



EUROPEAN COMMISSION

Directorate-General for Maritime Affairs and Fisheries

Mr Virginijus Sinkevičius

Ms Charlina Vitcheva

cab-sinkevicius-contact@ec.europa.eu

Subject: Circumvention of the landing obligation
to deregulate the EU Basic Regulation (CFP)

Dear Mr *Virginijus Sinkevičius*
Ms *Charlina Vitcheva*,

We would like to inform you that an attempt is under way to circumvent the landing obligation laid down in the Article 15 of the EU Basic Fisheries Regulation, which is well ethically justified. The attempt is said to be a continuation of the Commission's exemption 2018/211.

We, the holders of fishing rights and fisheries in the River Torne in Finland and Sweden, were not aware of this Commission decision. The attempt concerns the selecting in the *PushUp* trap of wild salmon of the River Torne and other rivers of the Bothnian Bay which contrary to the acceptable cause, causes damage to and killing of wild salmon beyond the EU salmon quota.

The motivation for selecting salmon and avoiding the landing obligation is due to the structure of the salmon fishery, where **salmon are caught in pieces but sold in kilograms.**

Combined with a limited portion of the quota, allowing discards puts pressure on selection on a kilogram basis; the big ones are taken, the small ones are released. In this case, **the best female fish of wild salmon are lost.**

Officials in the interests of sea fishing have a clear attempt to increase coastal fishing of salmon and base salmon fishing on selection. All reared fish should be requested away. Only wild salmon would be counted in the quota and the remaining wild salmon would be released.

According to all the latest studies, such a fishing pattern leads to high mortality of wild salmon, especially during salmon spawning in fresh-water. It has come to our attention that the attempt has been promoted in Baltfish organization. However, we do not have the opportunity to know how Baltfish has handled this. STECF has also addressed the issue.

Evaluation of studies in support of selective salmon fishing

1. The survival of released salmon has been assessed in Finland in 2002 and 2006 (Siira et al.). It assessed the immediate mortality of salmon during the sea stage of the spawning season. Mortality was estimated to be 4-21%. Mortality from river migration was not determined.
2. A two-year study (SLU.aqua.2020.5.5-2) was conducted in Sweden, in which Finnish researchers also participated. The mortality of salmon tagged and monitored by telemetry has been as high as 47-88 % in these studies.

The study report highlighted (Page 14) the lack of studies on the effects of releases on salmon survival over a longer time period. Other negative effects such as behavioral disorders and spawn failure were also not evaluated. The conditions during the study period were warm but corresponded to the realism of everyday fishing in the sea.

3. A recent recent study in Finland (LUKE 18/2021) clearly reveals a fish-eries policy goal aimed at wide selection. According to the research plan, an exemption from the discard ban would allow a fishing model in which salmon is selectively fished with *PushUp* trap.

The study was conducted under conditions favorable to release! The water temperature was only 10-15 degrees. The salmon were caught into a water basin in fishing boats, which differ from the everyday reality of *PushUp* trap fishing.

The data covered in the study, with only 71 tag returns, is extremely limited. According to the study, 49 % of tag returns were received within 14 days of fish release. In contrast, the reported mortality rates (19-26 %) are remarkably high.

Mortality at sea was lower than average, but significantly higher in the river. The real effects of salmon selection at sea are only visible in the river. River mortality is significant for the assessment of mortality.

According to the study, 46 % of river fishing tag returns were obtained in downstream net and scoop-net fishing. It should be noted that more than half of the tagged salmon could not arrive the net and scoop-net fishing which accounted for 24% of the total river catch in 2020 and ended in week 27, (LUKE/SLU 2020).

Therefore, the share of tag returns for net and scoop-net fishing should have been max. 12 %. The result of 46 % shows that only 1/4 of the tagged salmon survived into the sport fishing areas upstream. It is clear that the number of survivors of the spawn was even lower.

The study (18/2021), like telemetry studies (2), shows that the actual mortality of wild salmon released from *PushUp* traps in commercial fisheries is at least 75 %! It remained unclear how many of the salmon survived the spawn.

To sum up, three studies in recent years have shown that wild salmon cannot withstand catch and release fishing with *PushUp* trap. Most of the salmon released die before spawning. River mortality of salmon in the River Torne has been observed since Sweden in 2014 set a separate quota for wild salmon and started selecting salmon.

According to the Finnish Food Authority, sick and dead salmon in River Torne have mechanical injuries.

We cannot accept that the largest and most respected animal in our rivers is being treated as biomass in marine areas and being harmed in a

targeted and intentional manner. Such is not necessary to reason and justice. Wild salmon must be given its own value as an animal in accordance with international obligations (FAO, RIO, UNCLOS).

Request

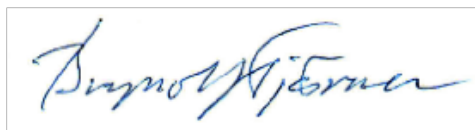
Based on the results of studies, we believe that the EU Commission should defend the ethical cornerstone of the Common Fisheries Policy (CFP) in order to ensure the implementation of the landing obligation in Article 15 and **deny the efforts of Finland and Sweden to pursue ethically unsustainable selection.**

Pello the 29th of march 2021

Sincerely Yours,



Kalervo Aska
Chairman in Finland



Brynolf Tjärner
Chairman in Sweden

Tornio-Muonio River Association

www.jokiseura.fi, kalervo.aska@hotmail.com

Tornio-Muonio River Association is working in Lapland on both sides of Torne river and Muonio river in Finland and in Sweden. We have been working over 35 years in favor of our people and our salmon. We say our salmon because salmon has been a most important nature resource for us as long as Lapland has been inhabited.

Background information on the provincial fish of Lapland,
the salmon and its fisheries

Wild salmon of Bothnian Bay are anadromous, they hatch and spend their first years in their home rivers, migrate to the Baltic Sea, then return to spawning their home rivers. Of the various wild salmon stocks, the most numerous is in the River Torne born wild salmon.

Historically, salmon have been caught in river fisheries. Salmon fishing made it possible to live on the banks of the River Torne and other rivers in the Lapland for a thousand of years. A salmon peasant culture evolved around salmon fishing. Salmon fishing was the most important part of the local peasant property. Salmon was the main source of income for the salmon peasant culture back in the 20th century.

With the development of technology, salmon fishing was transferred to the sea in the 20th century. **In this manner big mistake was made.** It was no longer possible to know which wild salmon stock was being fished. There was no motive to restrict salmon fishing because other than own resources were fished.

Extremely hard fishing was also justified by the fact that the target was reared salmon. At that rate, even the strongest salmon stock in Europe, the salmon of the River Torne, which is vital to us, was fished to the brink of extinction. Between 1978 and 2002, nine million salmon juvenies were planted in the river. This further increased the sea catch.

TACs and quotas based on the unknown origin of salmon were established from 1993 onwards on the basis of undeserved privilege and catches from those years of exploitation. Without an acceptable legal basis the millennial salmon fishing of the inhabitants of the river valleys was transferred to the inhabitants of the Baltic coast. (UNCLOS, Art. 66).

The River Torne salmon stock only recovered when sea catches was restricted from 1996 onwards. Before that, the old salmon fishing and salmon fishing culture on the River Torne had been destroyed.

The fact that salmon fishing is the sempiternal ownership and identity of the homesteads in river valleys of Bothnian Bay is not taken into account when regulating salmon fishing at sea. Salmon fisheries was even used as collateral for loans, which explains its importance to local people.

TACs and quotas of salmon in the Baltic Sea are decided without listening to the holders of fishing rights and fisheries in the salmon rivers representing the ancient salmon fishing culture. In connection with this problem, the Finnish Parliament wanted a change in the status of salmon as a marine fish in 2012 (Article 5) when it spoke (MmVLvp 11/2012) on the Union's basic regulation (CFP).

The proposal did not enjoy the support of fisheries management officials and thus did not receive the attention it deserved in the European Union. Ignoring Finland's position does not eliminate the fact that the European Union must also respect the rights and needs of people living in peripheral areas, as guaranteed by the EU Charter of Fundamental Rights.