



MarinTrust Whole fish fishery assessment report

Document TEM-002 (prev. FISH2) - Version 3.0

Issued June 2024 – Effective June 2024

Denmark - Herring (Clupea harengus) and sprat (Sprattus sprattus) - FAO 27, ICES 25-29, 32 (excluding Gulf of Riga)

*Surveillance 1
WF09*

Table 1: Whole fish fishery assessment scope

Fishery name	Denmark - Herring (<i>Clupea harengus</i>) and sprat (<i>Sprattus sprattus</i>) - FAO 27, ICES 25-29, 32 (excluding Gulf of Riga)
MarinTrust report code	WF09
Type 1 species (common name, Latin name)	Herring (<i>Clupea harengus</i>) and sprat (<i>Sprattus sprattus</i>)
Fishery location	FAO 27, ICES 25-29, 32 (excluding Gulf of Riga)
Gear type(s)	Pelagic trawl
Management authority (country/state)	European Union, Denmark

Table 2: Applicant and Certification Body details

Application details			
Applicant(s)		FF Skagen A/S, Thyborøn (TripleNine)	
Applicant country		Denmark	
Certification Body details			
Name of Certification Body		LRQA	
Contact Information for CB (e.g. email address/address/telephone number)		E: mt-ca@lrqa.com LRQA, 4-5 Lochside Way, Edinburgh Park, EH12 9DT T: +44 800 092 0452	
Fishery Assessor name		Jim Missen	
CB Peer Reviewer name		Phoebe Schouten	
Number of assessment days	2	Assessment period	09/2026 to 09/2027

Table 3: Assessment outcome

Assessment outcome (See Table 4 for a summary of assessment determination)		Approve
Approval validity	Valid from: 09/2026	Valid until: 09/2027
CB peer reviewer evaluation		Agree with assessment determination
Fishery Assessment Peer Review Group external peer reviewer evaluation		Agree with assessment determination

Table 4: Assessment determination

Assessment determination Summary of assessment and outcome

The herring (*Clupea harengus*) and sprat (*Sprattus sprattus*) pelagic trawl fishery in the Baltic Sea (excluding the Gulf of Riga) targets two species that together comprise approximately 99.6% of total landings. Of all herring caught in the Central Baltic, an average of 0.47% originates from the Gulf of Riga stock, resulting in 0.2% of total landings being calculated as originating from the Gulf of Riga stock. Bycatch occurs in very small quantities and only three-spined stickleback (*Gasterosteus aculeatus*) meets the 0.1% threshold for requiring assessment under the MarinTrust framework, with the remaining 0.1% comprised of multiple species. All species considered in this assessment are listed as Least Concern by the IUCN and none are included in any CITES Appendix, making them eligible for approval as MarinTrust Whole Fish material. Herring and sprat are managed under species-specific management frameworks and meet the MarinTrust management requirements (Category M).

Central Baltic herring and sprat were initially assessed against the MarinTrust Category A requirements, reflecting the presence of established management frameworks, surveillance, control, and enforcement arrangements. Both stocks are assessed annually by ICES as Category 1 stocks, with removals incorporated into the stock assessment process. However, both Central Baltic herring and sprat failed specific Category A clauses because removals exceeded the stock assessment advice by more than 10% for herring in 2023 and sprat in 2025. In addition, Central Baltic herring lacked sufficient evidence to demonstrate that a decline below the limit reference point would result in fishery closure. In accordance with MarinTrust guidance, both stocks were subsequently assessed against Category B, Table B(a), where they passed.

Gulf of Riga herring is managed under a species-specific management regime but represents less than 5% of the total catch composition. Accordingly, the species was assessed under Category C and met the requirements to pass.

Three-spined stickleback is not managed under a species-specific management regime and represents less than 5% of the total catch composition. Accordingly, the species was assessed under Category D and meets the requirements for a Productivity-Susceptibility Analysis (PSA).

The fishery uses pelagic trawls that operate within the water column and therefore have minimal interaction with seabed habitats. The ICES Working Group on Bycatch of Protected Species (WGBYC) collates and analyses information on endangered, threatened, and protected (ETP) species, providing evidence that supports the assessment of compliance with MarinTrust ETP requirements. In relation to marine ecosystem impacts, the fishery is managed under an ecosystem-based approach that seeks to ensure the long-term conservation and sustainable use of marine resources while safeguarding ecosystem function. Consequently, the fishery meets the MarinTrust requirements relating to marine habitats, ETP species, and ecosystem impacts.

The herring and sprat fishery in FAO 27, ICES 25-29, 32 (excluding Gulf of Riga) passed the MarinTrust requirements in this assessment; therefore, it is recommended for use as raw material in MarinTrust-certified products.

Last data accessed: 3 September 2026

Summary of CB peer review

The assessor has clearly laid out the justification for the species categorisation and scoring of each category. The peer reviewer agrees with the scoring of both Sprat and Herring under Category A,

	and then further scoring under Category B due to neither fully meeting the Category A requirements. Both Three-spined stickleback and Gulf of Riga herring are categorised correctly, and the rationale provided is clear to justify the pass scores. For the management and Ecosystem scores the rationales are clear and contain updates since the last assessment where available. Overall, the report is well written and the peer reviewer agrees with all outcomes.
Summary of external peer review (see Appendix 1 for the full peer review report)	Several weaknesses should be mentioned. The most important are the incomplete external peer-review documentation, the need to better explain the transition from Category A failures to Category B passes, uncertainties concerning Russian catches and herring–sprat misreporting, and the use of relatively old catch-composition data. Overall, the document is considered a technically advanced and well-supported draft, but it requires additional quality assurance and more transparency before being regarded as a fully finalized assessment.
Notes for on-site auditor	None

Table 5: General results

Section	Outcome (Pass/Fail)
M1 - Management Framework	Pass
M2 - Surveillance, Control and Enforcement	Pass
E1 - Impacts on ETP Species	Pass
E2 - Impacts on Habitats	Pass
E3 - Ecosystem Impacts	Pass

Table 6: Species-specific results

See Table 7 for further details of species categorisation.

Category	Species name (common & Latin name)	Outcome (Pass/Fail/n/a)	
Category A	Sprat (<i>Sprattus sprattus</i>)	A1	Pass
		A2	Pass
		A3	Fail
		A4	Pass
Category A	Herring (<i>Clupea harengus</i>), Central Baltic Sea	A1	Pass
		A2	Pass
		A3	Fail
		A4	Fail
Category B	Sprat (<i>Sprattus sprattus</i>) (failed A)	Pass	
Category B	Herring (<i>Clupea harengus</i>), Central Baltic Sea (failed A)	Pass	
Category C	Herring (<i>Clupea harengus</i>), Gulf of Riga	Pass	
Category D	Three-spined stickleback (<i>Gasterosteus aculeatus</i>)	Pass	

Table 7: Species categorisation table

List of all the species assessed. Type 1 species are assessed against Category A or Category B. Type 1 species must represent 95% of the total annual catch. Type 2 species are assessed against Category C or Category D. Type 2 species may represent a maximum of 5% of the annual catch. Species that comprise less than 0.1% of the catch are not required to be assessed or listed here.

Species name (common & Latin name)	Stock	CITES listed yes/no	IUCN Red list Category	% catch composition	Management (Y/N)	Category (A, B, C or D)
Sprat (<i>Sprattus sprattus</i>)	Baltic Sea	No	Least Concern ¹	55.4%	Y	A (fail), B
Herring (<i>Clupea harengus</i>)	Central Baltic Sea	No	Least Concern ²	44.2%	Y	A (fail), B
Herring (<i>Clupea harengus</i>)	Gulf of Riga	No	Least Concern ²	0.2%	Y	C
Three-spined Stickleback (<i>Gasterosteus aculeatus</i>)	Baltic Sea	No	Least Concern ³	0.1%	N	D

Rationale

The Denmark, Estonia, Germany, Sweden Baltic herring (*Clupea harengus*) and sprat (*Sprattus sprattus*) fishery was previously MSC certified prior to being combined with the FFA Finland and SPFPO Sweden Gulf of Bothnia herring fishery certificate.

In lieu of more recent catch composition data being available or provided by the applicant, the Danish landings presented in the 2023 surveillance report were used to determine the catch composition used in this report (Table 1)⁴. These landings are recorded from Danmarks Pelagiske Producentorganisation (DPPO) and Danmarks Fiskeriforening Producent Organisation (DFPO) vessels in 2021. The catch composition was calculated by taking the average of sprat and herring targeted-fishery landings. Additionally, the inclusion of Gulf of Riga herring was determined by taking the mean of the stock caught in the Central Baltic Sea between 2021 and 2025 against the mean of Central Baltic herring catches over the same period⁵. This suggests that Gulf of Riga herring accounts for 0.47% of herring caught in the Central Baltic Sea. The resulting catch composition was approximately 55.4% sprat, 44.2% Central Baltic herring, 0.2% Gulf of Riga herring, and 0.1% three-spined stickleback (*Gasterosteus aculeatus*). The remaining 0.1% was comprised of multiple species, with none exceeding the 0.1% threshold necessary to require assessment under the MarinTrust framework and, as such, have not been assessed in this report.

Table 1. Danish landings by DPPO and DFPO vessels in herring and sprat fisheries in the Baltic Sea

in 2021⁴.

Species			Sprat targeted fishery	
English	Scientific	Danish	kg	%
Sprat	<i>Sprattus sprattus</i>	Brisling	20722059	89%
Herring	<i>Clupea harengus</i>	Sild	2549144	11%
Flounder	<i>Platichthys flesus</i>	Skrubbe	8336	0.0%
Plaice	<i>Pleuronectes platessa</i>	Rødspætte	6386	0.0%
Three-spined stickleback	<i>Gasterosteus aculeatus</i>	Hundestjle	988	0.0%
Cod	<i>Gadus Morhua</i>	Torsk	608	0.0%
Mackerel	<i>Scomber scombrus</i>	Makrel	22	0.0%
Anchovy	<i>Engraulis encrasicolus</i>	Ansjos	13	0.0%
Perch	<i>Perca fluviatilis</i>	Aborre		
Garfish	<i>Belone belone</i>	Hornfisk		
Pollack	<i>Pollachius virens</i>	Mørksej		
Shells		Skaller		
Total			23287556	100%

Species	Herring targeted fishery	
	kg	%
Herring	3925333	78%
Sprat	1104472	22%
Three-spined stickleback	11360	0.2%
Shells	5	0.0%
Flounder	5	0.0%
Perch	2	0.0%
Pollack	2	0.0%
Cod	2	0.0%
Garfish	1	0.0%
Anchovy		
Mackerel		
Plaice		
Total	5041182	100%

Sprat and Central Baltic herring were both assessed as Category A species, as they are listed as Least Concern by the IUCN, are not included in any CITES Appendix, are managed by the Danish Fisheries Agency, and collectively comprise more than 95% of the fishery's total catch.

Gulf of Riga herring was assessed as a Category C species, as it is listed as Least Concern by the IUCN, is not included in any CITES Appendix, is managed by the Danish Fisheries Agency, and comprises less than 5% of the fishery's total catch.

Three-spined stickleback was assessed as a Category D species, as it is listed as Least Concern by the IUCN, is not included in any CITES Appendix, is not managed under a species-specific management regime, and comprises less than 5% of the fishery's total catch.

References

1. Nedreaas, K., Florin, A.-B., Cook, R. & Fernandes, P. 2018. *Sprattus sprattus* (errata version published in 2019). The IUCN Red List of Threatened Species 2018: e.T198583A143833310. <https://dx.doi.org/10.2305/IUCN.UK.2018-2.RLTS.T198583A143833310.en>
2. Herdson, D. & Priede, I.G. 2010. *Clupea harengus*. The IUCN Red List of Threatened Species 2010: e.T155123A4717767. <https://dx.doi.org/10.2305/IUCN.UK.2010-4.RLTS.T155123A4717767.en>
3. NatureServe & Ford, M. 2024. *Gasterosteus aculeatus*. The IUCN Red List of Threatened Species 2024: e.T225345695A176077275. <https://dx.doi.org/10.2305/IUCN.UK.2024-2.RLTS.T225345695A176077275.en>
4. LRQA (2023). Denmark, Estonia, Germany, Sweden Baltic herring and sprat. Second Surveillance Report. <https://fisheries.msc.org/en/fisheries/denmark-estonia-germany-sweden-baltic-herringand-sprat/@assessments>
5. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In Report of the ICES Advisory Committee, 2026 (ICES Advice 2026, her.27.25-2932). <https://doi.org/10.17895/ices.advice.30932081>

Management requirements

This section, or module, assesses the general management regime applied to the fishery under assessment. It comprises two parts, M1, which evaluates the management framework, and M2, which evaluates surveillance, control and enforcement within the fishery.

- 1.6. All management criteria must be met (pass) for a fishery to pass the Management requirements.
 - 1.6.1. The sub-criteria offer a structured evidence base to demonstrate that the fishery sufficiently meets the management criteria. It is not expected that sub-criteria are assessed independently of the main criterion.

M1 Management framework

M1.1	M1.1 There is an organisation responsible for managing the fishery. <i>In reaching a determination for M1.1, the assessor should consider if the following is in place:</i>
	M1.1.1 The management and administration organisations within the fishery are clearly identified.
	M1.1.2 The functions and responsibilities of the management organisations include the overall regulation, administration, science and data collection and enforcement roles, and are documented and publicly available.
	M1.1.3 Fishers have access to information and/or training materials through nationally recognised organisations.
Outcome	Pass
Rationale Denmark is a member of the European Union (EU), and as such its fisheries are managed in accordance with the Common Fisheries Policy (CFP), the latest reform of which was introduced in 2013 through Regulation (EU) No 1380/2013¹. The CFP aims to ensure that the activities of the fishing and aquaculture sectors are environmentally sustainable in the long term and are managed in a way that aligns with the objectives of achieving economic, social and employment benefits. The CFP provides the foundation for all Danish fisheries regulations, and each Member State is responsible for its implementation. However, several regulations differ to reflect specific Danish conditions. The Danish Fisheries Agency, a part of the Ministry of Food, Agriculture and Fisheries, is responsible for ensuring adherence to EU standards². The functions of the Danish Fisheries Agency include the management and control of the fisheries sector, supervision of production levy funds, and the administration of the overall regulation³. Each year, the Council of the European Union, in its Agriculture and Fisheries configuration, receives	

proposals from the European Commission on catch limits for the following year. These proposals are discussed among Member States and the Commission until an agreement is reached. The Council then reaches political agreement on the regulations and sets the total allowable catches (TACs), fixes fishing effort limits, and decides on other conservation measures necessary for the sustainability of fish stocks⁴.

In Denmark, fishers have access to information and training materials through the Danish Agency for Higher Education and Science and the Danish Maritime Authority, which are responsible for the maritime training programmes and courses^{5,6}.

Based on the above, the fishery passes Clause M1.1.

References

1. European Commission. (n.d.). Common fisheries policy (CFP). Directorate-General for Maritime Affairs and Fisheries. https://oceans-and-fisheries.ec.europa.eu/policy/common-fisheries-policy-cfp_en
2. Food and Agriculture Organization of the United Nations. (n.d.). Denmark: Fisheries and aquaculture country profile. <https://www.fao.org/fishery/en/facp/dnk>
3. Food and Agriculture Organization of the United Nations. (2025). FAOLEX. <https://www.fao.org/faolex/results/details/fr/c/LEX-FAOC195062/>
4. Council of the European Union. (n.d.). How fishing catch limits and quotas are set. <https://www.consilium.europa.eu/en/policies/how-fishing-catch-limits-and-quotas-are-set/>
5. Uddannelses- og Forskningsstyrelsen. (n.d.). UFSN. <https://ufsn.dk/>
6. Danish Maritime Authority. (n.d.). Maritime courses. <https://www.dma.dk/seafarers-and-manning/maritime-courses>

M1.2	M1.2 Fishery management organisations are legally empowered to take management actions. <i>In reaching a determination for M1.2, the assessor should consider if the following is in place:</i>
	M1.2.1 There are legal instruments in place to give authority to the management organisation(s) which can include policies, regulations, acts or other legal mechanisms.
	M1.2.2 Vessels wishing to participate in the fishery must be authorised by the management organisation(s).
	M1.2.3 The management system has a mechanism in place for the resolution of legal disputes.
	M1.2.4 There is evidence of the legal rights of people dependent on fishing for food or livelihood.
Outcome	<i>Pass</i>

Rationale

In Denmark, all management actions are undertaken by national legislation arising from the implementation of CFP regulations, with some variations to reflect the characteristics of the fisheries in the country. The Fisheries and Fish Farming Act (the Fisheries Act), originally created in 1999 as the Fisheries Act and most recently reformed in 2023, serves as the principal legal framework for fisheries management in Denmark¹. The provision of the Act provides the management organisation the ability to undertake management actions such as implementation of European Union directives and regulations, managing the effects of fishing on the environment, procedures for prosecuting fishing offences, and addressing disputes between fishers.

All commercial fishing vessels that fish in Danish waters on the basis of Danish fishing quotas are required to be registered in the vessel register of the Danish Maritime Authority as well as the vessel register of the Danish Fisheries Agency². The fleet management system in Denmark is based on an entry-exit regime, and a permit must be granted by the Danish Fisheries Agency³.

Denmark's fisheries management system provides mechanisms for the administrative and judicial review of fisheries-related decisions within Denmark's national legal system and the EU legal framework. Decisions made under the Danish Fisheries Act may, where provided for by legislation, be appealed to the Environment and Food Appeals Board and may also be subject to review by the Danish courts⁴. Complaints concerning maladministration by the Danish Fisheries Agency may be submitted to the Parliamentary Ombudsman (Folketingets Ombudsmand), which investigates the conduct of public authorities⁵. Where a dispute before a Danish court raises questions concerning the interpretation or validity of EU law, including under the CFP, the national court may refer the matter to the Court of Justice of the European Union (CJEU) for a preliminary ruling⁴.

Denmark has policies explicitly aimed at supporting small-scale coastal fishers, like Chapter 5 of the Executive Order on the Regulation of Fisheries in 2007 and Certain Conditions for Fisheries in Subsequent Years⁶. This Executive Order reserves portions of national quotas specifically for coastal fishers with small vessels (under 17 m) and that undertake short trips⁶. Additionally, a fisheries package has enhanced these rights by increasing quota allocation to coastal fishers, introducing a "locked group" system that allows fishers to secure their quotas and capacity within a collective, preventing speculative selling and prioritizing long-term access, and offering quota-based support to young or new fishers to help them enter the sector^{7,8}.

Based on the above, the fishery passes Clause M1.2.

References

1. Danish Ministry of Food, Agriculture and Fisheries. (2023). Consolidation Act No. 205 of 8 February 2023 on commercial fishing. Retsinformation. <https://www.retsinformation.dk/eli/lt/2023/205>
2. Danish Maritime Authority. (n.d.). Fishing ships excluding Greenlandic ships. <https://www.dma.dk/ship-survey-and-registration/ship-registration-and-fees/fishing-ships-excluding-greenlandic-ships>
3. European Commission. (n.d.). [Document on fisheries management and control]. European Commission. <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/546c1d41-4922-4ebc-ba95-785832333830/download>
4. European Commission. (n.d.). Access to justice at member state level: Denmark. European e-

Justice Portal. https://e-justice.europa.eu/access-justice-member-state-level/dk_en
5. Danish Parliamentary Ombudsman. (n.d.). The Danish Parliamentary Ombudsman. https://www.en.ombudsmanden.dk/
6. Danish Ministry of Justice. (2006). Administration of justice act (Consolidation Act No. 1535 of 19 December 2006). Retsinformation. https://www.retsinformation.dk/eli/lt/2006/1535#P53
7. Eurofish. (n.d.). The Danish coastal fishery faces challenges, but also opportunities. https://eurofish.dk/the-danish-coastal-fishery-faces-challenges-but-also-opportunities/
8. Eurofish. (n.d.). Reconciling sometimes conflicting interests. https://eurofish.dk/reconciling-sometimes-conflicting-interests/

M1.3	M1.3 There is an organisation responsible for collecting data and (scientifically) assessing the fishery.
	<i>In reaching a determination for M1.3, the assessor should consider if the following is in place:</i>
	M1.3.1 The organisation(s) responsible for collecting data and assessing the fishery is/are clearly identified.
	M1.3.2 The management system receives scientific advice regarding stock, non-target species and ecosystem status.
	M1.3.3 Scientific advice is independent from the management organisation(s) and transparent in its formulation through a clearly defined process.
Outcome	<i>Pass</i>
Rationale The EU's data collection framework outlines Member States obligations to collect, manage, and make available a wide range of fisheries and aquaculture data needed for scientific advice. This includes biological, environmental, economic, and social data. Member States data collection activities are financially supported by the EU. Data collection needs to ensure accuracy, reliability, and timeliness, safe storage, and improved availability of data¹. The International Council for the Exploration of the Sea (ICES), which is an intergovernmental marine science organisation meeting societal needs for impartial evidence on the state and sustainable use of our seas and oceans, through the Baltic Fisheries Assessment Working Group (WGBFAS), assesses each year the herring and sprat fisheries, providing advice on fishing opportunities, catch, and effort, including the TAC, each year and an overview of stock development over time². As required under Regulation (EC) No 1921/2006, the Danish Fisheries Agency is responsible for the collection of logbooks and landing data, which are provided annually to ICES as part of the data call^{3,4}. The organisation that is the primary provider of scientific information in Denmark is the National Institute of Aquatic Resources (DTU Aqua), part of the Technical University of Denmark⁵. Based on the above, the fishery passes Clause M1.3.	

References

1. European Commission. (n.d.). Scientific advice and data collection. Directorate-General for Maritime Affairs and Fisheries. https://oceans-and-fisheries.ec.europa.eu/science-observation-and-data/scientific-advice-and-data-collection_en
2. International Council for the Exploration of the Sea. (n.d.). About ICES. <https://www.ices.dk/about-ICES/Pages/default.aspx>
3. European Parliament and Council of the European Union. (2006). Regulation (EC) No 1921/2006 of the European Parliament and of the Council of 18 December 2006 on the submission of statistical data on landings of fishery products in Member States. Official Journal of the European Union, L 403, 1–8. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1921-20140110>
4. International Council for the Exploration of the Sea. (2025). Data Call Guidelines. <https://doi.org/10.17895/ices.pub.28163492.v3>
5. Technical University of Denmark. (2025). DTU Aqua. <https://www.aqua.dtu.dk/english/>

M1.4	M1.4 The fishery management system is based on the principles of sustainable fishing and a precautionary approach. <i>In reaching a determination for M1.4, the assessor should consider if the following is in place:</i> M1.4.1 A policy or long-term management objective for sustainable harvesting based on the best scientific evidence and a precautionary approach is publicly available and implemented for the fishery.
Outcome	<i>Pass</i>
Rationale The CFP underscores the principles of sustainable fishing and a precautionary approach in Objective 1 of Regulation (EU) No. 1380/2013. Here it states the CFP “shall ensure that fishing and aquaculture activities are environmentally sustainable in the long-term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies”¹. As previously mentioned, the essence of this document is instilled within the national fisheries regime of Denmark in The Fisheries Act. The Fisheries Act states that the purpose of the Act that “is to ensure a sustainable basis for commercial fishing and related industries, as well as the possibility of recreational fishing, through management that ensures the protection and recovery of living resources in salt and fresh water and the protection of other animal and plant life”². As part of the EU, Danish fisheries in the Baltic are managed according to a Multiannual Plan (MAP), which contains goals for fish stock management, detailed roadmap for achieving objectives, fishing effort restrictions, specific control rules and technical measures, and measures for implementing the landing obligation, safeguards for remedial action and review clauses³. Regulation (EU) No 2016/1139 established the MAP objectives and target for herring and sprat	

fisheries in the Baltic Sea, including the Gulf of Riga⁴. Article 3 indicates that:

1. The plan shall contribute to the achievement of the objectives of the CFP.
2. The plan shall contribute to the elimination of discards by avoiding and reducing, as far as possible, unwanted catches, and to the implementation of the landing obligation for the species which are subject to catch limits and to which this Regulation applies.
3. The plan shall implement the ecosystem-based approach to fisheries management in order to ensure that negative impacts of fishing activities on the marine ecosystem are minimised.
4. Measures under the plan shall be taken in accordance with the best available scientific advice.

Additionally, Denmark has shown a commitment to sustainable harvesting through its programme run with the European Maritime, Fisheries and Aquaculture Fund (EMFAF) programme. The Danish programme corresponds to the 2021 to 2027 period and intends to implement Priorities 1 and 2 of the EMFAF. Priority 1 relates fisheries and the fostering sustainable fisheries and the restoration and conservation of aquatic biological resources⁵.

Based on the above, the fishery passes Clause M1.4.

References

1. European Parliament and Council of the European Union. (2013). Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy. Official Journal of the European Union, L 354, 22–61. <https://eur-lex.europa.eu/eli/reg/2013/1380/oj/eng>
2. Danish Ministry of Food, Agriculture and Fisheries. (2023). Consolidation Act No. 205 of 8 February 2023 on commercial fishing. Retsinformation. <https://www.retsinformation.dk/eli/ta/2023/205>
3. European Commission. (n.d.). Multiannual plans. Directorate-General for Maritime Affairs and Fisheries. https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/multiannual-plans_en
4. European Parliament and Council of the European Union. (2016). Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks. Official Journal of the European Union, L 191, 1–15. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R1139>
5. European Commission. (n.d.). European Maritime, Fisheries and Aquaculture Fund programme: Denmark. Directorate-General for Maritime Affairs and Fisheries. https://oceans-and-fisheries.ec.europa.eu/document/download/a4e930c0-8083-4776-a30b-576eada616ae_en?filename=emfaf-programme-denmark-summary_en.pdf

M1.5	M1.5 There is a clearly defined decision-making process which is transparent, with processes and results made publicly available.
	<i>In reaching a determination for M1.5, the assessor should consider if the following is in place:</i>
	M1.5.1 There is participatory engagement through which fishery stakeholders and other stakeholders can access, provide information, consult with, and respond to, the management systems' decision-making process. M1.5.2 The decision-making process is transparent, with results made publicly

	available.
	M1.5.3 The fishery management system is subject to periodic internal or external review to validate the decision-making process, outcomes and scientific data.
Outcome	<i>Pass</i>
Rationale The fisheries management decision-making process relevant to this fishery is transparent, with resources and results being publicly available. This ethos is reflected both in the CFP and in Danish national legislation. ICES advice, which guides relevant fisheries management advice is published online, while decisions and relevant documents at the European Union level are released on the European Commission website. All information used in the production of this MarinTrust assessment is publicly available online. Based on the above, the fishery passes Clause M1.5.	
References	

M2 Surveillance, control and enforcement

M2.1	M2.1 There is an organisation responsible for monitoring compliance with fishery laws and regulations. <i>In reaching a determination for M2.1, the assessor should consider if the following is in place:</i>
	M2.1.1 There is an organisation responsible for monitoring compliance with specific monitoring, control and surveillance (MCS) mechanisms in place.
	M2.1.2 There are relevant tools or mechanisms used to minimise IUU fishing activity.
	M2.1.3 There is evidence of monitoring and surveillance activity appropriate to the intensity, geography, management control measures and compliance behaviour of the fishery.
Outcome	<i>Pass</i>
Rationale Compliance with fishery laws and regulations in the EU is achieved through a multifaceted approach. The role of the EU fisheries control system is to ensure compliance with the CFP¹. Fisheries control is the remit of Member States who are responsible for controlling their fishing activities in accordance with the national regulations, while then European Commission verifies	

how they fulfil their responsibilities. In Denmark, this is the Danish Fisheries Agency.

Through the Fisheries Act, the Danish Fisheries Agency is legally empowered to:

- Inspect fishing vessels at sea, in port, and during landing,
- Control catches, logbooks, and landing declarations,
- Monitor and enforce compliance with National fisheries legislation and EU regulations,
- Operate the Vessel Monitoring System (VMS) and Electronic Reporting System (ERS)
- Conduct risk-based inspections of fishing gear and bycatch, fishing licenses and permits, and minimum sizes and closed areas/seasons,
- Apply penalties for non-compliance, such as fines, quota deductions, and license suspensions or revocations².

The European Fisheries Control Agency (EFCA) is a European Union agency established in 2005 to improve coordination of individual Member States compliance activities. EFCA's mission is to promote the highest common standards for control, inspection, and surveillance under the CFP³. Its primary role is to organise coordination and cooperation between national control and inspection activities so that the rules of the CFP are respected and applied effectively.

In practice, organisational responsibility for monitoring compliance with fishery laws and regulations is carried out by the Member States' control authorities. Joint deployment plans (JDP) are a coordinated deployment of national means to monitor and inspect fishing activities relevant to the CFP⁴. The JDP for the Baltic Sea, which coordinates actions between Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland, and Sweden, has been in place since 2007⁵.

Based on the above, the fishery passes Clause M2.1.

References

1. European Commission. (n.d.). EU fisheries control system. Directorate-General for Maritime Affairs and Fisheries. https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/enforcing-rules/eu-fisheries-control-system_en
2. Danish Ministry of Food, Agriculture and Fisheries. (2023). Consolidation Act No. 205 of 8 February 2023 on commercial fishing. Retsinformation. <https://www.retsinformation.dk/eli/lt/2023/205#P117>
3. European Fisheries Control Agency. (n.d.). Mission and strategy. <https://www.efca.europa.eu/en/content/mission-and-strategy>
4. European Fisheries Control Agency. (n.d.). Joint deployment plans in EU waters. <https://www.efca.europa.eu/en/content/joint-deployment-plans-eu-waters>
5. European Fisheries Control Agency. (n.d.). Baltic Sea Joint Deployment Plan. <https://www.efca.europa.eu/en/what-we-do/operational-coordination/joint-deployment-plans/baltic-sea>

M2.2

M2.2 There is a framework of sanctions which are applied when infringements against laws and regulations are discovered.

In reaching a determination for M2.2, the assessor should consider if the following is in place:

M2.2.1 The laws and regulations provide for penalties or sanctions that are

	adequate in severity to act as an effective deterrent.
	M2.2.2 There is no evidence of systematic non-compliance.
Outcome	<i>Pass</i>

Rationale

All EU Member States are required to operate a system of sanctions in line with EU fisheries controls to ensure compliance with the CPF. These sanctions are to be 'dissuasive, proportionate, and effective'. To ensure continuity in the application of fishing rules and infringements between EU Member States, the Control Regulations set out minimum sanctions and points resulting from serious infringements¹.

Since 2012, EU Member States have been required to operate a point system to sanction fishing license holders and fishing vessel masters when they commit serious infringements. Any vessel that accumulates more than a certain number of points in a three-year period will have its fishing licence suspended for at least two months. For repeat offences, the penalty increases to four, eight and twelve months respectively. If, after the end of the fourth suspension period, the offender again incurs the necessary number of points, the fishing licence must be withdrawn permanently². This framework of sanction application set out in the Control Regulations, has been transposed into Danish national law under Chapter 22 of the Fisheries Act³.

Based on the above, the fishery passes Clause M2.2.

References

1. European Parliament and Council of the European Union. (2023). Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 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. Official Journal of the European Union, L 2023/2842, 1–105. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302842
2. European Commission. (n.d.). Infringements and sanctions. Directorate-General for Maritime Affairs and Fisheries. https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/enforcing-rules/infringements-and-sanctions_en
3. Danish Ministry of Food, Agriculture and Fisheries. (2023). Consolidation Act No. 205 of 8 February 2023 on commercial fishing. Retsinformation. <https://www.retsinformation.dk/eli/lt/2023/205>

M2.3	M2.3 There is substantial evidence of widespread compliance in the fishery, and no substantial evidence of IUU fishing.
	<i>In reaching a determination for M2.3, the assessor should consider if the following is in place:</i>
	M2.3.1 The level of compliance is documented and updated routinely, statistically reviewed and available.

	M2.3.2 Fishers provide additional information and cooperate with management/enforcement agencies/organisations to support the effective management of the fishery.
	M2.3.3 The catch recording and reporting system is sufficient for effective traceability of catches per vessel and supports the prevention of IUU fishing.
Outcome	<i>Pass</i>

Rationale

The Danish Annual Report on fishing fleet capacity in 2024, the latest report available, provides information on infringements and inspections in relation to management measures¹. A total of 1,476 vessels inspections were conducted over the period, comprising 1,428 port inspections and 362 inspections at sea. These figures mirror those reported over the preceding years, in 2023 and 2022. During 2024, a total of 168 infringements were recorded, arising to port and at sea inspections. This is comparative to the figures provided in 2023 and 2022, which were 116 and 151, respectively^{2,3}. While figures are not yet provided for 2025, the preceding years indicate a robust and transparent enforcement regime is in place for the Danish fishing fleet as a whole. Based on the above, there is substantial evidence of widespread compliance and no significant evidence of IUU fishing.

The EFCA publishes quarterly reports detailing control and enforcement activities under the Baltic Sea JDP⁴. The most recent available report is from January to March 2026, which states that as part of the JDP, there were (across the entire Baltic Sea area) 694 inspections carried out ashore with 39 suspected infringements⁵. At sea, during the reporting period, 87 inspections were carried out with reported 93 sightings and 10 suspected infringements. No suspected infringements were detected related to sightings. Aircraft surveillance reported 108 air sightings with no suspected infringements detected during the surveillance flights carried out in this period.

Based on the above, the fishery passes Clause M2.3.

References

1. European Commission. (2025). Annual report on fishing fleet capacity 2024 – Denmark. European Commission. <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/546c1d41-4922-4ebc-ba95-785832333830/download>
2. Danish Agricultural and Fisheries Agency. (2024). Annual report on fishing fleet capacity 2023 – Denmark. Danish Agricultural and Fisheries Agency. <https://lfst.dk/Media/638693399235473740/DK%20Fleet%20report%202023.pdf>
3. Danish Fisheries Agency. (2023). Annual report on fishing fleet capacity 2022 – Denmark. Danish Fisheries Agency. https://fiskeristatistik.fiskeristyrelsen.dk/stat/flaaderapport/DK_Fleetreport_2022.pdf
4. European Fisheries Control Agency. (n.d.). Baltic Sea Joint Deployment Plan. European Fisheries Control Agency. <https://www.efca.europa.eu/en/what-we-do/operational-coordination/joint-deployment-plans/baltic-sea>
5. European Fisheries Control Agency. (2026). Joint Deployment Plan – Baltic Sea: 3-month

Species requirements

This section, or module, comprises of four species categories. Each species in the catch is subject to an assessment against the relevant species category in this section (see clauses 1.2 and 1.3 and Table 6).

Type 1 species can be considered the ‘target’ or ‘main’ species in the fishery under assessment. They make up the bulk of the catch and are subjected to a detailed assessment. Type 1 species must represent 95% of the total annual catch. If a species-specific management regime is in place for a Type 1 species, it shall be assessed under Category A. If there is no species-specific management regime in place for a Type 1 species, it shall be assessed under Category B.

Type 2 Species can be considered the ‘non-target’ species in the fishery under assessment. They comprise a small proportion of the annual catch and are subjected to a relatively high-level assessment. Type 2 species may represent a maximum of 5% of the annual catch. If a species-specific management regime is in place for a Type 2 species, it shall be assessed under Category C. If there is no species-specific management regime in place for a Type 2 species, it shall be assessed under Category D.

Species that comprise less than 0.1% of the catch are not required to be assessed or listed here.

Category A species

2.1. All clauses must be met for a species to pass the Category A assessment.

2.1.1. If a species fails any of the Category A clauses, it should be re-assessed as a Category B species.

Sprat (*Sprattus sprattus*)

A1 Data collection

A1.1	A1.1 Landings data are collected such that the fishery-wide removals of this species are known.
Outcome	<i>Pass</i>
Rationale	
Data is submitted by Denmark, as ICES Member Country, to the WGBFAS. The CFP places a clear	

obligation on Member States to account for and land all catches unless specific exemptions apply.

These reporting requirements are set out in the EU Fisheries Control System through the Fisheries Control Regulation (EC Regulation No. 1224/2009), which requires each vessel to record catch data (target species and bycatch) in logbooks and complete a landing declaration specifying all quantities of each species landed¹. This information must be transmitted to the competent authority of each Member State, which then provides the information to the European Commission.

Sprat catches within the Baltic Sea between 1974 and 2025 are displayed in Figure 1. Total ICES catch of the stock in 2025 was 194,910 tonnes². Of the ICES catch, Russian Federation landings were not officially reported to ICES, but an estimate is included. Discards in this year were thought to be negligible.

Species misreporting of herring and sprat in mixed catches continues to be an ongoing problem encountered by the WGBFAS. Pelagic stocks in the Baltic Proper (subdivisions 25–29, 32) are mainly taken in pelagic trawl fisheries, of which the majority take herring and sprat simultaneously³. According to the national data submitters, the mixing of pelagic species in the landings is variably taken care of before submitting input data. The extent to which species misreporting has occurred and is occurring is however not well known. Analysis of a questionnaire answered by all Baltic countries in 2012 revealed that misreporting is mainly an issue of the industrial trawl fishery targeting a mix of sprat and herring in nearshore waters³.

The effects of misreporting have been partially quantified and included in the assessment during the 2023 benchmarking where possible⁴. An Intersessional Subgroup (ISSG) made an attempt to provide the benchmark with corrected time series of catch data, for which species misreporting had been corrected. It was concluded that the issue of misreporting could not be addressed adequately by all the countries in time for the benchmark and that the issue needs to be postponed. The effects of central Baltic herring and sprat misreporting on the assessment of both stocks were analysed in the framework of the WKBALPEL and showed a greater sensitivity of spawning stock biomass estimates than of fishing mortality estimates to misreporting⁴. Denmark and Sweden provided an alternative time series of catch data, of which the Danish time series was included in the benchmark assessment³. Since misreporting has only been partly included in the assessment, it still contributes to uncertainty in the assessment and advice.

Consequently, at the time of the 2026 WGBFAS Report, no new information on unallocated catches was presented to the group. Denmark has a relatively small part (<3%) of the Central Baltic Herring EU quota with 10% for Baltic sprat⁴. Misreporting will be further addressed at the next benchmark assessment.

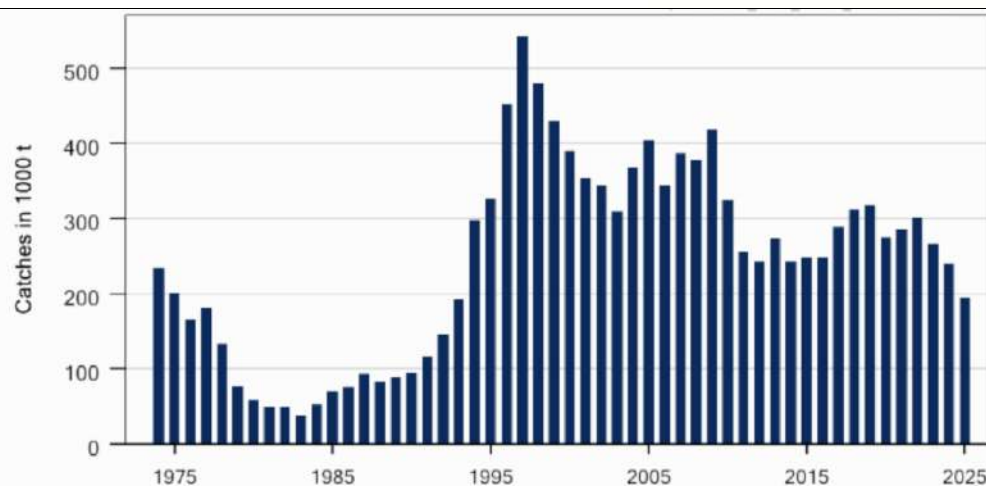


Figure 1. Sprat catch in subdivisions 22–32, excluding the Gulf of Riga between 1974 and 2025².

Based on the above, the fishery passes Clause A1.1.

References

1. Council of the European Union. (2009). Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy. Official Journal of the European Union, L 343, 1–50. <https://eur-lex.europa.eu/eli/reg/2009/1224/oj/eng>
2. International Council for the Exploration of the Sea. (2026). Sprat (*Sprattus sprattus*) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. <https://doi.org/10.17895/ices.advice.30932426>
3. International Council for the Exploration of the Sea. (2026). Baltic Fisheries Assessment Working Group (WGBFAS) 2026 Report. https://ices-library.figshare.com/articles/report/Baltic_Fisheries_Assessment_Working_Group_WGBFAS_2026_Report/32455056
4. International Council for the Exploration of the Sea. (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBALPEL). ICES Scientific Reports, 5(47), 350 pp. <https://doi.org/10.17895/ices.pub.23216492>

A1.2	A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.
Outcome	<i>Pass</i>
Rationale The most recent ICES WGBFAS stock advice was produced in 2026, with the benchmarking completed in 2023¹. The fishery is categorised as an ICES Category 1 fishery, meaning that assessments are quantitative and include stocks with full analytical assessments and forecasts that are either age-/length-structured or based on production models. The input data used include commercial catches, two acoustic surveys (Baltic International Acoustic	

Survey, BIAS and the Baltic Spring Survey, BASS), natural mortality from the multispecies model (SMS) until 2024, mortality in 2025 assumed to be equal to the SMS estimate of mortality for 2024, and a fixed maturity ogive. Catches for the Russian Federation are taken from the Fisheries Agency website^{1,3}.

No information on Russian Federation catches for 2025 was officially reported to ICES¹. Therefore, the Russian Federation catches for these years included in the assessment were based on publicly available information, the quality of which cannot be quantified. Since 2021 Russia has not provided updated data on fishing effort and CPUE². The estimated 2024 catches were retroactively corrected using data from the Russian Federal Fisheries Agency website³.

Russian catches account for around 21% of the total catch of sprat in 2025, which is an increase compared to 17% in 2024¹. No biological information on the composition of Russian catches was available to ICES, and the impact this has on the quality of the assessment cannot be quantified¹.

Based on the above, the fishery passes Clause A1.2.

References

1. International Council for the Exploration of the Sea. (2026). Sprat (*Sprattus sprattus*) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. <https://doi.org/10.17895/ices.advice.30932426>
2. International Council for the Exploration of the Sea. (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBALTPEL). ICES Scientific Reports, 5(47), 350 pp. <https://doi.org/10.17895/ices.pub.23216492>
3. Federal Agency for Fishery. (n.d.). Federal Agency for Fishery. <https://fish.gov.ru/>

A2 Stock assessment

A2.1	A2.1 A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock) and considers all fishery removals and the biological characteristics of the species.
Outcome	<i>Pass</i>
Rationale Baltic Sea sprat is subject to an annual stock assessment carried out by the ICES WGBFAS as a Category 1 stock. The stock was benchmarked in 2023, and the outcomes were implemented in the last assessment published in 2026^{1,2}. The benchmarking process ensures that the stock assessment recognises the most recent available scientific understanding of the species, the stock, the fishery, and the ecosystems within which they occur. The stock assessment is conducted as a whole following the ICES methodology³. The data used for the stock assessment included landing and catch data from all countries exploiting	

the stock, as well as biological data such as age composition, mean weights at age, maturity at age, and natural mortality. Additionally, fishery-independent information from the BIAS and BASS surveys was also utilised².

Based on the above, the fishery passes Clause A2.1.

References

1. International Council for the Exploration of the Sea. (2023). *Benchmark Workshop on Baltic Pelagic stocks (WKBALPEL)*. ICES Scientific Reports, 5(47), 350 pp. <https://doi.org/10.17895/ices.pub.23216492>
2. International Council for the Exploration of the Sea. (2026). Sprat (*Sprattus sprattus*) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. <https://doi.org/10.17895/ices.advice.30932426>
3. International Council for the Exploration of the Sea. (2023). *Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2023.* <https://doi.org/10.17895/ices.advice.22116890>

A2.2	A2.2 The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.
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Outcome	<i>Pass</i>
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Rationale

The annual WGBFAS stock assessment provides an indication of the status of the stock relative to target and limit reference points (Table 2). These were most recently updated in 2023 with MSY $B_{trigger}$ (and MAP MSY $B_{trigger}$) set as 541,000 tonnes and B_{lim} (and MAP B_{lim}) set at 459,000 tonnes¹.

The 2026 stock assessment projected that SSB would be 1,123,434 tonnes and stated that “fishing pressure on the stock is at F_{MSY} and below F_{PA} . SSB is above MSY $B_{trigger}$, B_{PA} , and B_{lim} ” as seen in (Figure 2)¹.

Table 2. Sprat in subdivisions 22–32. Reference points, values, and their technical basis. Weights in tonnes¹.

Framework	Reference point	Value	Technical basis	Source
Maximum sustainable yield (MSY) approach	MSY $B_{trigger}$	541 000	B_{PA}	ICES (2023)
	F_{MSY}	0.34	Stochastic simulations with Beverton–Holt and segmented regression stock-recruitment model	ICES (2023)
Precautionary approach	B_{lim}	459 000	Biomass that produces half of the maximal recruitment in the Beverton–Holt stock-recruitment relationship	ICES (2023)
	B_{PA}	541 000	$B_{lim} \times \exp(1.645 \times \sigma)$, where $\sigma = 0.1$	ICES (2023)
	F_{PA}	0.35	F_{POS} ; the F that leads to SSB $\geq B_{lim}$ with 95% probability	ICES (2023)
Management plan	Multiannual plan (MAP) MSY $B_{trigger}$	541 000	MSY $B_{trigger}$	ICES (2023)
	MAP B_{lim}	459 000	B_{lim}	ICES (2023)
	MAP F_{MSY}	0.34	F_{MSY}	ICES (2023)
	MAP range F_{lower}	0.26–0.34	Consistent with the ranges that result in a $\leq 5\%$ reduction in long-term yield compared with MSY	ICES (2023)
	MAP range F_{upper}	0.34–0.35	Consistent with the ranges that result in a $\leq 5\%$ reduction in long-term yield compared with MSY, constrained by F_{POS}	ICES (2023)

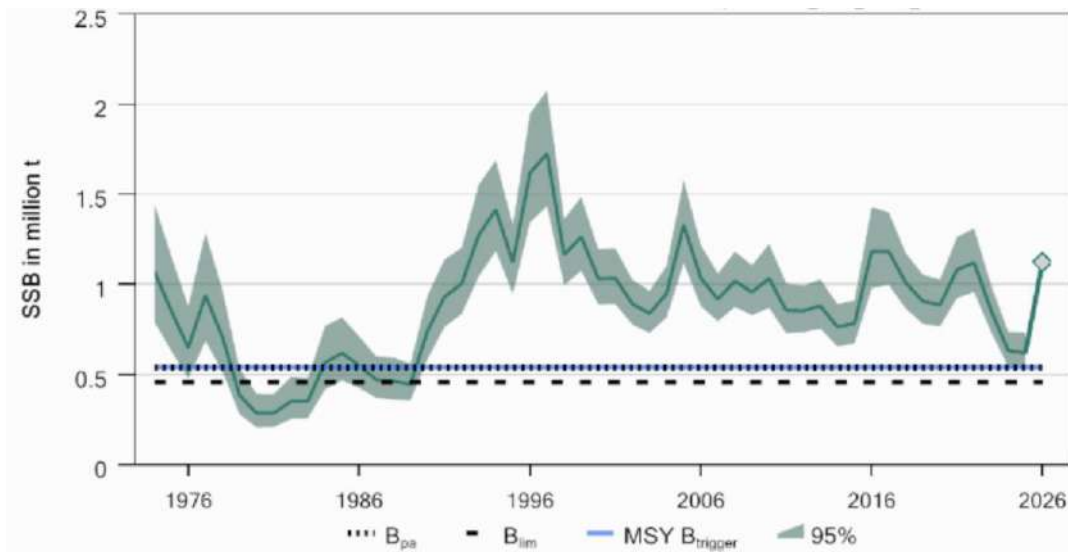


Figure 2. Sprat SSB in subdivisions 22–32 relative to MSY $B_{trigger}$, B_{lim} and B_{pa} . The diamond indicates that SSB at spawning time is predicted for 2026¹.

Based on the above, the fishery passes Clause A2.2.

References

1. International Council for the Exploration of the Sea. (2026). Sprat (*Sprattus sprattus*) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. <https://doi.org/10.17895/ices.advice.30932426>

A2.3

A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.

Outcome *Pass*

Rationale

The ICES advice annually provides an indication of the volume of fishery removals that is appropriate for the current stock status in the form of recommended catches in the upcoming year. The latest catch advice indicates that, when the MAP for the Baltic Sea is applied, the catches in 2027 that correspond to the F ranges in the plan are between 253,819 tonnes and 332,885 tonnes¹. According to the MAP, catches higher than those corresponding to F_{MSY} (324,277 tonnes) can be taken only under conditions specified in the plan, while the entire range is considered precautionary when applying the ICES advice rule¹.

Based on the above, the fishery passes Clause A2.3.

References

1. International Council for the Exploration of the Sea. (2026). Sprat (*Sprattus sprattus*) in

subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. <https://doi.org/10.17895/ices.advice.30932426>

A2.4	A2.4 The assessment is subject to internal or external peer review.
Outcome	<i>Pass</i>
Rationale ICES Technical Guidelines outline a transparent review process for stock assessments, emphasising the importance of public availability of data and methodologies. This is exemplified by the ICES Transparent Assessment Framework, ensuring transparency of ICES advisory processes¹. It makes the data, methods, and results from ICES assessments easy to find, explore, and re-run. This allows stakeholders to examine the input data used in models, ensuring accountability and fostering trust in the assessment outcomes. The review process includes expert evaluations and opportunities for public comment. When the results of the assessments are agreed upon by the ICES groups, they are sent to the ICES Advice Drafting Group, which consists of National Experts who review them. They are finally reviewed by the Advisory Committee (ACOM), which delivers the ICES advice. The ACOM advice is grounded in 10 principles to support ecosystem-based management advice (Figure 3). This ensures that the advice is based on the best available science and data, considered legitimate by both authorities and stakeholders, and relevant and operational to the policy or management challenge in question². Specifically, Principle 7 states that “to ensure that the best available, credible science has been used and to confirm that the analysis provides a sound basis for advice, all analyses and methods are peer reviewed by at least two independent reviewers. For recurrent advice, the review is conducted through a benchmark process; for special requests through one-off reviews”². In the case of Baltic Sea sprat, the stock assessment was most recently subjected to a benchmarking process in 2023 and therefore is subject to peer review³. The benchmark for sprat aimed at considering three issues, namely updating the natural mortality estimates to the new multispecies model (SMS) keyrun, investigating and possibly updating the estimates of misreporting, and changing the assessment model from Extended Survivors Analysis (XSA) to State-Space Assessment Model (SAM)³.	



Figure 3. ICES advice principles².

Based on the above, the fishery passes Clause A2.3.

References

1. International Council for the Exploration of the Sea. (n.d.). Transparent Assessment Framework (TAF). <https://www.ices.dk/data/assessment-tools/Pages/transparentassessment-framework.aspx>
2. International Council for the Exploration of the Sea. (2023). Guide to ICES advisory framework and principles. *In* Report of the ICES Advisory Committee, 2023. <https://doi.org/10.17895/ices.advice.22116890>
3. International Council for the Exploration of the Sea. (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBBALPEL). ICES Scientific Reports, 5(47), 350 pp. <https://doi.org/10.17895/ices.pub.23216492>

A2.5	A2.5 The assessment is made publicly available.
Outcome	<i>Pass</i>
Rationale This assessment and all others can be found on the ICES website ¹ . Based on the information, the fishery passes Clause A2.5.	
References 1. International Council for the Exploration of the Sea. (n.d.). ICES Library. https://iceslibrary.figshare.com	

A3 Harvest strategy

A3.1	A3.1 There is a mechanism in place by which total fishing mortality of this species is restricted.
Outcome	<i>Pass</i>
Rationale Total fishing mortality is restricted through the use of a TAC, which is generally based on the ICES advice, which in turn is based on the Baltic Sea Multiannual Plan (Regulation (EU) 2016/1139 as amended)¹. In Russia, the federal law on Fisheries and Protection of Aquatic Biological Resources mandates the establishment of Total Allowable Catch (TAC) levels for various fish stocks to ensure the conservation of aquatic biological resources². Based on the information, the fishery passes Clause A3.1.	
References 1. European Parliament and Council of the European Union. (2016). Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007. Official Journal of the European Union, L 191, 1–15. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R1139-20240710 2. Russian Federation. (2004). Federal Law No. 166-FZ of 20 December 2004 on fishing and conservation of aquatic biological resources. Federal Agency for Fisheries. https://fish.gov.ru/wp-content/uploads/documents/documenty/federalnye_zakony/Federalnyj-zakon_166-FZ_ot_20-12-2004.pdf	

A3.2	A3.2 Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.
Outcome	<i>Fail</i>
Rationale Since 2018, ICES has provided a range of potential catch recommendations to reflect the specifics of the Baltic Sea MAP. Since the MAP's introduction, the total international quota (the sum of the EU TAC and the Russian autonomous quota) has exceeded the ICES catch advice by some degree in 5 out of the 9 years (Table 3)¹. Most recently, in 2025 and 2026, the international quota was exceeded by approximately 9% and	

6%, respectively. In 2025, the resulting catch (which included an estimate of Russian Federation landings) exceeded the agreed international TAC by 6%¹. The cumulative impact was that the ICES catch advice was exceeded by 15%. This was the second time this has happened since the MAP's introduction. The last occurrence was in 2020, when it was exceeded by 17%¹.

Although the SSB has been estimated to be above the limit reference point and has been since the 1990s, the issue does appear to be somewhat persistent and describes an issue where agreed international catches exceed ICES advice, meaning that where catches are higher, they are significantly larger.

Table 3. Sprat in subdivisions 22-32 (Baltic Sea). ICES advice, total allowable catch (TAC) and ICES estimates of catch. All weights are in tonnes¹.

Year	ICES advice	Catch corresponding to advice	Agreed TAC	ICES catch
2016	MSY approach ($F = 0.26$)	$\leq 205\,000$	243 000**	247 100
2017	MSY approach ($F = 0.26$)	$\leq 314\,000$	303 593**	288 497
2018	MAP target F ranges: F_{lower} to F_{upper} (0.19–0.27), but F higher than $F_{\text{MSY}} = 0.26$ only under conditions specified in MAP	219 152–301 722, but catch higher than 291 715 only under conditions specified in MAP	304 900**	312 188
2019	MAP target F ranges: F_{lower} to F_{upper} (0.19–0.27), but F higher than $F_{\text{MSY}} = 0.26$ only under conditions specified in MAP	225 752–311 523, but catch higher than 301 125 only under conditions specified in MAP	313 100**	317 655
2020	MAP target F ranges: F_{lower} to F_{upper} (0.19–0.27), but F higher than $F_{\text{MSY}} = 0.26$ only under conditions specified in MAP	169 965–233 704, but catch higher than 225 786 only under conditions specified in MAP	256 700**	274 064
2021	Management plan	247 952 (range 181 567–316 833)	268 458**	284 890
2022	Management plan	291 745 (range 214 000–373 210)	295 300**	300 788 [^]
2023	Management plan	249 237 (range 183 749–317 905)	269 200**	265 900 [^]
2024	Management plan	241 604 (range 191 075–247 704)	245 200**	239 938 [^] [^]
2025	Management plan	164 947 (range 130 195 – 169 131)	183 700**	194 910 [^]
2026	Management plan	224 616 (range 176 056–230 518)	245 175**	
2027	Management plan	324 277 (range 253 819 – 332 885)		

Based on the information, the fishery fails Clause A3.2.

References

1. International Council for the Exploration of the Sea. (2026). Sprat (*Sprattus sprattus*) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. <https://doi.org/10.17895/ices.advice.30932426>

A3.3	A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).
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Outcome	<i>Pass</i>
Rationale The MAP requires that fishing opportunities are fixed in such a way that there is a less than 5% probability of the spawning stock biomass falling below B_{lim}. When scientific advice indicates that the spawning stock biomass of the stock is below B_{lim}, further remedial measures shall be taken to ensure rapid return of the stock to levels above the level capable of producing MSY. Those remedial measures may include suspending the targeted fishery for the stock and the adequate reduction of fishing opportunities¹. Based on the information, the fishery passes Clause A3.3.	
References 1. European Parliament and Council of the European Union. (2016). Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007. Official Journal of the European Union, L 191, 1–15. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R1139-20240710	

A4 Stock status

A4.1	A4.1 The stock is at or above the target reference point; OR IF NOT: the stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure; OR IF NOT: the stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.
Outcome	<i>Pass</i>
Rationale The most recent catch advice states that “spawning-stock size is above MSY $B_{trigger}$, B_{PA}, and B_{lim}”¹. Based on the information, the fishery passes Clause A4.1.	
References 1. International Council for the Exploration of the Sea. (2026). Sprat (<i>Sprattus sprattus</i>) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. https://doi.org/10.17895/ices.advice.30932426	

Herring (*Clupea harengus*), Central Baltic

A1 Data collection

A1.1	A1.1 Landings data are collected such that the fishery-wide removals of this species are known.
Outcome	<i>Pass</i>
Rationale Data is submitted by Denmark as ICES Member Country, to the WGBFAS. The CFP places a clear obligation on Member States to account for and land all catches unless specific exemptions apply. These reporting requirements are set out in the EU Fisheries Control System through the Fisheries Control Regulation (EC Regulation No. 1224/2009), which requires each vessel to record catch data (target species and bycatch) in logbooks and complete a landing declaration specifying all quantities of each species landed¹. This information must be transmitted to the competent authority of each Member State, which then provides the information to the European Commission. Herring catches within the Central Baltic excluding the Gulf of Riga between 1904 and 2025 are displayed in Figure 4. Total ICES catch of the stock in 2025 was 112,427 tonnes². Of the ICES catch, Russian Federation landings were not officially reported to ICES, but an estimate is included. Discards in this year were thought to be negligible. Species misreporting of herring and sprat in mixed catches continues to be an ongoing problem encountered by the WGBFAS. Pelagic stocks in the Baltic Proper (subdivisions 25–29, 32) are mainly taken in pelagic trawl fisheries, of which the majority take herring and sprat simultaneously³. According to the national data submitters, the mixing of pelagic species in the landings is variably taken care of before submitting input data. The extent to which species misreporting has occurred and is occurring is however not well known. Analysis of a questionnaire answered by all Baltic countries in 2012 revealed that misreporting is mainly an issue of the industrial trawl fishery targeting sprat-herring mix in nearshore waters³. The effects of misreporting have been partially quantified and included in the assessment during the 2023 benchmarking where possible⁴. An ISSG made an attempt to provide the benchmark with corrected time series of catch data, for which species misreporting had been corrected. It was concluded that the issue of misreporting could not be addressed adequately by all the countries in time for the benchmark and that the issue needs to be postponed. The effects of central Baltic herring and sprat misreporting on the assessment of both stocks were analysed in the framework of the WKBALPEL and showed a greater sensitivity of spawning stock biomass estimates than of fishing mortality estimates to misreporting⁴. Denmark and Sweden provided an alternative time series of catch data, of which the Danish time series was included in the benchmark assessment³. Since misreporting has only been partly included in the assessment, it still contributes to uncertainty in the assessment and advice. Consequently, at the time of the 2026 WGBFAS Report, no new information on unallocated catches was presented to the group. Denmark has a relatively small part (<3%) of the Central Baltic Herring EU quota with 10% for Baltic sprat⁴. Misreporting will be further addressed at the next benchmark	

assessment.

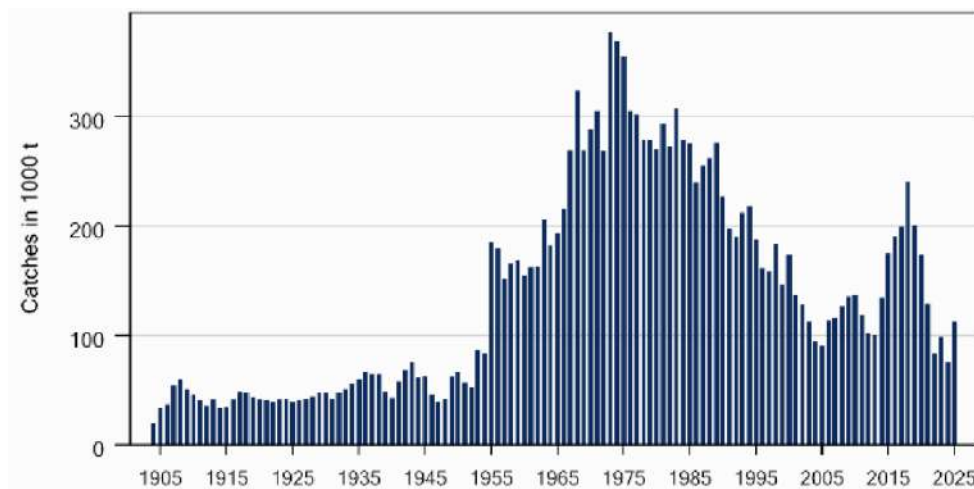


Figure 4. Herring catch in subdivisions 25–29 and 32, excluding the Gulf of Riga between 1904 and 2025².

Based on the above, the fishery passes Clause A1.1.

References

1. Council of the European Union. (2009). Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy. Official Journal of the European Union, L 343, 1–50. <https://eur-lex.europa.eu/eli/reg/2009/1224/oj/eng>
2. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, her.27.25-2932. <https://doi.org/10.17895/ices.advice.30932081>
3. International Council for the Exploration of the Sea. (2026). Baltic Fisheries Assessment Working Group (WGBFAS) 2026 Report. https://ices-library.figshare.com/articles/report/Baltic_Fisheries_Assessment_Working_Group_WGBFAS_2026_Report/32455056
4. International Council for the Exploration of the Sea. (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBALTPEL). ICES Scientific Reports, 5(47), 350 pp. <https://doi.org/10.17895/ices.pub.23216492>

A1.2	A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.
Outcome	<i>Pass</i>
Rationale The most recent ICES WGBFAS stock advice was produced in 2026, with the benchmarking completed in 2023 ¹ . The fishery is categorised as an ICES Category 1 fishery, meaning that	

assessments are quantitative and include stocks with full analytical assessments and forecasts that are either age-/length-structured or based on production models.

The input data used include commercial catches, one acoustic surveys (BIAS), natural mortality from the multispecies model (SMS) until 2021. Catches for the Russian Federation since 2022 are taken from the Russian Federation (2024–2026)².

No information on Russian Federation catches for 2022–2025 was officially reported to ICES¹. Therefore, the Russian Federation catches for these years included in the assessment were based on publicly available information, the quality of which cannot be quantified. In 2023, the 2022 catch by the Russian Federation included in the assessment was estimated based on information available on the AtlantNIRO website³. In 2024, the 2022 catch was corrected using data from the Russian Federal Fisheries Agency website⁴. Unlike in 2023, no additional estimates were needed. This same source was used to obtain the Russian Federation’s 2023 catches⁵. For 2025, data from the Russian Federal Fisheries Agency website were used again. Four reports (January to March 2025, January to June 2025, January to September 2025, and January to December 2025) were used to derive the spatial and quarterly catches⁵.

In 2026, more up to date and detailed information on the spatial and seasonal (quarterly) distribution of 2024 catches was found. As a result, the quarterly and spatial data for 2024 were corrected. On the Russian Federal Fisheries Agency website, catches are provided separately for the Gulf of Finland (SD 32) and the Baltic Proper (SD 26)⁵.

Russian catches of Central Baltic herring in 2025 account for around 21% of the total². No biological information on the composition of the Russian catches was available to ICES, and the impact this has on the quality of the assessment cannot be quantified.

Based on the above, the fishery passes Clause A1.2.

References

1. International Council for the Exploration of the Sea. (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBALPEL). ICES Scientific Reports, 5(47), 350 pp. <https://doi.org/10.17895/ices.pub.23216492>
2. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, her.27.25-2932. <https://doi.org/10.17895/ices.advice.30932081>
3. Russian Federal Research Institute of Fisheries and Oceanography. (n.d.). Russian Federal Research Institute of Fisheries and Oceanography (VNIRO). <https://vniro.ru/index.php/en/>
4. Federal Agency for Fishery. (n.d.). Federal Agency for Fishery. <https://fish.gov.ru/>
5. International Council for the Exploration of the Sea. (2026). Baltic Fisheries Assessment Working Group (WGBFAS) 2026 Report. https://ices-library.figshare.com/articles/report/Baltic_Fisheries_Assessment_Working_Group_WGBFAS_2026_Report/32455056

A2 Stock assessment

A2.1	A2.1 A stock assessment is conducted at least once every 3 years (or every 5 years if there is substantial supporting information that this is sufficient for the long-term sustainable management of the stock) and considers all fishery removals and the biological characteristics of the species.
Outcome	<i>Pass</i>
Rationale Herring in the Central Baltic Sea, excluding the Gulf of Riga is subject to an annual stock assessment carried out by the ICES WGBFAS as a Category 1 stock. The stock was benchmarked in 2023, and the outcomes were implemented in the last assessment published in 2026^{1,2}. The benchmarking process ensures that the stock assessment recognises the most recent available scientific understanding of the species, the stock, the fishery, and the ecosystems within which they occur. The stock assessment is conducted as a whole following the ICES methodology³. The data used for the stock assessment included landing and catch data from all countries exploiting the stock, as well as biological data such as age composition, mean weights at age, maturity at age, and natural mortality. Additionally, fishery-independent information from the BIAS and BASS surveys was also utilised². Based on the above, the fishery passes Clause A2.1.	
References 1. International Council for the Exploration of the Sea. (2023). <i>Benchmark Workshop on Baltic Pelagic stocks (WKBALPEL)</i>. ICES Scientific Reports, 5(47), 350 pp. https://doi.org/10.17895/ices.pub.23216492 2. International Council for the Exploration of the Sea. (2026). Herring (<i>Clupea harengus</i>) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In <i>Report of the ICES Advisory Committee, 2026</i>. ICES Advice 2026, her.27.25-2932. https://doi.org/10.17895/ices.advice.30932081 3. International Council for the Exploration of the Sea. (2023). <i>Guide to ICES advisory framework and principles</i>. In <i>Report of the ICES Advisory Committee, 2023</i>. https://doi.org/10.17895/ices.advice.22116890	

A2.2	A2.2 The assessment provides an estimate of the status of the biological stock relative to a reference point or proxy.
Outcome	<i>Pass</i>
Rationale The annual WGBFAS stock assessment provides an indication of the status of the stock relative to target and limit reference points (Table 4). These were most recently updated in 2023 with MSY	

$B_{trigger}$ (and MAP MSY $B_{trigger}$) set as $B_{30\%}$ and B_{lim} (and MAP B_{lim}) set at $0.15 \times B_0$ ¹.

The 2026 stock assessment projected that SSB in 2026 would be 105% of the target reference point level, and stated, “fishing pressure on the stock is below FMSY, and spawning-stock size is below MSY $B_{trigger}$ and between B_{pa} and B_{lim} .” as seen in (Figure 5)¹.

Table 4. Herring in subdivisions 25–29 and 32, excluding the Gulf of Riga. Reference points, values, and their technical basis¹.

Framework	Reference point	Value	Technical basis	Source
Maximum sustainable yield (MSY) approach	MSY $B_{trigger}$	$B_{30\%}$	Relative value. Set at 30% of B_0 . Determined through management strategy evaluation with the objective to achieve high sustainable yields without exceeding a 5% probability of spawning-stock biomass (SSB) falling below B_{lim} in any single year.	ICES (2023a)
	F_{MSY}	$F_{B30\%}$	Relative value. Set as the F which will achieve 30% of B_0 . Determined through management strategy evaluation with the objective to achieve high sustainable yields without exceeding a 5% probability of SSB falling below B_{lim} in any single year.	ICES (2023a)
Precautionary approach	B_{lim}	$0.15 \times B_0$	Relative value. Set at 15% of B_0 .	ICES (2023b)
	$B_{pa}=MSY B_{trigger}$	$B_{30\%}$	Relative value. Set at 30% of B_0 . Determined through management strategy evaluation with the objective to achieve high sustainable yields without exceeding a 5% probability of SSB falling below B_{lim} in any single year.	ICES (2023a)
	F_{pa}	$F_{B25\%}^{**} = F_{MSY} \times 1.21$	F_{POS} . Relative value. Determined through management strategy evaluation. The F that leads to SSB $\geq B_{lim}$ with 95% probability.	ICES (2023a)
Management plan	MAP MSY $B_{trigger}$	$B_{30\%}$	MSY $B_{trigger}$	ICES (2023a)
	MAP B_{lim}	$0.15 \times B_0$	B_{lim}	ICES (2023a)
	MAP F_{MSY}	$F_{B30\%}$	F_{MSY}	ICES (2023a)
	MAP range F_{lower}	$F_{B40\%} = F_{MSY} \times 0.75$	Relative value. Determined through management strategy evaluation, consistent with the ranges that result in no more than a 5% reduction in long-term yield compared to MSY.	ICES (2023a)
	MAP range F_{upper}	$F_{B25\%}^{**} = F_{MSY} \times 1.21$	Relative value. Determined through management strategy evaluation, consistent with the ranges that result in no more than a 5% reduction in long-term yield compared to MSY. Capped to F_{POS} .	ICES (2023a)

Relative Spawning Biomass

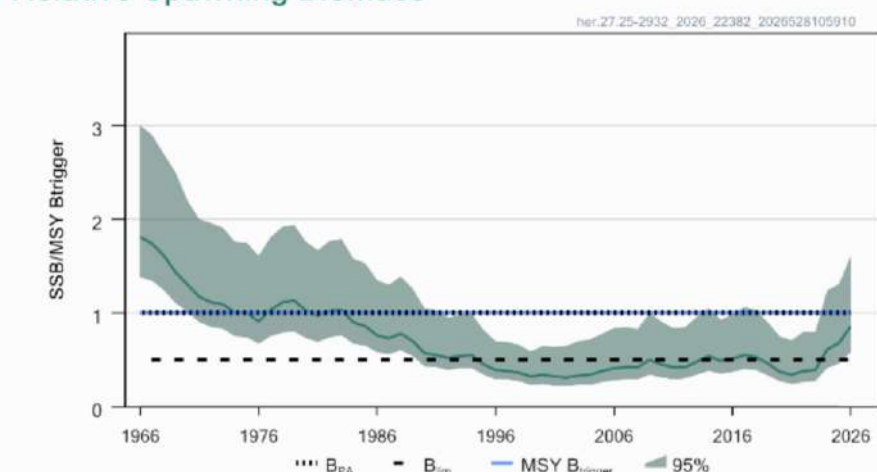


Figure 5. Herring SSB in subdivisions 25–29 and 32, excluding the Gulf of Riga relative to MSY $B_{trigger}$, B_{lim} and B_{pa} ¹.

Based on the above, the fishery passes Clause A2.2.

References

1. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In *Report of the ICES Advisory Committee, 2026*. ICES Advice 2026, her.27.25-2932.
<https://doi.org/10.17895/ices.advice.30932081>

A2.3

A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.

Outcome

Pass

Rationale

The ICES advice annually provides an indication of the volume of fishery removals that is appropriate for the current stock status in the form of recommended catches in the upcoming year.

The latest catch advice indicates that, when the MAP for the Baltic Sea is applied, the catches in 2027 that correspond to the F ranges in the plan are between 253,819 tonnes and 332,885 tonnes. According to the MAP, catches higher than those corresponding to F_{MSY} (324,277 tonnes) can only be taken under conditions specified in the plan, while the entire range is considered precautionary when applying the ICES advice rule¹.

Based on the above, the fishery passes Clause A2.3.

References

1. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In *Report of the ICES Advisory Committee, 2026*. ICES Advice 2026, her.27.25-2932.
<https://doi.org/10.17895/ices.advice.30932081>

A2.4

A2.4 The assessment is subject to internal or external peer review.

Outcome

Pass

Rationale

ICES Technical Guidelines outline a transparent review process for stock assessments, emphasising the importance of public availability of data and methodologies. This is exemplified by the ICES Transparent Assessment Framework, ensuring transparency of ICES advisory processes¹. It makes the data, methods, and results from ICES assessments easy to find, explore, and re-run. This allows stakeholders to examine the input data used in models, ensuring accountability and fostering trust in the assessment outcomes. The review process includes expert evaluations and opportunities for public comment.

When the results of the assessments are agreed upon by the ICES groups, they are sent to the ICES

Advice Drafting Group, which consists of National Experts who review them. They are finally reviewed by ACOM, which delivers the ICES advice. The ACOM advice is grounded in 10 principles to support ecosystem-based management advice (Figure 6). This ensures that the advice is based on the best available science and data, considered legitimate by both authorities and stakeholders, and relevant and operational to the policy or management challenge in question².

Specifically, Principle 7 states that “to ensure that the best available, credible science has been used and to confirm that the analysis provides a sound basis for advice, all analyses and methods are peer reviewed by at least two independent reviewers. For recurrent advice, the review is conducted through a benchmark process; for special requests through one-off reviews”². In the case of Central Baltic herring, the stock assessment was most recently subjected to a benchmarking process in 2023 and therefore is subject to peer review³.



Figure 6. ICES advice principles².

Based on the above, the fishery passes Clause A2.3.

References

1. International Council for the Exploration of the Sea. (n.d.). Transparent Assessment Framework (TAF). <https://www.ices.dk/data/assessment-tools/Pages/transparentassessment-framework.aspx>
2. International Council for the Exploration of the Sea. (2023). Guide to ICES advisory framework and principles. *In* Report of the ICES Advisory Committee, 2023. <https://doi.org/10.17895/ices.advice.22116890>
3. International Council for the Exploration of the Sea. (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBALPEL). ICES Scientific Reports, 5(47), 350 pp. <https://doi.org/10.17895/ices.pub.23216492>

A2.5	A2.5 The assessment is made publicly available.
Outcome	<i>Pass</i>

Rationale This assessment and all others can be found on the ICES website¹. Based on the information, the fishery passes Clause A2.5.
References 1. International Council for the Exploration of the Sea. (n.d.). ICES Library. https://iceslibrary.figshare.com

A3 Harvest strategy

A3.1	A3.1 There is a mechanism in place by which total fishing mortality of this species is restricted.
Outcome	<i>Pass</i>
Rationale Total fishing mortality for the species is restricted through the implementation of fishing quotas. Within EU waters, TACs are set annually, generally guided by ICES species advice, which in turn is based on the Baltic Sea MAP (Regulation (EU) 2016/1139)¹. Once the TAC is set, it is apportioned among Member States through national quotas. TACs for the fishery have been set within the range recommended by ICES since the implementation of the MAP in 2018. A mixture of Central Baltic herring (subdivisions 25–27, 28.2, 29, and 32) and Gulf of Riga herring (subdivision 28.1) is caught in the Central Baltic Sea. In the assessment and the advice, the Central Baltic herring stock is considered to be caught both inside and outside the Central Baltic Sea. The international TAC (the sum of the EU and Russian Federation autonomous quotas) is set for herring caught in the Central Baltic management area and also includes a small amount of Gulf of Riga herring caught in the Central Baltic Sea but excludes Central Baltic herring caught outside the Central Baltic Sea². Based on the information, the fishery passes Clause A3.1.	
References 1. Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007. https://eur-lex.europa.eu/legalcontent/en/TXT/?uri=CELEX:32016R1139 2. International Council for the Exploration of the Sea. (2026). Herring (<i>Clupea harengus</i>) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advisory Committee, 2026. ICES Advice 2026, her.27.25-2932.	

<https://doi.org/10.17895/ices.advice.30932081>

A3.2	A3.2 Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.
Outcome	Fail
Rationale Since 2018, ICES has provided a range of potential catch recommendations to reflect the specifics of the Baltic Sea MAP. Since the MAP's introduction, the total international quota (the sum of the EU TAC and the Russian autonomous quota) has generally been within the bounds of the ICES advice. However, while the ICES catch advice for 2024 called for maximum catches within the range of 41,706 to 52,549 tonnes, the total international TAC for the year was set at 67,368 tonnes, nearly 30% greater than the maximum recommended level (Table 5)¹. This was then exceeded again by the catches which reached 75,626 tonnes. An argument could be made that this excess TAC has only occurred in one year and therefore does not represent removals that “regularly exceed” the level stated in the stock assessment. However, the severity of the excess TAC in 2024 is exacerbated by the conclusion of the 2023 stock assessment that this quota was set at a time when stock biomass was below the limit reference point. Table 5. Herring in subdivisions 25–29 and 32, excluding the Gulf of Riga. ICES advice, TACs, and catches. All weights are in tonnes².	

Year	ICES advice	Catch corresponding to the advice	Agreed TAC	ICES catch SDs 25–29 and 32	ICES catch
2017	MSY approach ($F_{MSY} = 0.22$)	$\leq 216\,000$	220 629 ^{^^}		199 428
2018	Multianual plan (MAP) target F ranges: F_{lower} to F_{upper} (0.16–0.28), but F higher than $F_{MSY} = 0.22$ only under conditions specified in MAP	200 236–331 510 but catch higher than 267 745 only under conditions specified in MAP	258 855 ^{^^}		240 739
2019	MAP target F ranges: F_{lower} to F_{upper} (0.16–0.28), but F higher than $F_{MSY} = 0.22$ only under conditions specified in MAP	115 591–192 787 but catch higher than 155 333 only under conditions specified in MAP	200 260 ^{^^}		200 957
2020	MAP target F ranges: F_{lower} to F_{upper} (0.16–0.28), but F higher than $F_{MSY} = 0.22$ only under conditions specified in MAP	130 546–214 553 but catch higher than 173 975 only under conditions specified in MAP	182 484 ^{^^}		174 520
2021	Management plan	111 852 (range 83 971–138 183)	126 051 ^{^^}		128 961
2022	Management plan	71 939 (range 52 443–87 581)	80 753 ^{^^}		83 821 ^{^^^}
2023	Management plan	95 643 (range 70 130–95 643)	97 822 ^{^^}		98 696 ^{^^^}
2024	Management plan	52 549 (range 41 706–52 549)	67 368 ^{^^}		75 626 ^{^^^}
2025	Management plan	125 344 (range 95 340–125 344)	110 881 ^{^^}		112 427 ^{^^^}
2026	Management plan	157 996 (range 120 378–157 996)	123 463 ^{^^}		
2027	Management plan	274 322 (range 211 363–324 914)			

* 1988–2003 including Gulf of Riga herring.

** TAC for subdivisions 22–29S and 32.

*** TAC for subdivisions 25–28.2, 29, and 32.

[^] EU TAC for subdivisions 25–28.2, 29, and 32.

^{^^} TAC is calculated as EU (subdivisions 25–28.2, 29, and 32) + Russian Federation autonomous quotas.

^{^^^} Russian Federation landings were not officially reported to ICES, but an estimate is included.

Based on the information, the fishery fails Clause A3.2.

References

1. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advisory Committee, 2026. ICES Advice 2026, her.27.25-2932. <https://doi.org/10.17895/ices.advice.30932081>

A3.3	A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).
Outcome	<i>Fail</i>
Rationale	

The 2023 ICES advice stated that the stock was substantially below the limit reference point (LRP) and that the stock would likely remain under the LRP even with zero fishing in 2024¹. Additionally, the MAP requires fishing pressure to be set at a level that reduces the chance of SSB falling below the LRP to less than 5%. However, despite this, the ICES headline catch advice recommended a quota of between 41,706 and 52,549 tonnes¹.

Due to the state of the stock, in August 2023, the European Commission proposed the closure of the targeted Central Baltic herring fishery². However, this proposal was not implemented, and the 2024 TAC was eventually set at 40,368 tonnes³. The 2024 ICES advice indicates that, when combined with the Russian Federation autonomous quota, the total international TAC in 2024 was 67,368 tonnes and as previously stated, this was exceeded by the landings.

The agreed quota in 2025 and 2026 was within the bounds of the ICES advice⁴.

Based on the information, the fishery fails Clause A3.3.

References

1. International Council for the Exploration of the Sea. (2023). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea): Replacing advice provided in May 2023. In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, her.27.25-2932. <https://doi.org/10.17895/ices.advice.23310368>
2. European Commission. (2023, August 29). Commission proposes fishing opportunities for the Baltic Sea for 2024. https://ec.europa.eu/commission/presscorner/detail/en/ip_23_4287
3. International Council for the Exploration of the Sea. (2024). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, her.27.25-2932. <https://doi.org/10.17895/ices.advice.25019276>
4. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, her.27.25-2932. <https://doi.org/10.17895/ices.advice.30932081>

A4 Stock status

A4.1	A4.1 The stock is at or above the target reference point; OR IF NOT: the stock is above the limit reference point or proxy and there is evidence that a fall below the limit reference point would result in fishery closure; OR IF NOT: the stock is estimated to be below the limit reference point or proxy, but fishery removals are prohibited.
Outcome	<i>Fail</i>
Rationale As of 2026, the stock is currently estimated to be above the limit reference point (B_{lim}) but below	

the target reference points B_{pa} and $MSY B_{trigger}^1$.

Additionally, there is evidence to suggest that a fall below the limit reference point would not result in fishery closure, as was the case in 2023. The 2023 stock assessment concluded that stock biomass was below the limit reference point level². However, the fishery remained open in 2024, with a total international TAC of 67,368 tonnes, nearly 30% more than the maximum recommended by the ICES advice (52,549 tonnes)².

Based on the information, the fishery fails Clause A4.1.

References

1. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). *In* Report of the ICES Advisory Committee, 2026. ICES Advice 2026, her.27.25-2932. <https://doi.org/10.17895/ices.advice.30932081>
2. International Council for the Exploration of the Sea. (2023). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea): Replacing advice provided in May 2023. *In* Report of the ICES Advisory Committee, 2023. ICES Advice 2023, her.27.25-2932. <https://doi.org/10.17895/ices.advice.23310368>

Category B species

Category B species are assessed using a risk-based approach.

- 2.2. The risk matrix in Table B(a) shall be used when assessing a Category B species when estimates of Fishing mortality (F), Biomass (B) and reference points are available.
- 2.3. The risk matrix in Table B(b) shall be used when assessing a Category B species when no reference points are available.

Sprat (*Sprattus sprattus*)

B1	A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).
Table used B(a) or B(b)	B(a)
Outcome	Pass
Rationale Baltic Sea sprat is managed relative to established target and limit reference points but fails in the Category A assessment under Clause A3.2. As discussed in this section, the actual fishery removals exceeded the quantity of removals recommended by ICES by more than 10% on two occasions; 2020 and 2025.	

In line with MarinTrust Whole Fish Fishery Assessment Criteria, if a species fails any of the Category A clauses, it should be re-assessed as a Category B species hence sprat is subsequently consideration as a Category B species. As information about biomass, fishing mortality, and reference points is available, Table B(a) was used. In the last Baltic Sea sprat stock assessment, it was determined that fishing pressure on the stock is at F_{MSY} and below F_{PA} , and spawning stock biomass is above $MSY B_{trigger}$, B_{PA} , and B_{lim} (Figures 2 and 7)¹.

Taking into account current estimates of biomass and fishing mortality relative to reference points, and applying Table B(a), the outcome is that the stock passes the Category B assessment (Table 6).

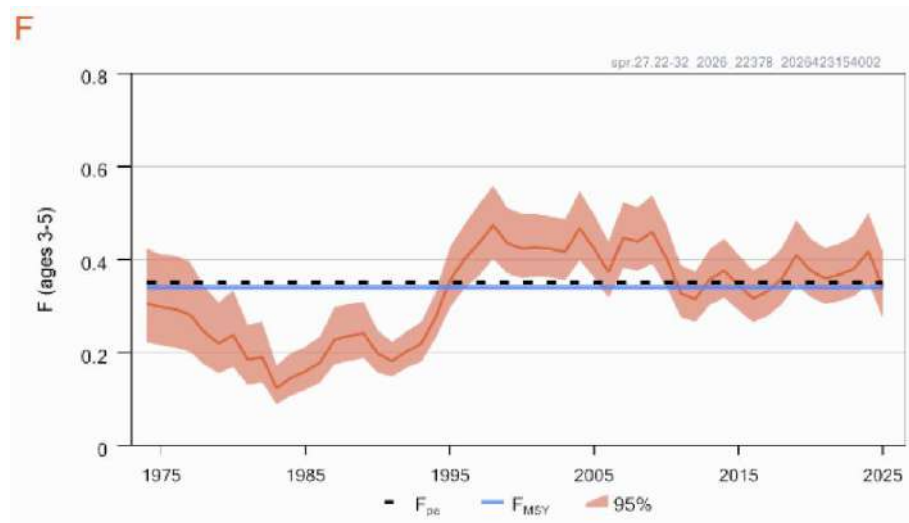


Figure 7. Baltic Sea sprat, relative fishing pressure¹.

Table 6. MarinTrust Whole Fish Fishery Assessment Criteria Table B(a) risk matrix. Results for sprat seen in red.

	Fishery removals are prohibited	Fishing mortality is below MSY or target reference point	Fishing mortality is around MSY or target reference point, or below the long-term average	Fishing mortality is above the MSY or target reference point, or around the long-term average	Fishing mortality is above the limit reference point or above the long-term average (stock is subject to overfishing)
Biomass is above MSY / target reference point	Pass	Pass	Pass	Fail	Fail
Biomass is below MSY / target reference point, but above limit reference point	Pass, but re-assess when fishery removals resume	Pass	Fail	Fail	Fail
Biomass is below limit reference point (stock is overfished)	Pass, but re-assess when fishery removals resume	Fail	Fail	Fail	Fail
Biomass is significantly below limit reference point (recruitment impaired)	Fail	Fail	Fail	Fail	Fail

Based on the information, the fishery passes Clause B1 against the B(a) Table.

References

1. International Council for the Exploration of the Sea. (2026). Sprat (*Sprattus sprattus*) in subdivisions 22–32 (Baltic Sea). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, spr.27.22-32. <https://doi.org/10.17895/ices.advice.30932426>

Herring (*Clupea harengus*), Central Baltic Sea

B1	A3.3 Commercial fishery removals are prohibited when the stock has been estimated to be below the limit reference point or proxy (small quotas for research or non-target catch of the species in other fisheries are permissible).
Table used B(a) or B(b)	B(a)
Outcome	Pass
Rationale	
Central Baltic herring is managed relative to established target and limit reference points but fails	

the Category A assessment under Clauses A3.2, A3.3 and A4.1. As discussed in these sections, the failure of these sections is due to total fishery removals exceeding the level indicated on the stock assessment, which in this case was by nearly 30% in 2024 (A3.2), the failure to prohibit fishery removals when the stock has been estimated to be below the LRP, as was the case in 2024 (A3.3) and with the stock currently below the target reference point but above the LRP, a lack of evidence that a fall below LRP would result in a fishery closure, as was the case in 2024 (A4.1).

In line with MarinTrust Whole Fish Fishery Assessment Criteria, if a species fails any of the Category A clauses, it should be re-assessed as a Category B species hence herring is subsequently consideration as a Category B species. As information about biomass, fishing mortality, and reference points is available, Table B(a) was used. In the last Central Baltic herring stock assessment, it was determined that fishing pressure on the stock is below F_{MSY} , and spawning-stock size is below $MSY B_{trigger}$ and between B_{PA} and B_{lim} (Figures 5 and 8)¹.

Taking into account current estimates of biomass and fishing mortality relative to reference points, and applying Table B(a), the outcome is that the stock passes the Category B assessment (Table 7).

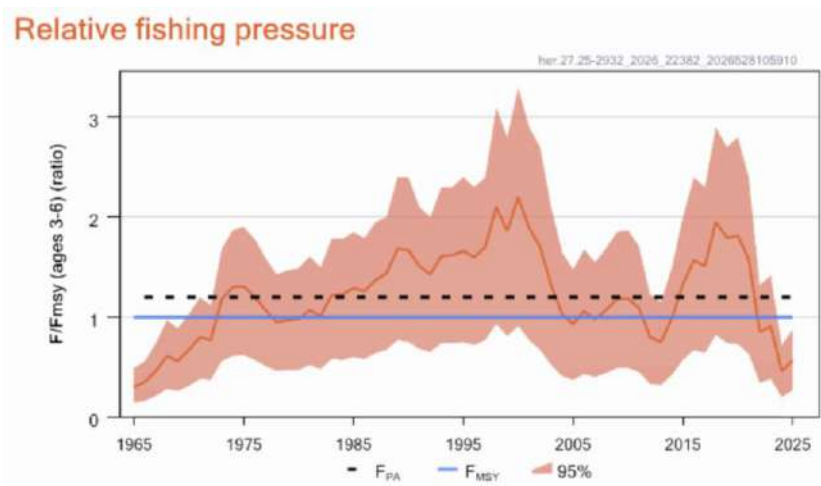


Figure 8. Central Baltic herring, relative fishing pressure¹.

Table 7. MarinTrust Whole Fish Fishery Assessment Criteria Table B(a) risk matrix. Results for Central Baltic Sea herring seen in red.

	Fishery removals are prohibited	Fishing mortality is below MSY or target reference point	Fishing mortality is around MSY or target reference point, or below the long-term average	Fishing mortality is above the MSY or target reference point, or around the long-term average	Fishing mortality is above the limit reference point or above the long-term average (stock is subject to overfishing)
Biomass is above MSY / target reference point	Pass	Pass	Pass	Fail	Fail
Biomass is below MSY / target reference point, but above limit reference point	Pass, but re-assess when fishery removals resume	Pass	Fail	Fail	Fail
Biomass is below limit reference point (stock is overfished)	Pass, but re-assess when fishery removals resume	Fail	Fail	Fail	Fail
Biomass is significantly below limit reference point (recruitment impaired)	Fail	Fail	Fail	Fail	Fail

Based on the information, the fishery passes Clause B1 against the B(a) Table.

References

1. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). In *Report of the ICES Advisory Committee, 2026*. ICES Advice 2026, her.27.25-2932.
<https://doi.org/10.17895/ices.advice.30932081>

Category C species

- 2.4. All clauses must be met for a species to pass the Category C assessment.
 - 2.4.1. Where a species fails this Category C clause, it should be assessed as a Category D species instead, except if there is evidence that the species is currently below the limit reference point.

Herring (*Clupea harengus*), Gulf of Riga

C1.1	C1.1 Fishery removals of the species in the fishery under assessment are included in the stock assessment process OR are considered by scientific authorities to be negligible.
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Outcome	Pass
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Rationale

Data is submitted by ICES Member Countries, to the WGBFAS. The CFP places a clear obligation on Member States to account for and land all catches unless specific exemptions apply.

The most recent ICES WGBFAS stock advice was produced in 2026, with the benchmarking completed in 2023¹. The fishery is categorised as an ICES Category 1 fishery, meaning that assessments are quantitative and include stocks with full analytical assessments and forecasts that are either age-/length-structured or based on production models.

The input data used include commercial catches, one acoustic survey index, a fixed maturity ogive for the years 1977 to 1994, a time-varying maturity ogive from commercial catches from 1995 onwards, and natural mortality is assumed to be constant¹.

Herring catches within the Gulf of Riga between 1977 and 2025 are shown in Figure 9. The total catch of the stock in 2025 was 35,987 tonnes, while the total herring catch in the Gulf of Riga management area was 42,196 tonnes¹.

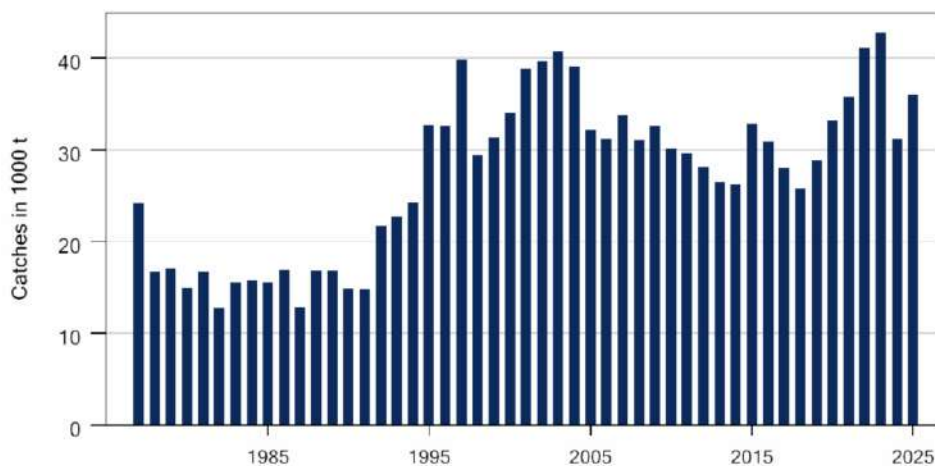


Figure 9. Herring catches in the Gulf of Riga (ICES subdivision 28.1) between 1977 and 2025¹.

Based on the information, the fishery passes Clause C1.1.

References

1. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in Subdivision 28.1 (Gulf of Riga). In Report of the ICES Advisory Committee, 2025 (ICES Advice 2025, her.27.28). https://ices-library.figshare.com/articles/report/Herring_i_Clupea_harengus_i_in_Subdivision_28_1_Gulf_of_Riga_/30932084?file=65083623

C1.2

C1.2 The species is considered, in its most recent stock assessment, to have a biomass above the limit reference point (or proxy), OR removals by the fishery under assessment are considered by scientific authorities to be

	negligible.
Outcome	<i>Pass</i>

Rationale

The annual WGBFAS stock assessment provides an indication of the status of the stock relative to target and limit reference points (Table 8). These were most recently updated in 2023 with MSY $B_{trigger}$ (and MAP MSY $B_{trigger}$) set as 72,907 tonnes and B_{lim} (and MAP B_{lim}) set at 52,076 tonnes¹.

The 2026 catch advice estimates SSB to be 136,763 tonnes meaning that spawning stock size is above MSY $B_{trigger}$, B_{PA} , and B_{lim} (Figure 10)¹. Additionally fishing pressure on the stock is below F_{MSY} .

Table 8. Herring in Subdivision 28.1 (Gulf of Riga). Reference points, values, and their technical basis. Weights in tonnes¹.

Framework	Reference point	Value	Technical basis	Source
Maximum sustainable yield (MSY) approach	MSY $B_{trigger}$	72 907	B_{PA}	ICES (2023)
	F_{MSY}	0.28	Stochastic simulations (EqSim) with segmented regression with fixed breakpoint at B_{PA} stock-recruitment model from the full time-series (1977–2021)	ICES (2023)
Precautionary approach	B_{lim}	52 076	$B_{lim} = B_{PA}/1.4$	ICES (2023)
	B_{PA}	72 907	Average spawning-stock biomass (SSB) based on SSB–recruitment pairs where $SSB \leq$ median SSB and recruitment $\geq$ median recruitment	ICES (2023)
	F_{PA}	0.35	F_{P05} ; the F that leads to $SSB \geq B_{lim}$ with 95% probability	ICES (2023)
Management plan	MAP MSY $B_{trigger}$	72 907	MSY $B_{trigger}$	ICES (2023)
	MAP B_{lim}	52 076	B_{lim}	ICES (2023)
	MAP F_{MSY}	0.28	F_{MSY}	ICES (2023)
	MAP range F_{lower}	0.21–0.28	Consistent with the ranges resulting in no more than 5% reduction in long-term yield compared with MSY	ICES (2023)
	MAP range F_{upper}	0.28–0.33	Consistent with the ranges resulting in no more than 5% reduction in long-term yield compared with MSY	ICES (2023)

SSB

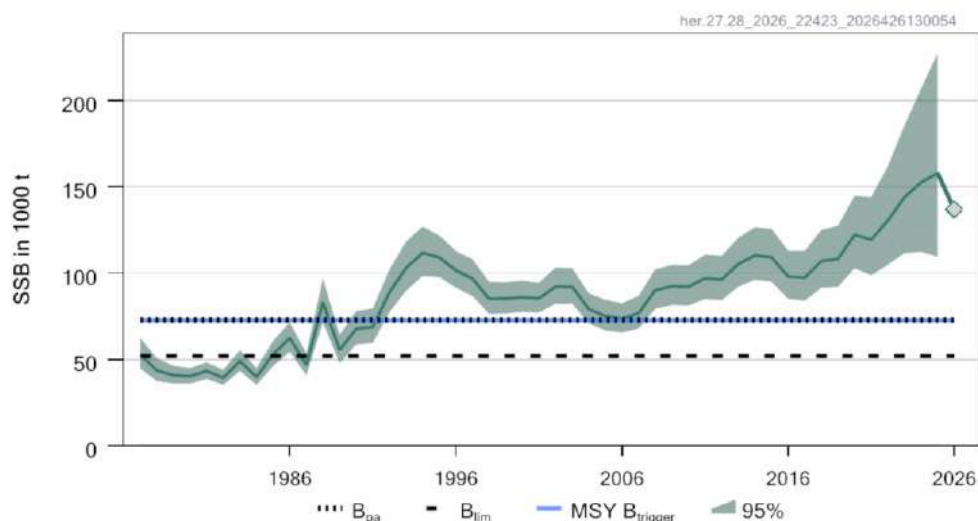


Figure 10. Herring SSB in Subdivision 28.1 (Gulf of Riga) relative to MSY $B_{trigger}$, B_{lim} and B_{pa} . SSB at spawning time in 2026 is predicted and is shown with a grey diamond¹.

Based on the above, the fishery passes Clause C1.2.

References

1. International Council for the Exploration of the Sea. (2026). Herring (*Clupea harengus*) in Subdivision 28.1 (Gulf of Riga). In Report of the ICES Advisory Committee, 2025 (ICES Advice 2025, her.27.28). https://ices-library.figshare.com/articles/report/Herring_i_Clupea_harengus_i_in_Subdivision_28_1_Gulf_of_Riga_/30932084?file=65083623

Category D species

Category D species are assessed against a risk-based approach.

- 2.5. The Productivity-Susceptibility Analysis (PSA) in Table D(a) shall be used when assessing Category D species.
- 2.6. Table D(b) shall be used to calculate the overall PSA risk rating for the Category D species.
- 2.7. Should the PSA indicate a high risk, further assessment shall be completed against the requirements in Table D(C).

Productivity Susceptibility Analysis (PSA) and scores

Table D(a) provides detailed values and scores for the species productivity and susceptibility attributes and attributes, the assessor shall use Table D(a) to the PSA table.

Table D(b) is used to calculate the overall PSA risk rating for the Category D species.

Species name	Three-spined stickleback (<i>Gasterosteus aculeatus</i>)	
Productivity attributes	Value	Score
Average age at maturity	1.6 years ¹	1
Average maximum age	8 years ¹	1
Fecundity	Range of 50 to 1,300 eggs. The average of the reported range midpoints was approximately 350 eggs ¹ .	2
Average maximum size	11 cm ¹	1
Average size at maturity	5.5 cm ¹	1
Reproductive strategy	Demersal egg layer ¹	2
Mean Trophic Level (MTL)	3.3 ¹	3
Density dependence	N/A	/

(to be used when scoring invertebrate species only)		
Susceptibility attributes		
Areal overlap (availability): Overlap of the fishing effort with a species concentration of the stock	<10% overlap. Three-spined stickleback are found in Circumarctic and temperate regions. Extending south to the Black Sea, southern Italy, Iberian Peninsula, North Africa; in Eastern Asia north of Japan (35°N), in North America north of 30-32°N; Greenland ¹ . This significantly exceeds the extent of the fishery.	1
Encounterability: The position of the stock/ species within the water column relative to the fishing gear, and the position of the stock/species within the habitat relative to the position of the gear	Low overlap with fishing gear (low encounterability). Three-spined stickleback are found down to 100m while herring are between 0 and 364m ^{1,2} . However, the fishery primarily operates within 6 and 54m range with very little fishing below 20m but considering the bycatch of the species is at 0.3% this suggests low realised overlap ^{3,4} .	1
Selectivity of gear type: Potential of the gear to retain species	Retained	3
Post-capture mortality (PCM): The chance that, if captured, a species would be released and that it would be in a condition permitting subsequent survival	Precautionary (no information found)	3
Average productivity score		1.57
Average susceptibility score		2
PSA risk rating (from Table D(b))		Pass
Compliance rating		Pass

1. Froese, R., & Pauly, D. (Eds.). (n.d.). *Gasterosteus aculeatus* (Linnaeus, 1758). FishBase. https://www.fishbase.se/summary/Gasterosteus_aculeatus.html
2. Froese, R., & Pauly, D. (Eds.). (n.d.). *Clupea harengus* (Linnaeus, 1758). FishBase. <https://www.fishbase.se/summary/Clupea-harengus.html>
3. Casini, M., Hjelm, J., Molinero, J. C., Lövgren, J., Cardinale, M., Bartolino, V., Belgrano, A., & Kornilovs, G. (2010). Trophic cascades promote threshold-like shifts in pelagic marine ecosystems. *ICES Journal of Marine Science*, 67(9), 1915–1922. <https://doi.org/10.1093/icesjms/fsq090>

4. FishSec. (2023). Gulf of Riga herring: The only healthy Baltic herring stock? FishSec.
<https://www.fishsec.org/2023/11/16/gulf-of-riga-herring-the-only-healthy-baltic-herring-stock/>

Further assessment for Category D species

Should the PSA indicate a high risk, further assessment shall be completed against the requirements D1 and D2 – Table D(c).

D1	D1. The potential impacts of the fishery on this species are considered during the management process, and reasonable measures are taken to minimise these impacts.
Outcome	Choose an item.
Rationale	
References	

D2	D2. There is no substantial evidence that the fishery has a significant negative impact on the species.
Outcome	Choose an item.
Rationale	
References	

Ecosystem requirements

This section, or module, assesses the impacts that the fishery under assessment may have on key ecosystem components: ETP species, habitat and the wider ecosystem.

- 3.1. All ecosystem criteria must be met (pass) for a fishery to pass the Ecosystem Requirements.
 - 3.1.1. The sub-criteria offer a structured evidence base to demonstrate that the fishery sufficiently meets the ecosystem criteria, it is not expected that sub-criteria are assessed independently of the main criterion.

E1 Impact on Endangered, Threatened or Protected species (ETP species)

E1.1	E1.1 Information on interactions between the fishery and ETP species is collected. <i>In reaching a determination for E1.1, the assessor should consider if the following is in place:</i>
	E1.1.1 ETP species which may be directly affected by the fishery have been identified.
	E1.1.2 Interactions between the fishery and ETP species are recorded and reported to management organisations.
	E1.1.3 Collection and analysis of ETP information is adequate to provide a reliable indication of the impact the fishery has on ETP species.
Outcome	<i>Pass</i>
Rationale ICES requires that, in line with the ICES data call specifications, Member Countries submit complete fishing effort and monitoring effort data for all métiers, even when no bycatch has been reported. ICES recommends that Member Countries use at-sea observers and electronic monitoring protocols, corresponding to systems with appropriately placed cameras and suitable species identification methods, for the collection of robust and reliable bycatch data. This data is most commonly linked to at-sea observations carried out for the purposes of fisheries monitoring in accordance with the EU Data Collection Framework Regulation 2017/1004 (DCF)¹. The Working Group on Bycatch of Protected Species (WGBYC) was established in 2007 by ICES to cover the Northeast Atlantic and adjacent sea areas (Baltic, Mediterranean, and Black Seas). The working group collates and assesses information on bycatch monitoring and assessment for ETP species, including mammals, birds, turtles, and rare fish². Through the 2024 data call, 23 countries out of 25 responded and submitted data on fishing and monitoring effort, and 22 submitted data on bycatch observations for 2023. Denmark has been participating in data submissions to ICES WGBYC regarding fishing effort, observer effort, and bycatch records since 2019³. Additionally, at the time of writing, the Baltic herring and sprat fishery has withdrawn its MSC certification, as the fishery is now covered by the FFA Finland and SPFPO Sweden Gulf of Bothnia herring fishery certificate^{4,5}. However, in the third surveillance report published in August 2024, no interactions within the Danish pelagic fleet and ETP species were recorded⁴. The Gulf of Riga herring fishery is also MSC certified⁶. Based on the information, the fishery passes Clause E1.1.	
References 1. International Council for the Exploration of the Sea. (2023). Bycatch of endangered, threatened and protected species of marine mammals, seabirds and marine turtles, and selected fish species of bycatch relevance. https://ices-	

library.figshare.com/articles/report/Bycatch_of_endangered_threatened_and_protected_species_of_marine_mammals_seabirds_and_marine_turtles_and_selected_fish_species_of_bycatch_relevance/27999401

2. International Council for the Exploration of the Sea. (n.d.). Working Group on Bycatch of Protected Species (WGBYC). <https://www.ices.dk/community/groups/Pages/WGbyc.aspx>
3. International Council for the Exploration of the Sea. (2024). Working Group on Bycatch of Protected Species (WGBYC). ICES Scientific Reports, 6(102), 354 pp. <https://doi.org/10.17895/ices.pub.27762723>
4. Marine Stewardship Council. (n.d.). Denmark, Estonia, Germany, Sweden Baltic herring and sprat. MSC Fisheries Assessments. <https://fisheries.msc.org/en/fisheries/denmark-estonia-germany-sweden-baltic-herring-and-sprat/@assessments>
5. Marine Stewardship Council. (n.d.). FFA Finland and SPFPO Sweden Gulf of Bothnia herring fishery. MSC Fisheries Assessments. <https://fisheries.msc.org/en/fisheries/ffa-finland-and-spfpo-sweden-gulf-of-bothnia-herring-fishery/@assessments>
6. Marine Stewardship Council. (2026). NZRO Gulf of Riga herring trawl fishery. Final Draft Report. <https://fisheries.msc.org/en/fisheries/nzro-gulf-of-riga-herring-trawl/@assessments>

E1.2	E1.2 The fishery has no significant negative impact on ETP species.
	<i>In reaching a determination for E1.2, the assessor should consider if the following is in place:</i>
	E1.2.1 The information collected in relation to E1.1.3 indicates that the fishery does not have a significant negative impact on ETP species.
Outcome	<i>Pass</i>

Rationale

In the Baltic Sea ecoregion in 2025, 321 marine mammals from 9 species, 899 birds from 28 species, 3 elasmobranchs from 3 species, 68,015 teleost from 9 species, 4 chondrosteans from 2 species, and 163 lamprey from a single species were recorded¹. Of the most recent WGBYC reported Baltic Sea bycatch species across all fisheries, five meet the MarinTrust ETP species definition (Table 9).

Table 9. WGBYC bycatch species for the Baltic Sea².

Species	Common name	Total specimens	IUCN Category	CITES Appendix
<i>Acipenser oxyrinchus</i>	Atlantic sturgeon	3	Vulnerable	II
<i>Acipenser sturio</i>	European sea sturgeon	1	Critically Endangered	I
<i>Lutra lutra</i>	Eurasian otter	3	Near Threatened	I
<i>Anguilla anguilla</i>	European eel	701	Critically Endangered	II
<i>Phocoena Phocoena</i>	Harbour porpoise	48	Critically Endangered (Baltic Sea subpopulation)	/

The low probability of ETP interactions is evident in the third MSC surveillance audit report for the fishery, as there are no recorded interactions with ETP species³. The report notes specific concern regarding the fishery effecting the Baltic Sea subpopulation of the harbour porpoise (*Phocoena phocoena*) which is listed as Critically Endangered by the IUCN⁴. However, data on bycatch of this

species since 2018 indicates that interaction rates are low with no Danish fishing vessels recording any interactions (Table 10)¹. Denmark is committed to the monitoring and mitigation of ETP species bycatch. It reported five projects to the WGFTFB: Trawlvision, "Observing and quantifying fish behaviour in relation to active fishing gear" project, The BeFish Network project, The Hydrolift project and the EveryFish project¹.

Table 10. Reported bycatches of harbour porpoise from fishing vessel logbooks at the national level, collated from by the client group¹.

Year	Nation						
	Latvia	Finland	Denmark	Sweden	Germany*	Estonia	Poland
2023							
2022	0	0	0	0	3	0	0
2021	0	0	0	0	2	0	0
2020	0	0	0	0	1	0	0
2019	0	0	0	0	1	0	0
2018	0	1	0	0	1	0	1

Based on the information, the fishery passes Clause E1.2.

References

1. International Council for the Exploration of the Sea. (2024). Working Group on Bycatch of Protected Species (WGBYC). ICES Scientific Reports, 6(103), 237 pp. <https://doi.org/10.17895/ices.pub.27762723>
2. International Council for the Exploration of the Sea. (2025). TOR A long table bycatch only [Data set]. GitHub. https://github.com/ices-eg/wg_WGBYC/tree/master/2025
3. Marine Stewardship Council. (2024). Denmark, Estonia, Germany, Sweden Baltic herring and sprat. Surveillance report. <https://fisheries.msc.org/en/fisheries/denmark-estonia-germany-sweden-baltic-herring-and-sprat/@assessments>
4. Carlström, J., Carlén, I., Dähne, M., Hammond, P.S., Koschinski, S., Owen, K., Sveegaard, S. & Tiedemann, R. (2023). Phocoena phocoena (Baltic Sea subpopulation). The IUCN Red List of Threatened Species 2023: e.T17031A50370773. <https://www.iucnredlist.org/species/17031/50370773>

E1.3	E1.3 There is an ETP management strategy in place for the fishery.
	<i>In reaching a determination for E1.3, the assessor should consider if the following is in place:</i>
	E1.3.1 There are measures applied to the fishery which are designed to manage the impacts of the fishery on ETP species. E1.3.2 The measures are considered likely to achieve the objectives of regional, national and international legislation relating to ETP species.
Outcome	<i>Pass</i>

Rationale

The management of ETP species is prevalent in the objectives of European fisheries policy. Objective 3 of the EU Common Fisheries Policy (EU 1380/2013) is to ensure that negative impacts of fishing activities on the marine ecosystem are minimised¹. This includes avoiding and reducing unwanted catches of commercial and protected species.

An assessment of ETP species mortality as a result of bycatch is required to fulfil the objectives of the EU Marine Strategy Framework Directive (MSFD, 2008/56/EC)². Specifically, Descriptor 1, which states that biological diversity is maintained, should include species (birds, mammals, reptiles, and non-commercially exploited species of fish and cephalopods) which are regionally at risk from incidental bycatch.

ETP management is also featured in EU Regulation 2019/1241 on the conservation of fisheries resources and the protection of marine ecosystems through technical measures. Here, the objective states that it aims to "ensure that incidental catches of sensitive marine species, including those listed under directives 1992/43/EC and 2009/47/EC that are a result of fishing, are minimised and where possible eliminated so that they do not represent a threat to the conservation status of these species"⁴.

Further, the reduction of the impact of fisheries on sensitive species is one of the objectives of the European Commission-adopted 2023 Action Plan "Protecting and restoring marine ecosystems for sustainable and resilient fisheries". It requires that threshold values for the maximum allowable mortality rate for incidental catches of selected species are developed and implemented in fisheries management measures⁵.

Based on the information, the fishery passes Clause E1.3.

References

1. European Parliament and Council of the European Union. (2013). Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC. Official Journal of the European Union, L 354, 22–61. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32013R1380>
2. European Parliament and Council of the European Union. (2008). Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive). Official Journal of the European Union, L 164, 19–40. <https://eurlex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32008L0056>
3. European Commission. (n.d.). Descriptors under the Marine Strategy Framework Directive. https://environment.ec.europa.eu/topics/marine-environment/descriptors-under-marinestrategy-framework-directive_en
4. Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007. <https://eur->

[lex.europa.eu/legalcontent/en/TXT/?uri=CELEX:32016R1139](https://eur-lex.europa.eu/legalcontent/en/TXT/?uri=CELEX:32016R1139)

5. European Commission. (2023). EU Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries (COM(2023) 102 final). <https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX%3A52023DC0102>

E2 Impact on the habitat

E2.1	E2.1 Information on interactions between the fishery and marine habitats is collected. <i>In reaching a determination for E2.1, the assessor should consider if the following is in place:</i>
	E2.1.1 Habitats which may be directly affected by the fishery have been identified, including any habitats which may be particularly vulnerable.
	E2.1.2 Information on the scale, location and intensity of fishing activity relative to habitats is collected.
	E2.1.3 Collection and analysis of habitat information is adequate to provide a reliable indication of the impact the fishery has on marine habitats.
Outcome	<i>Pass</i>
Rationale The herring and sprat fishery is a pelagic trawl fishery that operates in the midwater column¹. By design, this gear does not come into contact with the seabed; as such, it is not considered to impact marine habitats. Given the extensive body of evidence supporting this across all pelagic trawls, it is highly unlikely that the fishery is different in this regard. However, for fisheries in the region that interact with seabed habitats, measures are in place to manage and mitigate impacts through mechanisms such as the HELCOM Baltic Sea Action Plan (BSAP), the requirements associated with Natura 2000 sites, and the technical measures outlined in EU regulations². Based on the information, the fishery passes Clause E2.1.	
References 1. Seafish. (n.d.). Pelagic pair trawl. Fishing Gear Database. https://www.seafish.org/responsible-sourcing/fishing-gear-database/gear/pelagic-pair-trawl/ 2. Baltic Marine Environment Protection Commission (HELCOM). (2021). Baltic Sea Action Plan. https://helcom.fi/baltic-sea-action-plan/	

E2.2	E2.2 The fishery has no significant impact on marine habitats. <i>In reaching a determination for E2.2, the assessor should consider if the following is in place:</i>
	E2.2.1 The information collected in relation to E2.1.3 indicates that the fishery does not have a significant negative impact on marine habitats.
Outcome	Pass
Rationale The fishery uses pelagic trawls, which are designed to operate in the water column and not impact the marine habitat, and there is no evidence to suggest otherwise. Based on the information, the fishery passes Clause E2.2.	
References	

E2.3	E2.3 There is a habitat management strategy in place for the fishery. <i>In reaching a determination for E2.3, the assessor should consider if the following is in place:</i>
	E2.3.1 There are measures applied to the fishery which are designed to manage the impact of the fishery on marine habitats.
	E2.3.2 The measures are considered likely to prevent the fishery from having a significant negative impact on marine habitats.
Outcome	Pass
Rationale Considering that pelagic trawl fisheries are not in contact with the seabed and therefore do not impact the marine habitat, a specific habitat management strategy is not considered necessary. Based on the information, the fishery passes Clause E2.3.	
References	

E3 Impact on the ecosystem

E3.1	E3.1 Information on the potential impacts of the fishery on marine ecosystems is collected. <i>In reaching a determination for E3.1, the assessor should consider if the following is in place:</i>
	E3.1.1 The main elements of the marine ecosystems in the area(s) where the fishery takes place have been identified.
	E3.1.2 The role of the species caught in the fishery within the marine ecosystem is understood, either through research on this specific fishery or inferred from other fisheries.
	E3.1.3 Collection and analysis of ecosystem information is adequate to provide a reliable indication of the impact the fishery has on marine ecosystems.
Outcome	Pass
Rationale The fishery is assessed against an MSY-based management approach to ensure, among other things, that the stock continues to provide ecosystem services. This is underpinned by annual ICES stock assessments and scientific advice, ensuring that the management is robust and based on up-to-date data. Data for these assessments are provided annually by Member Countries through ICES data calls. Fisheries observer programmes contribute additional data on the fishery's ecosystem impacts. Together, these data sources support the development of management advice designed to minimise negative impacts on the marine ecosystem. Additionally, commercial fisheries in the Baltic Sea are managed according to a MAP (EU Regulation 2016/1139)¹. The objectives of the MAP include implementing the ecosystem-based approach to fisheries management, the precautionary approach, and EU legislation, including the MSFD, Directive 2008/56/EC. Article 3, Clause 3 of the MAP states, “The plan shall implement the ecosystem-based approach to fisheries management in order to ensure that negative impacts of fishing activities on the marine ecosystem are minimised”. Article 8 empowers the European Commission to adopt technical measures to “minimise the negative impact of fishing gears and fishing activities on the ecosystem”¹. ICES conducts Ecosystem Overviews, which utilise risk-based methods to identify the primary human pressures and explain how these pressures affect key ecosystem components in each ICES ecoregion. These overviews provide information on trends in the ecosystem over recent years and play a crucial role in providing the context for ecosystem-based management². The most recent Workshop for the Revision of the Ecosystem Overview of the Baltic Sea Ecoregion (WKBALEO) was carried out in 2024, where experts worked to synthesise the knowledge that underpins the revision of the ICES Baltic Sea Ecosystem Overview, aiming to determine the main human activity sectors that cause pressures impacting the ecosystem components³. WKBALEO experts have evaluated the links between sectors, pressures, and ecosystem components using a linkage framework and pressure assessment process that examines and scores all direct pressures and human activities for the Baltic Sea ecoregion, following the ICES technical guidelines methodology and using the most up-to-date scientific knowledge³.	

Herring and sprat are key forage fish in the Baltic Sea, transferring energy from zooplankton to higher predators such as cod, seabirds, and marine mammals. Since both species are zooplanktivores, their population fluctuations influence zooplankton abundance, which in turn affects phytoplankton blooms and overall ecosystem health by exerting stronger zooplankton grazing pressure and potentially enhancing eutrophication through trophic cascades. Additionally, variations in sprat stocks have been linked to changes in the fledgling mass of common guillemots (seabirds)^{4,5}.

The specific roles of herring and sprat in the Baltic Sea ecosystem are taken into account in the development of the stock assessment process. This is apparent in the objectives of the 2023 benchmarking workshop that stated “as part of the assessment methods workshop, knowledge about environmental drivers, including multispecies interactions, and ecosystem impacts should be integrated into the methodology”⁶.

The benchmarking workshop report provides evidence that ecosystem knowledge was factored into discussions. With both the central Baltic Sea herring and Baltic Sea sprat sections refer to the impact of predation by cod on biomass and that this is factored into the assessments⁶.

Based on the information, the fishery passes Clause E3.1.

References

1. Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007. <https://eur-lex.europa.eu/legalcontent/en/TXT/?uri=CELEX:32016R1139>
2. International Council for the Exploration of the Sea. (2025). Ecosystem Overviews. <https://www.ices.dk/advice/ESD/Pages/Ecosystemoverviews.aspx>
3. International Council for the Exploration of the Sea. (2024). Workshop for the revision of Ecosystem Overviews of the Baltic Sea Ecoregion (WKBALFO). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.27203316.v1>
4. Casini, M., Cardinale, M., & Arrhenius, F. (2004). Feeding preferences of herring (*Clupea harengus*) and sprat (*Sprattus sprattus*) in the southern Baltic Sea. *ICES Journal of Marine Science*, 61(8), 1267- 1277. <https://ui.adsabs.harvard.edu/abs/2004ICJMS..61.1267C/abstract> Österblom, H.,
5. Casini, M., Olsson, O., & Bignert, A. (2006). Fish, seabirds and trophic cascades in the Baltic Sea. *Marine Ecology Progress Series*, 323, 233-238. <https://www.intres.com/abstracts/meps/v323/meps323233>
6. International Council for the Exploration of the Sea. (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBALFPEL). ICES Scientific Reports. 5:47. 350 pp. <https://doi.org/10.17895/ices.pub.23216492>

E3.2	E3.2 There is no substantial evidence that the fishery has a significant negative impact on the marine ecosystem. <i>In reaching a determination for E3.2, the assessor should consider if the following is in place:</i> E3.2.1 The information collected in relation to E3.1.3 indicates that the fishery does not have a significant negative impact on marine ecosystems.
Outcome	Pass
Rationale In the most recent Ecosystem Overview for the Baltic Sea, results indicate that the most prevalent pressures in the Baltic Sea are related to nutrient discharge from multiple sources, the impacts of species extraction from fisheries, including bycatch, and substrate disturbance. Contaminants and litter, mainly due to their persistence and widespread nature, were identified as significant pressures¹. The most significant potential ecosystem impacts of the fishery arise from the removal of herring and sprat biomass. However, while fishing is the main activity impacting the ecosystem via selective extraction of species, agriculture, forestry and wastewater discharge, pose the major pressures on the ecosystem through nutrient and organic enrichment¹. Although the understanding of the Baltic Sea ecosystem is relatively advanced compared to other marine regions, significant knowledge gaps remain on the cumulative effects of pressures on ecosystem components. For instance, key areas of uncertainty include understanding how changes in species diet composition alter their trophic positions within the food web, particularly under the influence of human activities (such as fishing) and climate change. This type of information is currently fragmented, yet essential for thoroughly assessing the impacts of anthropogenic pressures and climate-driven shifts on ecosystem dynamics¹. The Ecosystem Overview of the Baltic Sea states that since the late 1980s “the open-sea system has been dominated by small pelagic fish, such as sprat and herring”¹. Additionally, despite the knowledge gaps, ICES catch recommendations are calculated with ecosystem considerations to minimise fisheries ecosystem impacts. No other evidence was encountered to indicate that the fishery has a significant negative impact on the marine ecosystem. Based on the information, the fishery passes Clause E3.2.	
References 1. International Council for the Exploration of the Sea. (2024). Workshop for the revision of Ecosystem Overviews of the Baltic Sea Ecoregion (WKBALEO). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.27203316.v1	

E3.3	E3.3 There is an ecosystem management strategy in place for the fishery. <i>In reaching a determination for E3.3, the assessor should consider if the following is in place:</i>
	E3.3.1 There are measures applied to the fishery which are designed to manage the impacts of the fishery on marine ecosystems.
	E3.3.2 The measures are considered likely to prevent the fishery from having a significant negative impact on marine ecosystems.
Outcome	<i>Pass</i>
Rationale ICES considers ecosystem-based management (EBM) the primary way of managing human activities affecting the marine ecosystem¹. Accordingly, ICES fishing opportunity advice incorporates EBM principles, accounting for ecosystem productivity changes with the overarching objective of achieving MSY. The goal is to inform policies that ensure high long-term yields while sustaining productive fish stocks within healthy marine ecosystems. Additionally, the fishery is managed according to the MAP, which aims to implement an ecosystem-based approach to fisheries management to minimise the negative impacts of fishing activities on the marine ecosystem. Additionally, as documented throughout this report, the herring and sprat fisheries in the Baltic Sea are subject to management measures aimed at mitigating their impact on the marine ecosystem, such as the establishment of TACs, technical regulations, regionalisation, the requesting of scientific advice, and enforcement and monitoring activities, all designed to ensure sustainable fishing practices and protect the broader ecosystem. Based on the information, the fishery passes Clause E3.3.	
References 1. International Council for the Exploration of the Sea. (2023). Guide to ICES advisory framework and principles. https://ices-library.figshare.com/articles/report/Guide_to_ICES_advisory_framework_and_principles/22116890?file=39303008	

Annex 1: External Peer Review report

Assessment and determination summary

Fishery name	Denmark - Herring (<i>Clupea harengus</i>) and sprat (<i>Sprattus sprattus</i>) - FAO 27, ICES 25-29, 32 (excluding Gulf of Riga)
MarinTrust report code	WF09
Type 1 species (common name, Latin name)	Herring (<i>Clupea harengus</i>) and sprat (<i>Sprattus sprattus</i>)
Fishery location	FAO 27, ICES 25-29, 32 (excluding Gulf of Riga)
Gear type(s)	Pelagic trawl
Management authority (country/state)	European Union, Denmark
Certification Body recommendation	Approved
FAPRG reviewer recommendation	Agree with CB determination

Summary of peer review outcomes

Summary
<i>Provide any information about the fishery that the reviewers feel is significant to their decision. This summary is used by the Certification Body in the Fishery Assessment Report.</i>
Several weaknesses should be mentioned. The most important are the incomplete external peer-review documentation, the need to better explain the transition from Category A failures to Category B passes, uncertainties concerning Russian catches and herring–sprat misreporting, and the use of relatively old catch-composition data. Overall, the document is considered a technically advanced and well-supported draft, but it requires additional quality assurance and more transparency before being regarded as a fully finalized assessment.
General comments on the draft report provided to the peer reviewer
The document reviews the strengths and weaknesses of the MarinTrust surveillance assessment of the Danish herring (<i>Clupea harengus</i>) and sprat (<i>Sprattus sprattus</i>) fishery in FAO Area 27. Overall, the assessment has a strong technical structure and scientific basis, making extensive use of ICES stock assessments, EU and Danish management regulations, surveillance information, and enforcement data. It also appropriately identifies important issues such as catches exceeding scientific advice, species misreporting, uncertainties in Russian catch data, and ecosystem knowledge gaps.

Peer reviewers should review the fishery assessment report with the primary objective of answering the key questions listed in the table below. When the situation is more complicated, reviewers may answer “See Notes” instead.

1. Has the fishery assessment been fully completed, using the recognised MarinTrust fishery assessment methodology and associated guidance?	Yes
2. Does the Species Categorisation section of the report reflect the	Yes

best current understanding of the catch composition of the fishery?	
3. Are the scores in the following sections consistent with the MarinTrust requirements (i.e. do the scores reflect the evidence provided)?	Yes
Section M – Management Requirements	Yes
Category A Species	Yes
Category B Species	Yes
Category C Species	Yes
Category D Species	Yes
Section E – Ecosystem Impacts	Yes

Detailed Peer Review Justification

Peer reviewers should provide support for their answers in the boxes provided, by referring to specific scoring issues and any relevant documentation as appropriate.

Detailed justifications are only required where answers given are one of the 'No' options. In other (Yes) cases, either confirm 'scoring agreed' or identify any places where weak rationales could be strengthened (without any implications for the scores).

Boxes may be extended if more space is required.

1. Has the fishery assessment been fully completed, using the recognised MarinTrust fishery assessment methodology and associated guidance?	Yes
scoring agreed	
Certification Body response	
N/A	

2. Does the species categorisation section of the report reflect the best current understanding of the catch composition of the fishery?	Yes
scoring agreed	
Certification Body response	
N/A	

3. Is the scoring of the fishery consistent with the MarinTrust requirements, and clearly based on the evidence presented in the assessment report?	Yes
scoring agreed	
Certification Body response	

N/A

3a. Are the “Category A Species” scores clearly justified?	Yes
scoring agreed	
Certification Body response	
N/A	

3b. Are the “Category B Species” scores clearly justified?	Yes
scoring agreed	
Certification Body response	
N/A	

3c. Are the “Category C Species” scores clearly justified?	Yes
scoring agreed	
Certification Body response	
N/A	

3d. Are the “Category D Species” scores clearly justified?	Yes
scoring agreed	
Certification Body response	
N/A	

Are the scores in “Section M – Management Requirements” clearly justified?	Yes
scoring agreed	
Certification Body response	
N/A	

Are the scores in “Section E – Ecosystem Impacts” clearly justified?	Yes
scoring agreed	
Certification Body response	
N/A	

Optional: General peer reviewer comments on the draft report	
The document is technically advanced though it may requires additional quality assurance and more transparency before being regarded as a fully finalized assessment. In particular, the rationale connecting the documented uncertainties and Category A failures with the overall “Approve” conclusion should be made much clearer	
Certification Body response	
Thank you for your comments. The suggested revisions have been made.	