fish Producers and Boat Owners' Organisation (member of LIFE Platform))	https://lifeplatform.eu/	Association	completed
SE	Stockholm University Baltic Sea Centre	Stockholm University Baltic Sea Centre	Academia	completed
SE	Coalition Clean Baltic	https://www.ccb.se/	NGO	completed
SE	Ministry of Enterprise and Innovation		Policy implementation EMFAF MA	Not conducted due to their busy schedule.
SE	Swedish Agency for Marine and Water Management	https://www.havochvatten.se/en	Regional coordination and data collection	Not conducted due to their busy schedule.
SE	Swedish Fishermen's Producer Organisation (SFPO)	https://www.sfpo.se/	Fishermen's union	completed

MS	Organisation	Website	Type of organisation	Status of the interview
SE	FishSec c/o Naturskyddsföreningen	https://www.fishsec.org/our-work-and-goal/	NGO	completed
SE	Swedish Consumers' Association (Sveriges Konsumenter)	https://www.sverigeskonsumenter.se/	Consumer organisation	Both organisations were contacted. However, neither was able to participate: Sveriges Konsumenter cited limited resources, and Konsument Europa indicated that the evaluation fell outside their scope of work.
SE	Konsument Europa	www.konsumenteuropa.se	Consumer organisation	
BS	HELCOM, Baltic Marine Environment Protection Commission (Helsinki Commission)	https://helcom.fi	Intergovernmental organisation	completed
BS	Regional Coordination Group (RCG) Baltic	https://www.fisheries-rcg.eu/rcg-baltic/	Regional coordination and data collection	Completed/addressed through the two interviews conducted for DK and LT. Upon contact, the RCG Secretariat suggested two interview partners – DTU Aqua (DK) and a Chair member of the RCG (from LT Ministry of Agriculture) – both of whom were affiliated with organisations we interviewed.
EU/ BS	WWF Baltic programme	https://www.wwfbaltic.org/	NGO	completed
EU	European Commission DG MARE, Unit C, Fisheries policy Atlantic, North Sea, Baltic & Outermost regions	https://oceans-and-fisheries.ec.europa.eu/index_en	European Commission	completed
EU	STECF (Scientific, Technical and Economic Committee for Fisheries)	https://stecf.ec.europa.eu/index_en	European Commission	STECF was used as a source for desk research, therefore no interview was conducted.

Source: M&E Factory 2025

List of interview questions

Item	Questions/topic	Public sector	National ICES representative or fisheries scientists	National fishers' associations	NGOs, civil society organisations	Consumer organisation[324]	Regional organisations	EU institutions
ROLE	1. Your role and organisation's involvement in the Baltic Sea fisheries management 2. How familiar are you with the Baltic MAP?	X	X	X	X	X	X	X
EFFECTIVENESS: MAIN ACHIEVEMENTS	3. What have been the key achievements of the Baltic MAP so far, particularly in terms of: a. Improving the sustainability of fisheries in the Baltic Sea? b. Achieving Good Environmental Status (GES)? c. Achieving Maximum Sustainable Yield (MSY) for fish stocks (cod, herring, sprat)? d. Applying an ecosystem-based approach (broader marine ecosystem like species interactions, environmental conditions, human pressures)?						X	X
	e. Eliminating discards? f. Implementing the landing obligation? g. Other achievements?	X	X					
	4. What have been the main challenges/ drawbacks in the MAP implementation? Why?	X	X				X	X
	5. How has your country used the MAP's safeguard mechanisms, especially in critical years? a. Type of safeguard measures applied b. Their effectiveness. Which ones have worked best? c. Use of scientific advice (e.g., ICES) d. Transparency and stakeholder involvement	X	X					

[324] No interview was conducted with a consumer organisation

Item	Questions/topic	Public sector	National ICES representative or fisheries scientists	National fishers' associations	NGOs, civil society organisations	Consumer organisation[324]	Regional organisations	EU institutions
	6. To what extent has the MAP been implemented at regional level? How effective has this been?						X	X
EFFECTIVENESS: IMPLEMENTATION PROCESS	7. How has the MAP been implemented in your country? a. Programmes contributing to the MAP b. Technical measures implemented (e.g. adoption of selective fishing practices, measures contributing to changes in fishing gear and techniques to reduce bycatch, etc.) c. Resources (budgets, personnel) d. Any conflicting national policies e. Role of stakeholders	X	X					
	8. What mandatory data collection systems are implemented in your country to monitor fish stocks and fishing activities under the MAP? If so, how are these used?	X	X					
	9. How well have the MAP objectives been integrated into national decision-making processes? a. Are stakeholders aware of and engaged with these objectives? b. To what extent have the MAP objectives influenced fisheries policy decisions? c. How effective is stakeholder involvement in decision-making?	X	X	X	X	X		
EFFICIENCY	10. Have you experienced specific challenges in implementing the MAP?	X	X					
	11. How has your country applied the flexibility mechanisms provided in the MAP (e.g., Art 15,9 of CFP like Flexibility in Quota Management, Inter-Species Flexibility c)	X	X					

Item	Questions/topic	Public sector	National ICES representative or fisheries scientists	National fishers' associations	NGOs, civil society organisations	Consumer organisation[324]	Regional organisations	EU institutions
	Inter-Annual Flexibility)? How has this affected the total landings over time?							
	12. What kinds of additional activities have been introduced or adjusted because of the MAP (e.g. stakeholder consultations, reporting, coordination mechanisms, etc.)?	X	X					
	13. How efficient has the MAP implementation process been in terms of: a. Time-cost-effectiveness of implementing measures. b. Financial, human resources allocated c. Streamlining processes and minimising bureaucracy/workload? d. Monitoring system e. Any good practices?	X	X					
	14. How effective is coordination and communication under the MAP at: a. national level (among institutions, stakeholders), and with other national measures (e.g., closures, effort control)? b. regional level (with other Baltic MS)? c. EU level (Council, Commission) on MAP decisions?	X	X	X	X	X	X	X
COHERENCE	15. To what extent is the MAP aligned with: a. National fisheries legislation, policies? b. Regionalisation efforts within the Baltic region? c. EMFAF programmes and funding mechanisms?	X	X					
	16. Are there mechanisms to ensure the MAP remains coherent with evolving national priorities and environmental directives?	X	X	X	X	X	X	

Item	Questions/topic	Public sector	National ICES representative or fisheries scientists	National fishers' associations	NGOs, civil society organisations	Consumer organisation[324]	Regional organisations	EU institutions
	17. Have you experienced any synergies or conflicts between the MAP and other policy areas (e.g., environmental protection, maritime spatial planning)?	X	X	X	X	X	X	X
RELEVANCE	18. Are the MAP objectives still relevant? Should the MAP be revised, updated?	X	X	X	X	X	X	X
	19. How well has the MAP adapted to a changing environment (e.g., climate change, eutrophication)?	X	X				X	X
	20. How flexible and relevant is the MAP ecosystem-based approach in addressing new challenges?	X	X	X	X	X	X	X
	21. Can you give any examples where the MAP has been adjusted in response to new environmental or scientific data?	X	X	X	X	X	X	X
EU ADDED VALUE	22. In your opinion, what added value has the MAP brought as part of the Common Fisheries Policy? a. Has it improved the sustainability of fisheries management? b. Has it strengthened regional cooperation or harmonised regulations? c. What unique benefits has it delivered for the Baltic Sea region?	X	X	X	X	X	X	X
	23. How important has EU financial support been for implementing the MAP, compared to national resources?	X	X	X	X	X	X	X
	24. Do you believe the objectives of the MAP would have been achieved without an EU framework (e.g. if yes, do you think the timeline would have been longer or the quality	X	X	X	X	X	X	X

Item	Questions/topic	Public sector	National ICES representative or fisheries scientists	National fishers' associations	NGOs, civil society organisations	Consumer organisation[324]	Regional organisations	EU institutions
	of implementation lower without EU coordination and support?)							
FINAL REMARKS	25. What improvements/changes would you recommend for any future revision of the MAP? 26. Any lessons learnt from your experience with the MAP that could be applied in other regions or policies?	X	X	X	X	X	X	X

Annex 3: Statistical data and maps

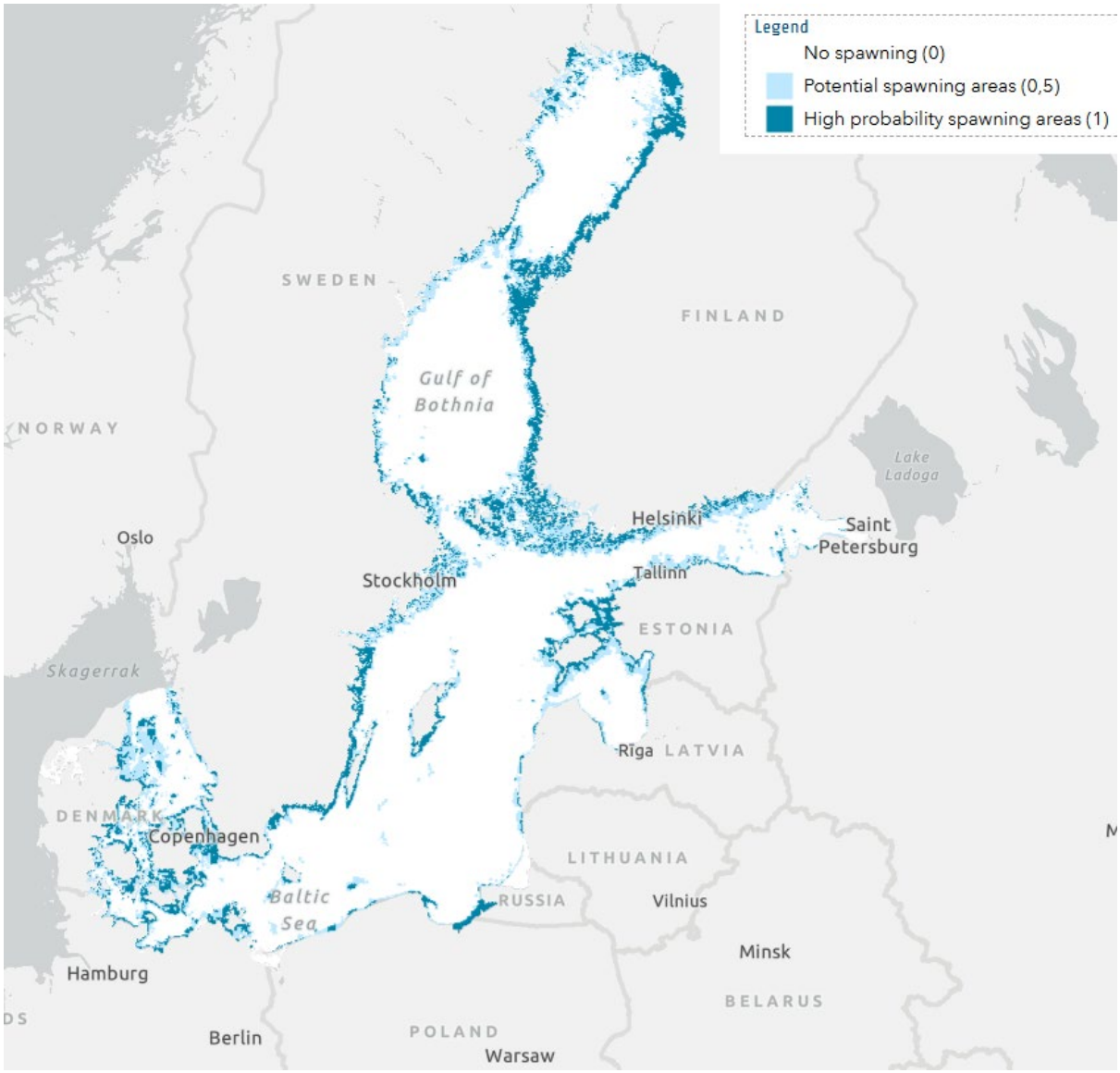
The maps show potential spawning[325] areas of cod, sprat and herring.

Figure A.1 – Potential spawning areas for cod PBS EFH

Source: HELCOM Map and data service
https://maps.helcom.fi/website/mapservice/?datasetID=4e9d17c7-85a6-467b-9593-b9c0947b0097

[325] "Potential spawning areas" of cod, sprat and herring in the Baltic Sea refer to marine regions where environmental conditions are suitable for these fish to reproduce (spawn) – even if spawning has not been directly observed in every such area.

Figure A.2 – Potential spawning areas for herring PBS EFH



Source: HELCOM Map and data service
https://maps.helcom.fi/website/mapservice/?datasetID=4e9d17c7-85a6-467b-9593-b9c0947b0097

Figure A.3 – Potential spawning areas for sprat PBS EFH

Source: HELCOM Map and data service
https://maps.helcom.fi/website/mapservice/?datasetID=bae53d8e-a5a2-4d01-b260-54d72ad46813

Table A.1 – Fleet capacity, fishing effort, employment and profitability in Baltic by MS (STECF 18-07 and STECF 23-07)

Number of vessels		2016	2021	%
SSCF	DE	773	158	-79.56
SSCF	DK	453	361	-20.31
SSCF	EE	1 517	1 276	-15.89
SSCF	FI	1 530	1 186	-22.48
SSCF	LT	66	56	-15.15
SSCF	LV	206	210	1.94
SSCF	PL	617	650	5.35
SSCF	SE	462	331	-28.35
LSF	DE	45	27	-40.00
LSF	DK	58	22	-62.07
LSF	EE	31	28	-9.68
LSF	FI	63	41	-34.92
LSF	LT	23	13	-43.48
LSF	LV	59	38	-35.59
LSF	PL	192	155	-19.27
LSF	SE	71	44	-38.03
Total	DE	818	185	-77.38
Total	DK	511	383	-25.05
Total	EE	1 548	1 304	-15.76
Total	FI	1 593	1 227	-22.98
Total	LT	89	69	-22.47
Total	LV	265	248	-6.42
Total	PL	809	805	-0.49
Total	SE	533	375	-29.64
Total		**6 166**	**4 596**	**-25.46**

GT		2016	2021	%
SSCF	DE	2 148	592	-72.44
SSCF	DK	1 783	1 347	-24.45
SSCF	EE	2 215	1 521	-31.33
SSCF	FI	3 439	2 757	-19.83
SSCF	LT	306	165	-46.08
SSCF	LV	492	482	-2.03
SSCF	PL	2 700	2 911	7.81

GT		2016	2021	%
SSCF	SE	1 909	956	-49.92
LSF	DE	1 949	4 259	118.52
LSF	DK	4 004	3 324	-16.98
LSF	EE	3 509	4 047	15.33
LSF	FI	9 359	7 577	-19.04
LSF	LT	3 684	2 839	-22.94
LSF	LV	6 801	4 487	-34.02
LSF	PL	13 352	12 406	-7.09
LSF	SE	9 503	5 826	-38.69
Total	DE	4 097	4 851	18.40
Total	DK	5 787	4 671	-19.28
Total	EE	5 724	5 568	-2.73
Total	FI	12 798	10 334	-19.25
Total	LT	3 990	3 004	-24.71
Total	LV	7 293	4 969	-31.87
Total	PL	16 052	15 317	-4.58
Total	SE	11 412	6 782	-40.57
Total		**67 153**	**55 496**	**-17.36**

Total jobs		2016	2021	%
SSCF	DE	738	171	-76.83
SSCF	DK	152	104	-31.58
SSCF	EE	1 952	1 046	-46.41
SSCF	FI	1 369	1 002	-26.81
SSCF	LT	149	119	-20.13
SSCF	LV	256	338	32.03
SSCF	PL	1 394	1 404	0.72
SSCF	SE	552	462	-16.30
LSF	DE	58	56	-3.45
LSF	DK	114	50	-56.14
LSF	EE	155	117	-24.52
LSF	FI	155	102	-34.19
LSF	LT	186	72	-61.29
LSF	LV	391	248	-36.57
LSF	PL	862	765	-11.25
LSF	SE	205	154	-24.88

Total jobs		2016	2021	%
Total	DE	796	227	-71.48
Total	DK	266	154	-42.11
Total	EE	2 107	1 163	-44.80
Total	FI	1 524	1 104	-27.56
Total	LT	335	191	-42.99
Total	LV	647	586	-9.43
Total	PL	2 256	2169	-3.86
Total	SE	757	616	-18.63
Total		**8 688**	**6 210**	**-28.52**

FTE		2016	2021	%
SSCF	DE	566	88	-84.45
SSCF	DK	113	63	-44.25
SSCF	EE	335	176	-47.46
SSCF	FI	176	110	-37.50
SSCF	LT	42	38	-9.52
SSCF	LV	106	143	34.91
SSCF	PL	1 208	1 288	6.62
SSCF	SE	188	138	-26.60
LSF	DE	46	36	-21.74
LSF	DK	136	40	-70.59
LSF	EE	122	90	-26.23
LSF	FI	124	83	-33.06
LSF	LT	127	46	-63.78
LSF	LV	212	124	-41.51
LSF	PL	843	747	-11.39
LSF	SE	177	92	-48.02
Total	DE	612	124	-79.74
Total	DK	249	103	-58.63
Total	EE	457	266	-41.79
Total	FI	300	193	-35.67
Total	LT	169	84	-50.30
Total	LV	318	267	-16.04
Total	PL	2 051	2 035	-0.78
Total	SE	365	230	-36.99
Total		**4 521**	**3 302**	**-26.96**

Days at sea		2016	2021	%
SSCF	DE	64 649	50 703	-21.57
SSCF	DK	18 626	12 565	-32.54
SSCF	EE	68 849	53 948	-21.64
SSCF	FI	102 583	58 073	-43.39
SSCF	LT	4 179	4 007	-4.12
SSCF	LV	10 830	9 073	-16.22
SSCF	PL	52 757	50 274	-4.71
SSCF	SE	29 939	22 311	-25.48
LSF	DE	4 358	1 993	-54.27
LSF	DK	7 301	2 908	-60.17
LSF	EE	3 115	2 396	-23.08
LSF	FI	7 798	4 252	-45.47
LSF	LT	2 162	1 013	-53.15
LSF	LV	7 277	4 406	-39.45
LSF	PL	21 537	11 798	-45.22
LSF	SE	8 539	2 590	-69.67
Total	DE	69 007	52 696	-23.64
Total	DK	25 927	15 473	-40.32
Total	EE	71 964	56 344	-21.71
Total	FI	110 381	62 325	-43.54
Total	LT	6 341	5 020	-20.83
Total	LV	18 107	13 479	-25.56
Total	PL	74 294	62 072	-16.45
Total	SE	38 478	24 901	-35.29
Total		**414 499**	**292 310**	**-29.48**

GVA, € million		2016	2021	%
SSCF	DE	4.316	0.592	-86.28
SSCF	DK	2.811	2.204	-21.60
SSCF	EE	3.487	3.677	5.45
SSCF	FI	4.970	5.461	9.88
SSCF	LT	0.403	0.298	-26.09
SSCF	LV	0.983	1.380	40.35
SSCF	PL	7.851	4.373	-44.30
SSCF	SE	1.844	2.870	55.65

GVA, € million		2016	2021	%
LSF	DE	2.525	-2.330	-192.28
LSF	DK	11.622	5.262	-54.73
LSF	EE	6.543	5.685	-13.12
LSF	FI	12.336	15.050	22.00
LSF	LT	2.342	1.315	-43.87
LSF	LV	6.190	8.877	43.40
LSF	PL	23.274	14.927	-35.87
LSF	SE	27.547	18.498	-32.85
Total	DE	6.84	-1.74	-125.40
Total	DK	14.43	7.47	-48.27
Total	EE	10.03	9.36	-6.66
Total	FI	17.31	20.51	18.52
Total	LT	2.75	1.61	-41.26
Total	LV	7.17	10.26	42.98
Total	PL	31.13	19.30	-37.99
Total	SE	29.39	21.37	-27.30
Total		**119.05**	**88.14**	**-25.96**

Gross profit, € million		2016	2021	%
SSCF	DE	1.648	-1.648	-199.99
SSCF	DK	-3.426	-2.463	-28.12
SSCF	EE	1.486	1.473	-0.88
SSCF	FI	3.243	3.060	-5.66
SSCF	LT	0.051	0.046	-10.61
SSCF	LV	0.759	1.282	68.95
SSCF	PL	1.552	-4.019	-358.93
SSCF	SE	-3.940	-1.458	-63.00
LSF	DE	0.438	-4.116	-1039.75
LSF	DK	3.860	1.597	-58.62
LSF	EE	3.144	3.040	-3.31
LSF	FI	7.666	8.610	12.31
LSF	LT	0.905	0.251	-72.30
LSF	LV	3.439	4.350	26.49
LSF	PL	15.008	5.643	-62.40
LSF	SE	20.334	13.804	-32.11
Total	DE	2.09	-5.76	-376.32

Gross profit, € million		2016	2021	%
Total	DK	0.43	-0.87	-299.39
Total	EE	4.63	4.51	-2.53
Total	FI	10.91	11.67	6.97
Total	LT	0.96	0.30	-69.01
Total	LV	4.20	5.63	34.16
Total	PL	16.56	1.62	-90.19
Total	SE	16.39	12.35	-24.69
Total		**56.17**	**29.45**	**-47.57**

Source: M&E factory based on data from STECF 18-07 and STECF 23-07

Table A.2 – Member State fishing activity and fleet operating in the Baltic Sea, 2021 – split by fleet scale – small-scale coastal fleet (SSCF) and large-scale fleet (LSF)

Scale	MS	Baltic Sea (BS)		Total		Total in EU 27 area, excl. long distance fleet- LDF	% in Baltic Sea (BS)		
		Number of vessels (A)	Value (€ million) (B)	Number of vessels (C)	Value (€ million) (D)	Value (€ million) (E)	Number of vessels (F=A/C)	Value (%) (G=B/D)	Value in EU 27: Share of BS landings within EU 27 (used only in LSF) (H=B/E)
SSCF	**DE**	158	4.45	665	5.52	5.52	23.8 %	80.7 %	*long-distance fleet not relevant for SSCF*
SSCF	**DK**	361	6.40	850	21.28	21.28	42.5 %	30.1 %	*long-distance fleet not relevant for SSCF*
SSCF	**EE**	1,276	6.17	1,276	6.17	6.17	100.0 %	100.0 %	*long-distance fleet not relevant for SSCF*
SSCF	**FI**	1,186	8.26	1,189	9.01	9.01	99.7 %	91.6 %	*long-distance fleet not relevant for SSCF*
SSCF	**LT**	55	0.56	55	0.56	0.56	100.0 %	100.0 %	*long-distance fleet not relevant for SSCF*
SSCF	**LV**	210	1.51	210	1.51	1.51	100.0 %	100.0 %	*long-distance fleet not relevant for SSCF*
SSCF	**PL**	650	7.70	656	8.11	8.11	99.1 %	95.0 %	*long-distance fleet not relevant for SSCF*
SSCF	**SE**	331	5.18	660	19.86	19.86	50.2 %	26.1 %	*long-distance fleet not relevant for SSCF*
LSF	**DE**	27	4.88	232	160.80	144.00	11.6 %	3.0 %	3.4 %
LSF	**DK**	22	10.05	335	346.32	334.06	6.6 %	2.9 %	3.0 %
LSF	**EE**	28	7.77	34	8.12	8.12	82.4 %	95.7 %	95.7 %
LSF	**FI**	38	19.59	38	19.59	19.59	100.0 %	100.0 %	100.0 %

Scale	MS	Baltic Sea (BS)		Total		Total in EU 27 area, excl. long distance fleet- LDF	% in Baltic Sea (BS)		
		Number of vessels (A)	Value (€ million) (B)	Number of vessels (C)	Value (€ million) (D)	Value (€ million) (E)	Number of vessels (F=A/C)	Value (%) (G=B/D)	Value in EU 27: Share of BS landings within EU 27 (used only in LSF) (H=B/E)
LSF	**LT**	13	3.68	20	84.33	29.73	65.0 %	4.4 %	12.4 %
LSF	**LV**	38	15.60	38	15.60	15.60	100.0 %	100.0 %	100.0 %
LSF	**PL**	153	27.72	153	27.72	27.72	100.0 %	100.0 %	100.0 %
LSF	**SE**	44	29.36	131	97.70	97.70	33.6 %	30.1 %	30.1 %

Source: The 2023 Annual Economic Report on the EU Fishing Fleet (STECF 23-07), ANNEX

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This European implementation assessment of Regulation (EU) 2016/1139 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks aims to inform the ongoing work of the European Parliament's committee on Fisheries (PECH) on an own-initiative implementation report, 'The multiannual plan for the Baltic Sea and ways forward' (2024/2127(INI)).

This European implementation assessment is composed of two parts. First, an introduction by the EPRS provides essential historical and institutional background to the Baltic Sea multiannual plan and sets out the scope and the limitations of the attached evaluation study for clarity on the weight and bearing of the findings and recommendations.

Second, an evaluation study undertaken by a team of external experts that covers all Member States concerned over the 2016 to 2025 period. Based on interviews and desk research, it provides up-to-date and original sources on the status of the regulation's implementation over the past decade, allowing an evidence-based assessment of the effectiveness, efficiency, relevance, coherence and EU added value of the Baltic Sea multiannual plan. It also offers recommendations for making the current system work better and for possible legal revisions.

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