

Tornio-Muoniojokiseura ry

Pello 7.4.2021

Finland and Sweden

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

On March 29, 2021, we appealed to you about the obligation to land salmon. We are now supplementing our petition to show that the proposed regulation would be clearly contrary to EU law.

In addition, we ask you to be informed that the situation is visible in our region and is much worse than the Finnish and Swedish states are able to see from the sea.

The problem means only percentages for administrators, thousands of salmon dying for us. Attached are pictures of damaged salmon. The selection of salmon is completely irresponsible and unnecessary waste of natural resources.

There is a lot of suffering associated with those images. A large part of the salmon in those pictures have been alive when brought on the riverbank in that condition. It is perhaps descriptive that these fish have been called zombie salmon when they swim absurdly and slowly along surface

waters. Last years it has been general to see dead and zombie salmon on the riversides of hundreds of kilometers length of the River Torne.

No one should have the right to use any living being with this immorality and brutality.

Therefore, it would be a scandal if any exemption of landing obligation will be allowed by EU Comission for Finland and Sweden. Salmon selection, according to studies, results in the death of most.

We would like to inform you what Atso Romakkaniemi, the leading specialist researcher in the Baltic Sea region, wrote (the newspaper Lapin Kansa) on 26 August 2020:

"Studies on salmon health problems and migratory behavior are underway in the River Torne. The results of the study have not yet been published, but their message so far seems clear: in the current situation, salmon in both Bothnian Bay and the river are sensitive to the stress of visiting the trap, causing most of them not to migrate to their spawning grounds but stay / return to the sea or stay downstream. This is especially true for salmon caught in early summer.

Most salmon are processed and released in the northern Bothnian Bay. Salmon is released, especially in the Swedish side of Bothnian Bay, where the salmon quota is only enough for 2-3 weeks, but the traps are caught before the permitted opening date for salmon fishing and are kept in the fishery when the quota is exhausted."

We ask the EU Commission to take legal action under The Treaty of Lisbon Article 2 B 1d: "The Union shall have exclusive competence in the conservation of marine biological resources under the common fisheries policy".

We demand EU to stop the regulation that is being prepared.

We refer to article 2. (5a) of the Basic regulation "taking into account the best available scientific advice", and "by gradually ensuring that catches are landed".

We refer to article 3.(a,b,c) "taking into account of regional specificities, through a regionalised approach and in accordance with the best available scientific advice".

Our position as the owner of the salmon fishing rights

According to a Finnish-Swedish study (River Torne, Dnr SVA 2017/59 Dnr Evira/2489/0165/2016), sick and dead salmon had mechanical damage as a result of release from the gear.

Unlike the Fisheries Authority, the Food Agency, former EVIRA, takes us into account as a stakeholder. On 4.2.2021, it sent an application for a permit (Dnro 828/05.20.10/2021) to the owners of the fishing rights in River Torne to catch sick fish from the river for research.

As a maritime organization, Baltfish has disregarded the regionalized and local approach provided for in the basic regulation and information examined regarding the selection of salmon. **The salmon mortality in the river, which is the most significant, has not been taken into account and we, the owners of the fishing rights, have not been consulted.**

We ask for your response that you have been informed of our serious appeal, and we ask for your response on what action you intend to take.

Pello the 7th of April 2021

Sincerely Yours,

Kalervo Aska

Chairman in Finland

Brynolf Tjärner

Chairman in Sweden

Tornio-Muonio River Association

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Tornio-Muonio River Association is working in Lapland on both sides of the river Torne and river Muonio 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 the most important nature resource for us as long as Lapland has been inhabited