

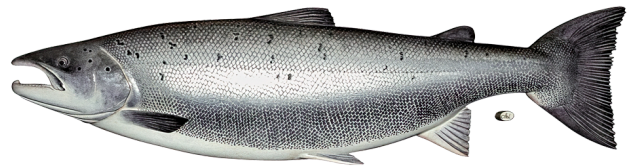


EUROPEAN COMMISSION

European Commissioner for Maritime Affairs and Fisheries

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EVERY DECISION MAKER SHOULD NOW BE VERY CONCERNED ABOUT SALMON but also about the European Union's fisheries policy and its legality

1. Salmon stocks have collapsed again.

The salmon stock in the Tornio River has again declined rapidly since 2022 and has been below the MSY level required by Law 1380/2013 in 2023 and 2024. **According to ICES, it is obvious that the situation will not improve in 2025.** According to ICES advice of 28 May 2025, the number of salmon will continue to decline, by up to 13 % between 2025 and 2026. How can ICES propose a quota that will further weaken the salmon stock? **Setting a salmon quota for 2026 is in direct contravention of EU law 1380/2013. It is unacceptable to kill salmon to extinction.**

2. Mixed fisheries at sea have destroyed many salmon stocks.

At the end of the 20th century, salmon fishing shifted to sea fishing, as if it were a pelagic fishery. The Baltic coastal states fished the arctic river resource very intensively in mixed stocks at sea. There was no interest in salmon conservation. Many salmon stocks have been completely lost. The salmon in the River Tornio is the largest and most important in the EU. Its extinction was prevented by extensive fish farming. The real recovery came when significant restrictions on sea fishing were introduced in 1996 and 2012.

3. The salmon management plan is about exploiting the Arctic resource in the South.

Management plans have been drawn up for marine fish stocks. It is not possible to have a single management plan for marine fisheries for the different salmon stocks that takes into account the status of the different salmon stocks. This is about **the exploitation of an Arctic resource in the South. Salmon stocks cannot be managed as a shared resource.** There is no biological basis for salmon fishing at sea.

ICES stated on 28.5.2025: *"Ideally, management of Atlantic salmon fisheries should be based on the status of individual wild river stocks."* ICES recognises the realities, but ICES advice is not based on biological sustainability alone, but also on a trade-off between fisheries. ICES is part of the political fisheries system. ICES does not take a position on the fairness or economic productivity of salmon fisheries.

4. Legal and social grounds. Who is the real stakeholder?

Salmon fishing has been a local culture since time immemorial. Salmon have been the main asset and source of income for local people here for over 500 years. It was in the fishermen's interest to ensure the viability of each stock. 97% of the salmon caught in the Baltic Sea marine fisheries in recent decades has come from the Finnish and Swedish Lapland region.

Today the economic value of salmon fishing in marine fisheries is very small. The cost of management alone is likely to be more than the value of the fishery. In 2017, the University of Helsinki calculated **the value of the salmon fishery in the Tornion River at € 10.8 million**, with a value of € 1.320 per salmon. Salmon river fishing is at least 10 times more profitable than sea fishing. The problem for the state is that revenues are diverted to the Arctic.

5. The salmon cannot be managed as a shared common resource.

The salmon in the Tornion River is a natural resource in the Arctic river basin, whose welfare and exploitation have been taken away from the local people by the Finnish authorities and EU. **Salmon are born in the river** and live most of their lives in the river. Salmon feed in the sea and return to their home river to spawn. **The salmon is an anadromous fish.** Salmon are regulated by the United Nations Convention on the Law of the Sea. (UNCLOS Art.66)

According to Art.10/c of the RIO Convention on Biological Diversity, the traditional and sustainable use of biological resources shall be protected. There is a clear biological, social, legal and economic basis for river fishing. The European Union is destroying the salmon stocks and depriving the inhabitants of their ancient livelihood and property by allocating Arctic salmon to the Baltic Sea for fishing on the principle of relative stability. The relative stability copied from the marine species fishery is not based at all on the historical stability of the fishery. **The unjustified status of salmon as a marine fish should be removed from the basic fisheries regulation 1380/2013.**

The EC must ask itself whether it is right to ask ICES for advice on salmon fishing as a marine fishery with quotas. **Can salmon sea fishing be given preferential treatment over the age-old river fishery?** This question needs to be considered from a biological, ownership, legal, social and economic perspective. **River fishing has been excluded from strategic consideration.** Today, the share of river fisheries is derived from what remains of marine fisheries. **Salmon stocks cannot be managed as a shared common resource.**

The River Tornio - Arctic river is very different compared to southern rivers.

Today, only a few salmon rivers in EU meet the requirements that salmon place on their native habitat. For this reason, **special attention must be paid to the remaining salmon rivers.** Arctic rivers here in Lapland are very different compared to Central European rivers. The river nature here is delicate and biodiversity is narrow. In winter, when all the water falls as snow and all the water on the ground is frozen, **only groundwater flows in the riverbeds.** The River Muonio, the main tributary of the River Torne, which flows 100-400 m³/s in summer, can only flow at 8-10 m³/s under the ice. So **in winter there is very little water in the River Muonio but as groundwater it is the cleanest water, and in that water salmon are born.** **The value of the River Torne and many other arctic rivers have is in their salmon.** The River Torne (510 km) and its tributary the River Muonio (387 km) are in Natura 2000 both in Finland FI1301912 and in Sweden SE0820430.

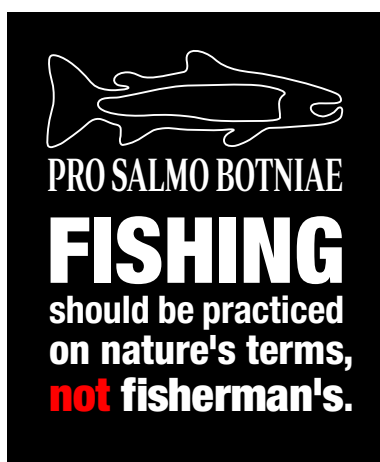
In The Valley of The River Tornio [*Tornionjoki*], the 23th of June 2025

Sincerely yours

Kalervo Aska

Brynolf Tjärner

The Chairmans of The Tornio-Muonio River Society in Finland and in Sweden



The Tornio-Muonio River Society <<http://www.tornionjoki.fi/jokiseura>> is a home river association established by special permission from the Finnish Government to operate on both sides of the Finnish-Swedish border rivers in Finland and Sweden. The statutory board of the association consists of members elected from all municipalities in the border river valley in Finland and Sweden. We have been working for 40 years for the benefit of our people and our salmon. We say *our salmon* because salmon has been a very important nature resource for our people as long as Lapland has been inhabited. The 510 km long Tornionjoki and the 387 km long Muonionjoki, which flows into it, are the best preserved salmon rivers in the European Union. The rivers are listed in the Nature 2000 network of nature protection areas: in Finland FI1301912 and Sweden SE0820430.