



MarinTrust Whole fish fishery assessment report

Finland
Herring (*Clupea harengus*)
and Sprat (*Sprattus sprattus*)
in FAO 27, ICES 3.d.25-29, 32
(Central Baltic Sea, excl. Gulf of Riga)

Surveillance 1
WF40

Table 1: Whole fish fishery assessment scope

Fishery name	Finland - <i>Clupea harengus</i> - Herring and <i>Sprattus sprattus</i> - Sprat - FAO 27, ICES 3.d.25-29, 32 (Central Baltic Sea, excl. Gulf of Riga)
MarinTrust report code	WF40
Type 1 species (common name, Latin name)	Herring (<i>Clupea harengus</i>); Sprat (<i>Sprattus sprattus</i>)
Fishery location	FAO 27, ICES 3.d.25-29, 32 (Central Baltic Sea, excl. Gulf of Riga)
Gear type(s)	Pelagic trawls
Management authority (country/state)	Finland / EU

Table 2: Applicant and Certification Body details

Application details			
Applicant(s)	Ab Salmonfarm Oy		
Applicant country	Finland		
Certification Body details			
Name of Certification Body	NSF / Global Trust Certification Ltd		
Contact Information for CB (e.g. email address/address/telephone number)	Fisheries@nsf.org		
Fishery Assessor name	Sam Peacock		
CB Peer Reviewer name	Matthew Jew		
Number of assessment days	1.5	Assessment period	11/2025 – 12/2025

Table 3: Assessment outcome

Assessment outcome (See Table 4 for a summary of assessment determination)		Approve
Approval validity	Valid from: 11/2025	Valid until: 11/2026
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	
<p>This report is the first surveillance assessment of the Finland herring and sprat fishery in the Baltic Sea excluding the Gulf of Riga. There have been no substantial changes since the time of the initial assessment.</p> <p>There are minor changes to the catch composition of the fishery and therefore the species categorisation section of this report. Sprat, which was previously the main species in the catch, represented only 13.5% of catch in 2024. The main species caught was herring, which as previously originated primarily from the Central Baltic stock but also in small quantities from the Gulf of Riga stock. Therefore, as in the initial assessment, there are two Type 1 stocks, with Gulf of Riga herring being Type 2.</p> <p>Baltic sprat meets the Category A requirements. Smelt meets the Category D requirements. Central Baltic herring does not meet the requirements of Clauses A3.2, A3.3 or A4.1, as there is evidence that the fishery would remain open if stock biomass fell below the limit reference point. As per the MT fishery assessment methodology, Central Baltic herring was further assessed under Category B, where it does meet the requirements. Gulf of Riga herring meets the Category C requirements.</p> <p>The Type 2 species identified by the initial assessment, smelt (<i>Osmerus eperlanus</i>), remained present in the catch. Additionally, vendace (<i>Coregonus Albula</i>) is now present in sufficient quantities to require a Type 2 assessment. Both species received a Pass rating under the Category D assessment.</p> <p>As previously, the fishery is managed under a legal, scientific and enforcement framework which meets the requirements of Sections M and E. As a result, the MT whole fish requirements are met and the fishery can remain approved for use as a source of raw material for MT-certified facilities.</p> <p>Note that the Category A, B and C components of this assessment have been harmonised with the other assessment reports which encompass those stocks.</p>	
<p>Summary of CB peer review</p>	<p>The assessor made a decision on species classification that is well supported and justified through a detailed rationale.</p> <p>The management (M1 and M2) and ecosystem (E1, E2, and E3) are fully detailed and the rationales support the scoring criteria.</p> <p>Herring (<i>Clupea harengus</i>), which originates from the Central Baltic stock and sprat (<i>Sprattus sprattus</i>) from the Baltic sea were properly categorized and assessed under Category A. Both stocks passed all subcategories and scoring clauses. Central Baltic herring failed after the assessor correctly determined that there are no closure protocols in place if biomass fell below LRP. Therefore, the stock passes Category B as the stock is above LRP and fishing pressure is below Target reference point.</p>

	<p>Herring in the Gulf of Riga was assessed under category C and passed both scoring clauses.</p> <p>Smelt (<i>Osmerus eperlanus</i>) and vendace (<i>Coregonus Albula</i>) were assessed under Category D. The attribute scores and subsequently average scores were calculated correctly and passes Category D per Table D(b).</p> <p>Therefore, the decision for approval under MarinTrust Wholefish v3.0 standard is supported by the CB.</p>
<p>Summary of external peer review (see Appendix 1 for the full peer review report)</p>	<p>The first surveillance of the Finnish herring and sprat fishery in the Baltic Sea (excluding the Gulf of Riga) found no major changes since the initial whole fishery assessment, though catch composition shifted, with sprat falling to 13.5% of the 2024 catch and herring, mainly from the Central Baltic stock, remaining the primary species. As before, the fishery contains two Type 1 stocks (sprat and central herring), with Gulf of Riga herring classified as Type 2, along with smelt and vendace. Baltic sprat meets Category A requirements, Gulf of Riga herring meets Category C, smelt and vendace meet Category D requirements. Central Baltic herring fails A3 and A4, but meets Category B requirements. Finally, the fishery continues to operate within a legal, scientific and enforcement framework that satisfies Sections M and E. In conclusion; the peer reviewer agrees with CB assessment.</p>
<p>Notes for on-site auditor</p>	

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>), Baltic Sea	A1	PASS
		A2	PASS
		A3	PASS
		A4	PASS
	Herring (<i>Clupea harengus</i>), Central Baltic	A1	PASS
		A2	PASS
		A3	FAIL
		A4	FAIL
Category B	Herring (<i>Clupea harengus</i>), Central Baltic	PASS	
Category C	Herring (<i>Clupea harengus</i>), Gulf of Riga	PASS	
Category D	Smelt (<i>Osmerus eperlanus</i>)	PASS	
	Vendace (<i>Coregonus Albula</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)
Herring (<i>Clupea harengus</i>)	Central Baltic	No	Least Concern ¹	85%	Y	A
	Gulf of Riga			0-1%	Y	C
Sprat (<i>Sprattus sprattus</i>)	Baltic Sea	No	Least Concern ²	13.5%	Y	A
Smelt (<i>Osmerus eperlanus</i>)	n/a	No	Least Concern ³	0-1%	N	D
Vendace (<i>Coregonus Albula</i>)	n/a	No	Least Concern ⁴	0-1%	N	D

Rationale

The initial assessment for this fishery used several data sources to identify the likely catch composition, concluding that herring and sprat were Type 1 species and smelt was Type 2. The following table was taken from the Scientific, Technical and Economic Committee for Fisheries (STECF) Fisheries Dependent Information database (STECF 2025) using filters to capture all fish caught by Finland-flagged vessels targeting the small pelagic assemblage in the Baltic Sea in 2024, the most recent year for which data are available. The catch composition is similar to previously, with the following exceptions:

1. Sprat, which was previously the largest component of the catch, represented only 13.5% in 2024. This does not affect the species categorisation for the purposes of this report.
2. An additional Type 2 species was identified, vendace (*Coregonus Albula*).

Species	Catch	% total catch
Herring	37,050t	85.5%
Sprat	5,838t	13.5%
Smelt	350t	0.8%
Vendace	115t	0.3%
Total	43,353t	

¹ <https://www.iucnredlist.org/species/155123/45074983>

² <https://www.iucnredlist.org/species/198583/45077260>

³ <https://www.iucnredlist.org/species/15631/135090814>

⁴ <https://www.iucnredlist.org/species/242158594/242163476>

As previously, herring catches in the Baltic Sea are primarily individuals from the Central Baltic herring stock, but also small quantities from the Gulf of Riga stock (under 1%, according to the ICES advice (ICES 2025)). The former is therefore assessed as a Type 1 stock and the latter as Type 2. There are species-specific stock assessment activities and management measures in place for all three Type 1 stocks, therefore all three were assessed under Category A. There are no such measures in place for either of the Type 2 species, thus both were assessed under Category D.

References

ICES (2025). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report.

<https://doi.org/10.17895/ices.advice.27202617.v1>

STECF (2025). Fisheries Dependent Information database: https://stecf.ec.europa.eu/data-dissemination/fdi_en

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

There have been no substantial changes in this section since the initial assessment.

M1.1	<p>M1.1 There is an organisation responsible for managing the fishery.</p> <p><i>In reaching a determination for M1.1, the assessor should consider if the following is in place:</i></p>
	<p>M1.1.1 The management and administration organisations within the fishery are clearly identified.</p>
	<p>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.</p>
	<p>M1.1.3 Fishers have access to information and/or training materials through nationally recognised organisations.</p>
<p>Outcome</p>	<p><i>Pass</i></p>
<p>Rationale</p> <p>Fisheries in EU member states are managed according to the Common Fisheries Policy (CFP), which was most recently updated through Regulation (EU) No. 1380/2013. Individual member states generally incorporate the requirements of the CFP into their national legislation, and are individually responsible for its implementation. The CFP therefore sets out the policies and procedures by which member states manage their fisheries (EC 2018). The small pelagic fishery in the Baltic Ocean is conducted by vessels from a range of EU states, including Poland, Lithuania, Denmark, Latvia, Sweden, Finland, and Germany. Within Finland, the organisation responsible for managing fisheries is the Fisheries Department of the Ministry of Agriculture and Forestry (MMM 2024).</p> <p>There are organisations responsible for managing the fishery, and M1.1 is met.</p>	

References

EC (2018). Common Fisheries Policy. https://ec.europa.eu/oceans-and-fisheries/policy/common-fisheries-policy-cfp_en

MMM (2024). Fisheries. <https://mmm.fi/en/fisheries>

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. <https://www.legislation.gov.uk/eur/2013/1380/contents#>

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 EU member states fisheries management is generally carried out under the national legislation arising from the implementation and/or transposing of EU regulations, in particular but not limited to Regulation (EU) No 1380/2013. In Finland the primary legislation is the Fishing Act 2015, which regulates fishing activity within the Finnish EEZ and activity carried out by Finland-flagged vessels.

Any fishing vessel flying the flag of an EU member state must register to the EU Fleet Register (EC 2024). The CFP renders fishing licences mandatory for all EU vessels, with licenses issued by the individual member states (European Parliament 2024).

Fishery management organisations are legally empowered to take management actions, and M1.2 is met.

References

EC (2024). Fleet register. https://webgate.ec.europa.eu/fleet-europa/index_en

Finland Fishing Act 2025: <https://www.finlex.fi/en/laki/kaannokset/2015/en20150379.pdf>

European Parliament (2024). Fisheries control. <https://www.europarl.europa.eu/factsheets/en/sheet/116/fisheries-control>

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. <https://www.legislation.gov.uk/eur/2013/1380/contents#>

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.
Clause outcome	<i>Pass</i>

Rationale

The primary organisation responsible for coordinating and analysing the data relevant to the management of the Baltic Sea herring and sprat fishery is the International Council for the Exploration of the Sea (ICES). ICES is an intergovernmental marine science organisation which provides frequent analytical and advisory services for the management of fisheries, primarily in the Atlantic but also in the Arctic, Mediterranean, Black Sea and North Pacific (ICES 2024).

ICES carries out an annual stock assessment of the Central Baltic herring and Baltic Sea sprat stocks, along with periodic benchmarking exercises to ensure the stock assessment processes and their underpinning assumptions remain appropriate. As a key output of the stock assessment process, ICES produces a recommendation for the appropriate level of fishery removals of both species in the coming fishing season (ICES 2024a). Advice is independent from the management organisations, and is provided according to detailed

methodology and principles set out in ICES documentation (ICES 2020).

There are organisations responsible for collecting data and assessing the fishery. Requirement M1.3 is met.

References

ICES (2020) Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2020. ICES Advice 2020, Guide to ICES Advice. <https://doi.org/10.17895/ices.advice.7648>

ICES (2024). Who we are. <https://www.ices.dk/about-ICES/who-we-are/Pages/Who-we-are.aspx>

ICES (2024a). Latest Advice. <https://www.ices.dk/advice/Pages/Latest-Advice.aspx>

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 Baltic Sea herring and sprat stocks are managed according to a Multiannual Plan (MAP), which sets out, *inter alia*, the policy behind the annual catch limits for commercially important species in the Baltic Sea. The MAP is codified in Regulation (EU) 2016/1139, which includes the following commitments to sustainable harvesting:

Article 3, Paragraph 1: “The plan shall contribute to the achievement of the objectives of the common fisheries policy (CFP) listed in Article 2 of Regulation (EU) No 1380/2013, in particular by applying the precautionary approach to fisheries management, and shall aim to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce MSY”

Article 3, Paragraph 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”

Article 5, Paragraph 2: “When scientific advice indicates that the spawning stock biomass of any of the stocks concerned is below the minimum spawning stock biomass reference point as set out in Annex II, column A, to this Regulation, all appropriate remedial measures

shall be adopted to ensure rapid return of the stock concerned to levels above the level capable of producing MSY”

The fishery management system is based on the principles of sustainable fishing and the precautionary approach, and M1.4 is met.

References

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/legal-content/EN/TXT/?uri=CELEX%3A32016R1139>

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 Baltic Sea Advisory Committee (BSAC) is a stakeholder-led organization, established in 2006, which provides advice on the management of Baltic fisheries to the European Commission and member states and consists of organisations representing fisheries and other interest groups affected by the CFP (e.g. environmental, organisations, and sports and recreational fisheries organisations). Following CFP reform, a new regulation was adopted at the end of 2013 in which the role and function of Advisory Councils has been included - Advisory Councils are consulted in the context of regionalisation and should also contribute to data for fisheries management and conservation measures. There is evidence of this, in the form of consultation responses and advice provided to the European Commission and others, on the BSAC website (BSAC 2024).

ICES provide annual stock assessment and management advice in relation to central Baltic herring and Baltic sprat via its Baltic Fisheries Assessment Working Group (WGBFAS). The advice is published annually on the ICES website (ICES 2024). Quotas for the EU fleet in the assessment area are set annually through the AGRIFISH Council meeting of EU Fisheries Ministers and are published annually in the Baltic Sea Fishing Opportunities Regulation (e.g. EUR-Lex 2024).

There is a clearly-defined decision-making process in place, and M1.5 is met.

References

BSAC (2024). About the Baltic Sea Advisory Council. <https://www.bsac.dk/about/>

EUR-Lex (2024). <https://eur-lex.europa.eu/EN/legal-content/summary/fishing-opportunities-in-the-baltic-sea-2024.html>

ICES (2024). Latest Advice. <https://www.ices.dk/advice/Pages/Latest-Advice.aspx>

M2 Surveillance, control and enforcement

There have been no substantial changes in this section since the initial assessment.

M2.1	<p>M2.1 There is an organisation responsible for monitoring compliance with fishery laws and regulations.</p> <p><i>In reaching a determination for M2.1, the assessor should consider if the following is in place:</i></p>
	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	
<p>Each EU Member State maintains an official website on fishery related control and reporting issues, which are of benefit to the Commission, other Member States and the masters of fishing vessels.</p>	

National websites contain information on:

- Description of control services and the resources available;
- National control action programmes;
- Fishing effort limitation schemes;
- Contact details for the submission of logbooks and landing declarations when landing in that Member State;
- Lists of designated ports for landing of certain species and addresses for fulfilling notification requirements.

Member States are required to apply “effective, proportionate and dissuasive sanctions” against those engaged in IUU or other illegal activities. The European Fisheries Control Agency (EFCA) coordinates national control and inspection activities within the EU, with the mission to promote the highest common standards for control, inspection and surveillance under the CFP (EFCA 2024).

Joint Deployment Plans (JDP’s) are established for fisheries/areas considered a priority by the Commission and the Member States concerned. They can refer either to European Union waters for which a Specific Control and Inspection Programme (SCIP) has been adopted or to international waters under the competence of a Regional Fisheries Management Organisation (RFMO), where EFCA is requested to coordinate the implementation of the European obligations under an International Control and Inspection Scheme. The Baltic Sea JDP has been in place since 2007 (EFCA 2024a).

Compliance with laws and regulations is monitored through the use of at-sea and portside inspections, e-logbooks, landings certificates, sales notes, VMS, designated ports, and inspections throughout the supply chain. Control efforts are targeted using a risk-based model, which ensures that inspections and other enforcement activity is focussed in areas where low levels of compliance have been detected in the past. Control and enforcement activities are also carried out through the JDP.

There are organisations responsible for monitoring compliance, and M2.1 is met.

References

EFCA (2023). Baltic Sea JDF control activities, Q3 report 2023.

https://www.efca.europa.eu/sites/default/files/2024-01/9M-report_BS_Q2_WEB.pdf

EFCA (2024). European Fisheries Control Agency Objectives and Strategy.

<https://www.efca.europa.eu/en/content/objectives-and-strategy>

EFCA (2024a). Baltic Sea JDF reports, 2023.

<https://www.efca.europa.eu/en/content/reports-2023-1>

M2.2	M2.2 There is a framework of sanctions which are applied when infringements against laws and regulations are discovered.
	<i>In reaching a determination for M2.2, the assessor should consider if the following is in place:</i>
	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	
<p>To ensure that fishing rules are applied in the same way in all member countries, and to harmonise the way infringements are sanctioned, the EU has established a list of serious infringements of the rules of the common fisheries policy. EU countries must include in their legislation effective, proportionate and dissuasive sanctions, and ensure that the rules are respected. A maximum sanction of at least five times the value of fishery products obtained is provided for with regard to the committing of the said infringement.</p> <p>In Finnish fisheries, sanctions are set out in Chapter 12 of the Fisheries Act 2015, and include fines and confiscation.</p> <p>There is a framework of sanctions, and M2.2 is met.</p>	
References	
Finland Fishing Act 2025: https://www.finlex.fi/api/media/statute-foreign-language-translation/689140/mainPdf/main.pdf?timestamp=1982-04-15T21%3A00%3A00.000Z	

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>
<p>Rationale</p> <p>The Joint Deployment Plan (JDP) for the Baltic involved competent authorities for fisheries control and protection vessels from Germany, Denmark, Estonia, Finland, Latvia, Lithuania, Poland and Sweden. Reports on the control and enforcement activities of the JDP are published regularly on the EFCA website (EFCA 2025). The most recent available report covers the period January 2023 – September 2023. During this period, there were 2,175 inspections conducted ashore, with 68 suspected infringements, and 640 inspections carried out at sea, detecting 14 suspected infringements. Of the infringements detected, the most common types related to misreporting of catch quantities or not reporting in time. Infringements were detected in around 2% of at-sea inspections and 3% of on-land inspections, suggesting low levels of non-compliance (EFCA 2025a).</p> <p>There is evidence of compliance in the fishery, and M2.3 is met.</p>	
<p>References</p> <p>EFCA (2025). Baltic Sea JDF reports, 2025. https://www.efca.europa.eu/en/content/BalticS-reports-2025</p> <p>EFCA (2025a). Baltic Sea JDF control activities, Q1 report 2025. https://www.efca.europa.eu/sites/default/files/2025-10/3M-2025-WEB%20report-JDP-BS.pdf</p>	

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.

Baltic 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	
<p>The EU Fisheries Control System, through the Fisheries Control Regulation (EC Regulation No 1224/2009), requires that each vessel record data on catches (target species and bycatch) in logbooks and complete a landing declaration indicating specifically all quantities of each species landed. Information should be transmitted to the competent authority of each member state, who then provide it to the Commission. (EC 2009).</p> <p>Russia does not report landing information to ICES; however, the Baltic Fisheries Assessment Working Group (WGBFAS) estimates catches based on information available on the Russian Federation's official websites, providing a comprehensive overview of the fishery removals (ICES</p>	

2025a). Uncertainty around the accuracy of this catch data is factored into the stock assessment process.

The total catch of sprat in the Baltic Sea in 2024 was 239,888 (ICES 2025b)

Landings data are collected and A1.1 is met.

Catches

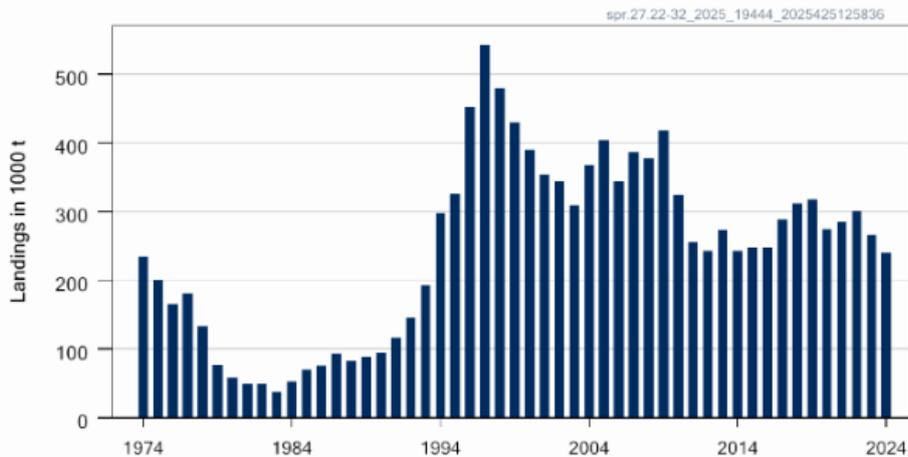


Figure 1 - Sprat catches from 1974 to 2024 in ICES subdivisions 22–32, Baltic Sea (ICES 2025b)

References

EC (2009). Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Union control system for ensuring compliance with the rules of the common fisheries policy. In force. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1224-20241011>.

ICES (2025a). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

ICES (2025b). Sprat (*Sprattus sprattus*) in subdivisions 22-32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202893.v1>

A1.2	A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.
Outcome	<i>Pass</i>
<p>Rationale</p> <p>In addition to commercial catch data, the stock assessment carried out annually by the ICES Baltic Fisheries Assessment Working Group (WGBFAS) utilises two acoustic survey indices (the Baltic Acoustic Spring Survey (BASS) and the Baltic International Acoustic Survey (BIAS)); and natural mortalities from the ICES multispecies model (ICES 2025). The model assumes discards and bycatch</p>	

are negligible. During surveys, sampling is done with echo sounders and pelagic trawls. All fish species in the catch are measured in length, and biological samples, including age, are taken on the target species, herring and sprat. The Baltic Sea countries meet in the Baltic International Fish Survey Working Group (WGBIFS), and the results from each country are compiled in a common database. (SLU 2025, ICES 2024).

The 2025 catch advice includes a section covering the quality of the assessment, which notes that misreporting of herring and sprat is an ongoing problem which is challenging to quantify, and which introduces an unquantifiable level of uncertainty into the assessment. However, efforts are underway to estimate the levels of misreporting (ICES 2025).

Sufficient additional information is collected to enable an indication of stock status to be estimated, and A2.1 is met.

References

ICES (2024). Baltic International Fish Survey Working Group (WGBIFS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.25922290.v1>

ICES (2025). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

SLU (2025). Sveriges lantbruksuniversitet (Swedish University of agricultural Sciences). BIAS – Baltic International Acoustic Survey. <https://www.slu.se/en/environment/statistics-and-environmental-data/environmental-data-catalogue/bias/>.

A2 Stock assessment

<p>A2.1</p>	<p>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.</p>
<p>Outcome</p>	<p><i>Pass</i></p>
<p>Rationale</p> <p>Sprat in the Baltic Sea, is subjected to an annual stock assessment carried out by the ICES Baltic Fisheries Assessment Working Group (WGBFAS). The stock was benchmarked in 2023 (ICES, 2023a), and outcomes were implemented in the last assessment published in 2025 (ICES, 2025). The benchmarking process ensures 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 methodology (ICES, 2023b).</p> <p>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,</p>	

and natural mortality. Additionally, fishery-independent information from the Baltic International Acoustic Survey (BIAS) and the Baltic Spring Survey (BASS) were also utilized. (ICES, 2025).

An annual stock assessment is conducted and A2.1 is met.

References

ICES. (2023a) Benchmark Workshop on Baltic Pelagic stocks (WKBBALTPEL). ICES Scientific Reports. 5:47. <https://doi.org/10.17895/ices.pub.23216492>

ICES. (2023b). Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, section 1.1. <https://doi.org/10.17895/ices.advice.22116890>

ICES (2025). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

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	
<p>The WGBFAS stock assessment indicates the status of the stock relative to target and limit reference points. These reference points were updated in 2023 as a result of the full benchmarking of the stock (ICES 2023) The reference points are listed in the table below. Key amongst these for the purpose of this MT assessment are the management plan target reference point (MAP MSY $B_{trigger}$ = 541,000t) and limit reference point (MAP B_{lim} = 459,000t) (ICES 2025).</p> <p>The 2025 stock assessment predicted that SSB at spawning time in 2025 would be 601,856t, and the 2025 catch advice states that “Spawning-stock size is above MSY $B_{trigger}$, B_{PA}, and B_{lim}” (ICES 2025).</p> <p>The assessment provides an indication of stock status relative to reference points, and A2.2 is met.</p>	

Framework	Reference point	Value	Technical basis	Source
Maximum sustainable yield (MSY) approach	MSY $B_{trigger}$	541 000	B_{PA}	ICES (2023a)
	F_{MSY}	0.34	Stochastic simulations with Beverton–Holt and segmented regression stock-recruitment model	ICES (2023a)
Precautionary approach	B_{lim}	459 000	Biomass that produces half of the maximal recruitment in the Beverton–Holt stock-recruitment relationship	ICES (2023a)
	B_{PA}	541 000	$B_{lim} \times \exp(1.645 \times \sigma)$, where $\sigma = 0.1$	ICES (2023a)
	F_{PA}	0.35	F_{P05} ; the F that leads to SSB $\geq B_{lim}$ with 95% probability	ICES (2023a)
Management plan	Multiannual plan (MAP) MSY $B_{trigger}$	541 000	MSY $B_{trigger}$	ICES (2023a)
	MAP B_{lim}	459 000	B_{lim}	ICES (2023a)
	MAP F_{MSY}	0.34	F_{MSY}	ICES (2023a)
	MAP target F_{lower}	0.26	Consistent with the ranges that result in a $\leq 5\%$ reduction in long-term yield compared with MSY	ICES (2023a)
	MAP target F_{upper}	0.35	Consistent with the ranges that result in a $\leq 5\%$ reduction in long-term yield compared with MSY, constrained by F_{P05}	ICES (2023a)

Figure 2 - Sprat in ICES subdivisions 22-32 (Baltic Sea) reference points, values, and their technical basis. Weight in tonnes (ICES 2025).

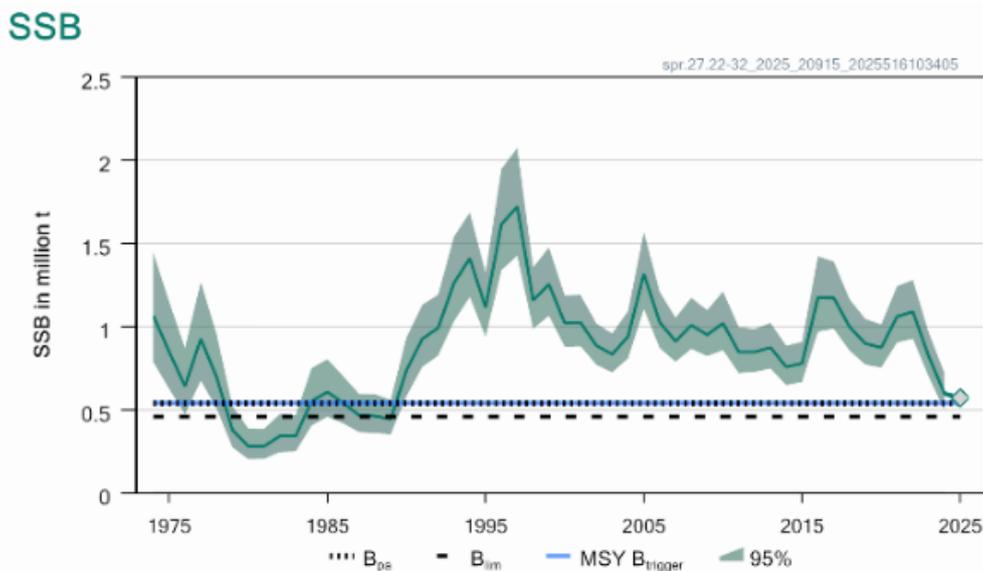


Figure 3 - Sprat in ICES subdivisions 22-32 (Baltic Sea) spawning-stock size above MSY $B_{trigger}$, B_{pa} , and B_{lim} (ICES 2025)

References

- ICES (2023) Benchmark Workshop on Baltic Pelagic stocks (WKBALTPEL). ICES Scientific Reports. 5:47. <https://doi.org/10.17895/ices.pub.23216492>
- ICES (2025). Sprat (*Sprattus sprattus*) in subdivisions 22-32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202893.v1>

A2.3	A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.
Outcome	<i>Pass</i>
<p>Rationale</p> <p>The annual ICES advice provides an indication of the volume of fishery removals which is appropriate for the current stock status in the form of recommended catches in the upcoming year.</p> <p>The latest advice indicates that when the EU multiannual plan (MAP) for the Baltic Sea is applied, catches in 2026 that correspond to the F ranges in the plan are between 176,056 tonnes and 230,518 tonnes. According to the MAP, catches higher than those corresponding to FMSY (224,616 tonnes) can only be taken under conditions specified in the plan, while the entire range is considered precautionary when applying the ICES advice rule (ICES 2025)</p> <p>The stock assessment provides an indication of an appropriate level of fishery removals, and A2.3 is met.</p>	
<p>References</p> <p>ICES (2025). Sprat (<i>Sprattus sprattus</i>) in subdivisions 22-32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202893.v1</p>	

A2.4	A2.4 The assessment is subject to internal or external peer review.
Outcome	<i>Pass</i>
<p>Rationale</p> <p>The Guide to the ICES Advisory Framework and Principles (ICES 2023) outlines the process by which ICES conducts scientific activities and provides fisheries management advice. When the results of the assessments are agreed by the ICES groups, they are sent to the ICES Advice Drafting Group, which consists of National Experts, who review them, and they are finally reviewed by the Advisory Committee (ACOM), which delivers the ICES advice. The ACOM advice is grounded on 10 principles to support ecosystem-based management advice. 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 question (ICES 2023).</p>	

Principle 7 states that the process undergoes a peer review phase 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. (ICES 2023). The sprat stock assessment was most recently benchmarked in 2023; thus, it was subject to peer review (ICES 2025).



Figure 4 - ICES advice principles, Principle 7 states that the process undergoes a peer review phase. (ICES 2023).

The assessment is peer reviewed, and A2.4 is met.

References

ICES. (2023). Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, section 1.1. <https://doi.org/10.17895/ices.advice.22116890>

ICES (2025). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

A2.5	A2.5 The assessment is made publicly available.
Outcome	<i>Pass</i>
<p>Rationale</p> <p>All the stock assessment information used to produce this MarinTrust assessment report was publicly available. Specifically, information is published in the WGBFAS report (ICES 2023a) and the catch advice (ICES 2025). Additionally, the publication of methodologies, data, deliberations, and outcomes is a core part of the ICES process, as set out by the ICES Advisory Framework and Principles, particularly Principles 4, 5 and 6 (ICES 2023b).</p> <p>The stock assessment is publicly available, and A2.5 is met.</p>	
<p>References</p> <p>ICES (2023a) Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. 5:58. 606 pp. https://doi.org/10.17895/ices.pub.23123768</p>	

ICES. (2023b). Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, section 1.1. <https://doi.org/10.17895/ices.advice.22116890>

ICES (2025). Sprat (*Sprattus sprattus*) in subdivisions 22-32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202893.v1>

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	
<p>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) (EU 2016). 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 resources (FAF 2021).</p> <p>There is a mechanism in place to restrict total fishing mortality, and A3.1 is met.</p>	
References	
<p>EU (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. In force. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R1139-20240710.</p> <p>FAF (2021). Federal Agency for Fisheries. Federal Law of 20.12.2004 N 166-FZ "On Fisheries and Conservation of Aquatic Biological Resources" https://fish.gov.ru/wp-content/uploads/documents/documenty/federalnye_zakony/Federalnyj-zakon_166-FZ_ot_20-12-2004.pdf. Translated by Google.</p>	

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>Pass</i>

Rationale

Since 2018, ICES has provided a range of potential catch recommendations to reflect the specifics of the Baltic Sea MAP (see A2.3). The total international quota – i.e. the sum of the EU TAC and the Russian autonomous quota – is generally within the boundaries of the ICES advice, although in the past it has sometimes exceeded the upper boundary of the advice. However, this did not occur between 2020 and 2024. In 2025 the total international TAC has been set around 9% higher than the maximum recommended catch; it remains to be seen whether this will lead to landings significantly above the advice.

SSB has been estimated to be well above the limit reference point since the 90s. Since 2021 catch estimations have not exceeded the top end of the range of advice provided by ICES.

Catches rarely exceed the advice by more than 10%, and SSB has been above the current target reference point for over 30 years. A3.2 is met; however, future assessments should review this conclusion if stock biomass falls below the target reference point.

Year	ICES advice	Catch corresponding to advice	Agreed TAC	ICES catch
2018	MAP target F ranges: F_{lower} to F_{upper} (0.19–0.27), but F higher than $F_{MSY} = 0.26$ only under conditions specified in MAP	219 152–301 722, but catch higher than 291 715 only under conditions specified in MAP	304 900**	312 200
2019	MAP target F ranges: F_{lower} to F_{upper} (0.19–0.27), but F higher than $F_{MSY} = 0.26$ only under conditions specified in MAP	225 752–311 523, but catch higher than 301 125 only under conditions specified in MAP	313 100**	317 700
2020	MAP target F ranges: F_{lower} to F_{upper} (0.19–0.27), but F higher than $F_{MSY} = 0.26$ only under conditions specified in MAP	169 965–233 704, but catch higher than 225 786 only under conditions specified in MAP	256 700**	274 100
2021	Management plan	247 952 (range 181 567–316 833)	268 458**	284 900
2022	Management plan	291 745 (range 214 000–373 210)	295 300**	301 409 [^] , [§]
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**	239 888 [^]
2025	Management plan	164 947 (range 130 195 – 169 131)	183 700**	
2026	Management plan	224 616 (range 176 056–230 518)		

* EU autonomous quota and does not include Russian Federation catches.

** TAC is calculated as EU + Russian Federation autonomous quotas.

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

[§] Russian Federation landings were updated in 2024 by the Baltic Fisheries Assessment Working Group (WGBFAS).

Figure 5 - Sprat in subdivisions 22-32 (Baltic Sea) ICES advice, total allowable catches (TACs), and catches. All weights are in tonnes (ICES 2025)

References	
ICES (2025). Sprat (<i>Sprattus sprattus</i>) in subdivisions 22-32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202893.v1	

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>Pass</i>
Rationale	
<p>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 opportunities. (EU 2016)</p> <p>Fishery removals are likely to be prohibited if the stock biomass falls below the limit reference point, and A3.3 is met.</p>	
References	
EU (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. In force. 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 ICES catch advice states that “Spawning-stock size is above MSY $B_{trigger}$, B_{pa} , and	

B_{lim} (ICES 2025). Therefore, the fishery meets the first option of this clause, and A4.1 is met.

SSB

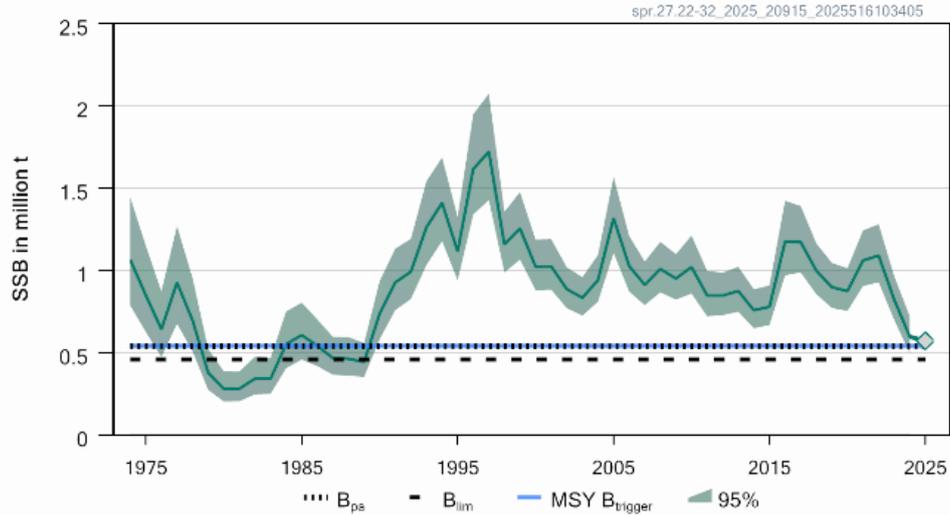


Figure 6 - Sprat in ICES subdivisions 22-32 (Baltic Sea) spawning-stock size above $MSY B_{trigger}$, B_{pa} , and B_{lim} . (ICES 2025)

References

ICES (2025). Sprat (*Sprattus sprattus*) in subdivisions 22-32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202893.v1>

Central Baltic Herring - *Clupea harengus*

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

The EU Fisheries Control System, through the Fisheries Control Regulation (EC Regulation No 1224/2009), requires that each vessel record data on catches (target species and bycatch) in logbooks and complete a landing declaration indicating specifically all quantities of each species landed. Information should be transmitted to the competent authority of each member state, who then provide it to the Commission. (EC 2009).

Russia does not report landing information to ICES; however, the Baltic Fisheries Assessment Working Group (WGBFAS) estimates catches based on information available on the Russian Federation's official websites, providing a comprehensive overview of the fishery removals (ICES 2025a). Uncertainty around the accuracy of this catch data is factored into the stock assessment process.

Total catches in the Central Baltic (excluding Gulf of Riga) of herring in 2024 were 75,236 (ICES 2025b)

Landings data are collected and A1.1 is met.

Catches

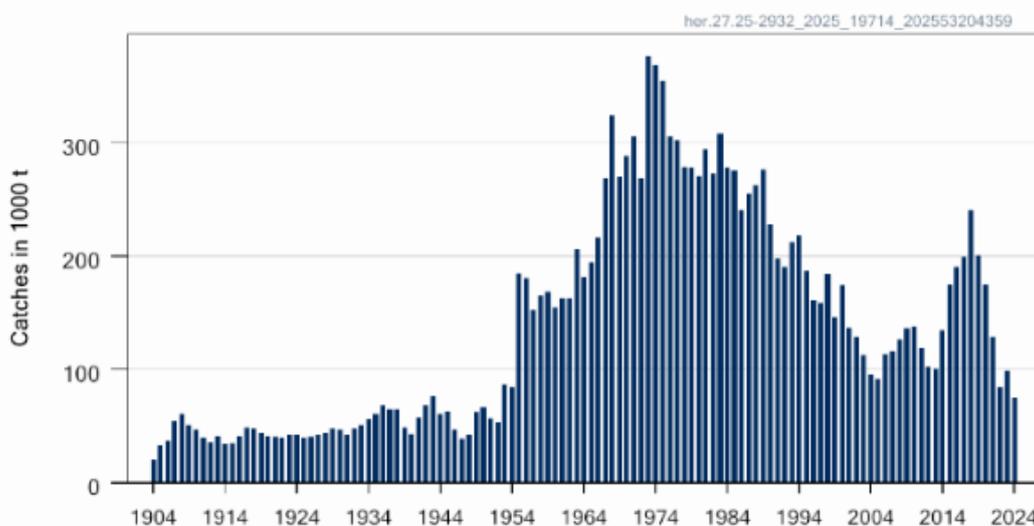


Figure 7 - Herring catches from 1904 to 2024 in ICES subdivisions 25–29 and 32, excluding the Gulf of Riga. (ICES 2025b)

References

EC (2009). Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Union control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No 847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006. In force. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1224-20241011>.

ICES (2025a). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

ICES (2025b). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202617.v1>

A1.2	A1.2 Sufficient additional information is collected to enable an indication of stock status to be estimated.
Outcome	<i>Pass</i>

Rationale

In addition to commercial catch data, the stock assessment carried out annually by the ICES Baltic Fisheries Assessment Working Group (WGBFAS) utilises one acoustic survey indices (the Baltic International Acoustic Survey (BIAS)); and natural mortalities from the ICES multispecies model (ICES 2025a). All fish species in the catch are measured in length, and biological samples, including age, are taken on the target species, herring and sprat. The Baltic Sea countries meet in the Baltic International Fish Survey Working Group (WGBIFS), and the results from each country are compiled in a common database. (SLU 2025, ICES 2024).

The stock assessment model assumes discards and bycatch are negligible. The 2025 catch advice includes a section covering the quality of the assessment, which notes that misreporting of herring and sprat is an ongoing problem which is challenging to quantify, and which introduces an unquantifiable level of uncertainty into the assessment. However, efforts are underway to estimate the levels of misreporting (ICES 2025b). Additionally, there is uncertainty surrounding information on Russian catch composition in recent years, and recruitment in 2024 and 2025 is also uncertain. However, ICES recognises these uncertainties and takes them into account during the stock assessment process.

Overall, sufficient additional information is collected to enable an indication of stock status to be estimated, and A2.1 is met.

References

ICES (2024). Baltic International Fish Survey Working Group (WGBIFS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.25922290.v1>

ICES (2025a). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

ICES (2025b). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202617.v1>

SLU (2025). Sveriges lantbruksuniversitet (Swedish University of agricultural Sciences). BIAS – Baltic International Acoustic Survey. <https://www.slu.se/en/environment/statistics-and-environmental-data/environmental-data-catalogue/bias/>

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	Pass
Rationale	
<p>Herring in the Central Baltic Sea, excluding the Gulf of Riga, is subjected to an annual stock assessment carried out by the ICES Baltic Fisheries Assessment Working Group (WGBFAS). The stock was benchmarked in 2023 (ICES, 2023a), and outcomes were implemented in the last assessment published in 2025 (ICES, 2025). The benchmarking process ensures 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 methodology (ICES 2023b).</p> <p>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 mean weights at age, maturity at age, and natural mortality. Additionally, fishery-independent information from the Baltic International Acoustic Survey (BIAS) was also utilized. (ICES, 2025).</p> <p>An annual stock assessment is conducted and A2.1 is met.</p>	
References	
<p>ICES. (2023a) Benchmark Workshop on Baltic Pelagic stocks (WKBBALTPEL). ICES Scientific Reports. 5:47. https://doi.org/10.17895/ices.pub.23216492</p>	

ICES. (2023b). Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, section 1.1.

<https://doi.org/10.17895/ices.advice.22116890>

ICES (2025). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report.

<https://doi.org/10.17895/ices.pub.29099786.v1>

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	
<p>The WGBFAS stock assessment indicates the status of the stock relative to target and limit reference points. These reference points were updated in 2023 as a result of the full benchmarking of the stock (ICES 2023a), which used to be expressed as absolute values and are now expressed in relative values. Key amongst the reference points for the purpose of this MT assessment are the management plan target reference point $MAP_{MSY} B_{trigger}$, set at B30% (i.e. 30% of the estimated unexploited biomass); and limit reference point $MAP_{B_{lim}}$, set at $0.15 * B_0$ (i.e. 15% of the estimated unexploited biomass) (ICES 2023a).</p> <p>The 2025 stock assessment projected that SSB in 2026 would be 79% of the target reference point level, and stated, “spawning-stock size is below $MSY B_{trigger}$, and between B_{PA} and B_{lim}” (ICES 2025).</p> <p>The assessment provides an indication of stock status relative to reference points, and A2.2 is met.</p>	

Framework	Reference point	Value	Technical basis	Source
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 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}	$F_{B25\%}^{**} = F_{MSY} * 1.21$	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 target range F_{lower}	$F_{B40\%} = F_{MSY} * 0.75$	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 target range F_{upper}	$F_{B25\%}^{**} = F_{MSY} * 1.21$	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)

* B_0 is the estimated unexploited spawning biomass at current conditions (average biological parameters for the last 10 years).

** Determined from the management strategy evaluation. To be precautionary, this reference point can only be used with the MSY $B_{trigger}$.

Figure 8 - Herring in ICES subdivisions 25–29 and 32, excluding the Gulf of Riga, Reference points, values, and their technical basis (ICES 2025a)

Relative Spawning Biomass

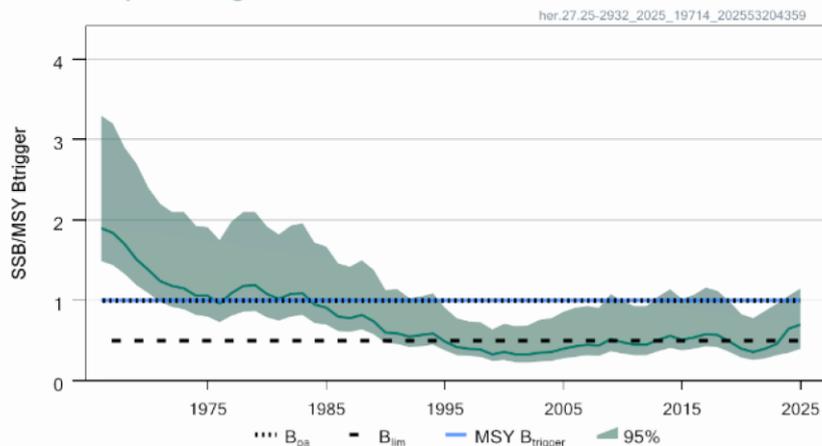


Figure 9 - Central Baltic herring, excluding Gulf of Riga, spawning-stock size is below MSY Btrigger, and between Bpa, and Blim (ICES 2025b)

References

ICES. (2023a) Benchmark Workshop on Baltic Pelagic stocks (WKBBALTPEL). ICES Scientific Reports. 5:47. <https://doi.org/10.17895/ices.pub.23216492>

ICES (2025a). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

ICES (2025b). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202617.v1>

A2.3	A2.3 The assessment provides an indication of the volume of fishery removals which is appropriate for the current stock status.
Outcome	<i>Pass</i>
Rationale	
<p>The ICES advice provides annually an indication of the volume of fishery removals which is appropriate for the current stock status in the form of recommended catches in the upcoming year</p> <p>The latest catch advice indicates that when the EU multiannual plan (MAP) for the Baltic Sea is applied, catches in 2026 that correspond to the F ranges in the plan are between 120,378 (corresponding to $F_{MSY\ lower} \times SSB_{2026}/MSY\ B_{trigger}$) and 157,996 tonnes (corresponding to $F_{MSY} \times SSB_{2026}/MSY\ B_{trigger}$). The fishery for central Baltic herring includes fish from Gulf of Riga herring. The above advice corresponds to catches of herring in subdivisions 25–29 and 32 of no more than 154 542 tonnes (corresponding to $F_{MSY} \times SSB_{2026}/MSY\ B_{trigger}$) in 2026, assuming the same proportion of the Gulf of Riga herring and central Baltic herring stocks is taken in subdivisions 25–29 and 32 as was estimated for 2020–2024 (ICES 2025).</p> <p>The stock assessment provides an indication of an appropriate level of fishery removals, and A2.3 is met.</p>	
References	
<p>ICES (2025). Herring (<i>Clupea harengus</i>) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202617.v1</p>	

A2.4	A2.4 The assessment is subject to internal or external peer review.
Outcome	<i>Pass</i>
Rationale	

The Guide to the ICES Advisory Framework and Principles (ICES 2023) outlines the process by which ICES conducts scientific activities and provides fisheries management advice. When the results of the assessments are agreed by the ICES groups, they are sent to the ICES Advice Drafting Group, which consists of National Experts, who review them, and they are finally reviewed by the Advisory Committee (ACOM), which delivers the ICES advice. The ACOM advice is grounded on 10 principles to support ecosystem-based management advice. 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 question (ICES 2023).

Principle 7 states that the process undergoes a peer review phase 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. (ICES 2023). The sprat stock assessment was most recently benchmarked in 2023; thus, it was subject to peer review (ICES 2025).



Figure 10 - ICES advises principles, Principle 7 states that the process undergoes a peer review phase. (ICES 2023).

The assessment is peer reviewed, and A2.4 is met.

References

ICES. (2023). Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, section 1.1. <https://doi.org/10.17895/ices.advice.22116890>

ICES (2025). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.29099786.v1>

A2.5	A2.5 The assessment is made publicly available.
Outcome	Pass
Rationale All the stock assessment information used to produce this MarinTrust assessment report was	

publicly available. Specifically, information is published in the WGBFAS report (ICES 2023a) and the catch advice (ICES 2025). Additionally, the publication of methodologies, data, deliberations, and outcomes is a core part of the ICES process, as set out by the ICES Advisory Framework and Principles, particularly Principles 4, 5 and 6 (ICES 2023b).

The stock assessment is publicly available, and A2.5 is met.

References

ICES (2023a) Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. 5:58. 606 pp. <https://doi.org/10.17895/ices.pub.23123768>

ICES. (2023b). Guide to ICES advisory framework and principles. In Report of the ICES Advisory Committee, 2023. ICES Advice 2023, section 1.1. <https://doi.org/10.17895/ices.advice.22116890>

ICES (2025). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202617.v1>

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	
<p>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) (EU 2016). 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 resources (FAF 2021).</p> <p>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 total allowable catch (TAC; sum of the EU and Russian Federation autonomous quotas) is set for herring caught in the central Baltic management area; it includes a small amount of Gulf of Riga herring caught in the central Baltic Sea but excludes central Baltic herring caught outside of the central Baltic Sea. (ICES 2025)</p> <p>There is a mechanism in place to restrict total fishing mortality, and A3.1 is met.</p>	
References	
<p>EU (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</p>	

the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007. In force. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R1139-20240710>.

FAF (2021). Federal Agency for Fisheries. Federal Law of 20.12.2004 N 166-FZ "On Fisheries and Conservation of Aquatic Biological Resources" https://fish.gov.ru/wp-content/uploads/documents/documenty/federalnye_zakony/Federalnyj-zakon_166-FZ_ot_20-12-2004.pdf. Translated by Google.

ICES (2025). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202617.v1>

<p>A3.2</p>	<p>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.</p>
<p>Outcome</p>	<p><i>Fail</i></p>
<p>Rationale</p> <p>Since 2018, ICES has provided a range of potential catch recommendations to reflect the specifics of the Baltic Sea MAP (see A2.3). The total international quota – i.e. the sum of the EU TAC and the Russian autonomous quota – has historically been broadly within the boundaries of the ICES advice. However, while the headline 2023 ICES catch advice called for maximum catches within the range of 41,706t – 52,549t, the total international TAC for 2024 was set at 67,368t, nearly 30% greater than the maximum recommended level (ICES 2025).</p> <p>An argument could be made that this excess TAC has only occurred in one year, and therefore does not represent removals which “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. Some scientists and management stakeholders – including, originally, the European Commission (EC 2023) – argued that the TAC should be set to zero.</p> <p>Total fishery removals in 2024 are likely to substantially exceed the range of catch recommendations provided by ICES, and A3.2 is not met.</p>	

Year	ICES advice	Catch corresponding to the advice	Agreed TAC	ICES catch SDs 25–29 and 32	ICES catch
2017	MSY approach ($F_{MSY} = 0.22$)	≤ 216 000	220 629 ^{^^}		199 4281
2018	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 ^{^^}		240 738
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 ^{^^}		200 956
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 173975 only under conditions specified in MAP	182 484 ^{^^}		174 521
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 ^{^^}		75 236 ^{^^^}
2025	Management plan	125 344 (range 95 340–125 344)	110 881 ^{^^}		
2026	Management plan	157 996 (range 120 378 – 157 996)			

* 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.

[§] Russian Federation landings were updated during the Baltic Fisheries Assessment Working Group (WGBFAS) 2024 meeting.

Figure 11 - Herring in subdivisions (SDs) 25–29 and 32, excluding the Gulf of Riga. ICES advice, total allowable catches (TACs), and catches. All weights are in tonnes. (ICES 2025)

References

ICES (2025). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report.

<https://doi.org/10.17895/ices.advice.27202617.v1>

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	<p>The 2023 ICES advice stated that the stock was substantially below the LRP; noted that the MAP requires fishing pressure to be set at a level which reduces the chance of SSB falling below LRP to less than 5%; and stated that the stock will likely remain under LRP even with zero fishing in 2024. However, despite this, the ICES headline catch advice recommended a quota of between 41,706t and 52,549t (ICES 2023), although text included within the advice also noted that “The EU MAP states, “Fishing opportunities shall in any event be fixed in such a way as to ensure that there is less than a 5% probability of the spawning stock biomass falling below B_{lim}”” (ICES 2023).</p> <p>Due to the state of the stock, in August 2023 the European Commission proposed the closure of the targeted central Baltic herring fishery (EC 2023). However, this proposal was not implemented, and the 2024 TAC was eventually set at 40,368t (EC 2023a). The 2024 ICES advice indicates that when combined with the Russian Federation autonomous quota, the total international TAC in 2024 was 67,368t.</p> <p>In conclusion, despite biomass being below the LRP, the 2024 TAC was set substantially higher than the level recommended by ICES. A3.3 is not met.</p>
References	<p>ICES (2023) Herring (<i>Clupea harengus</i>) 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</p> <p>ICES (2024). Herring (<i>Clupea harengus</i>) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019276.v1</p>

A4 Stock status

A4.1	<p>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.</p>
Outcome	<i>Fail</i>
Rationale	<p>The stock is currently estimated to be above the limit reference point (B_{lim}) but below the target reference points B_{pa} and $MSY B_{trigger}$ (ICES 2025), therefore the first and third statements of this clause are not met.</p>

In order to meet the second statement, there must be evidence that a fall below the limit reference point would result in fishery closure. The 2023 stock assessment concluded that stock biomass was below the limit reference point level (ICES 2023). However, the fishery remained open in 2024, with a total international TAC of 67,368t, nearly 30% more than the maximum recommended by the ICES advice (52,549t). There is conclusive evidence that the fishery is not closed when biomass falls below the limit reference point, and the second statement is not met.

A4.1 is not met. As per the MT whole fish assessment guidance, the stock has been further assessed under Category B.

References

ICES (2023). Herring (*Clupea harengus*) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). Replacing advice provided in May 2023. ICES Advice: Recurrent Advice.

Report. <https://doi.org/10.17895/ices.advice.23310368.v1>

ICES (2025). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report.

<https://doi.org/10.17895/ices.advice.27202617.v1>

Category B species

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

- 1.1. 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.
- 1.2. The risk matrix in Table B(b) shall be used when assessing a Category B species when no reference points are available.

Central Baltic Herring - *Clupea harengus*

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	<i>Pass</i>
<p>Rationale</p> <p>Central Baltic herring is managed relative to established target and limit reference points, but fails in Category A assessment; thus information about biomass, fishing mortality, and reference points is available and 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} (ICES 2025)</p> <p>Taking into account current estimates of biomass and fishing mortality relative to reference points, and reading off Table B(a), the outcome is that the stock Passes the Category B assessment.</p>	

Table B(a) – Biomass/fishing pressure risk assessment.

	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

Figure 12 - Table B(a) risk matrix. In green squares, results for Central Baltic herring are shown.

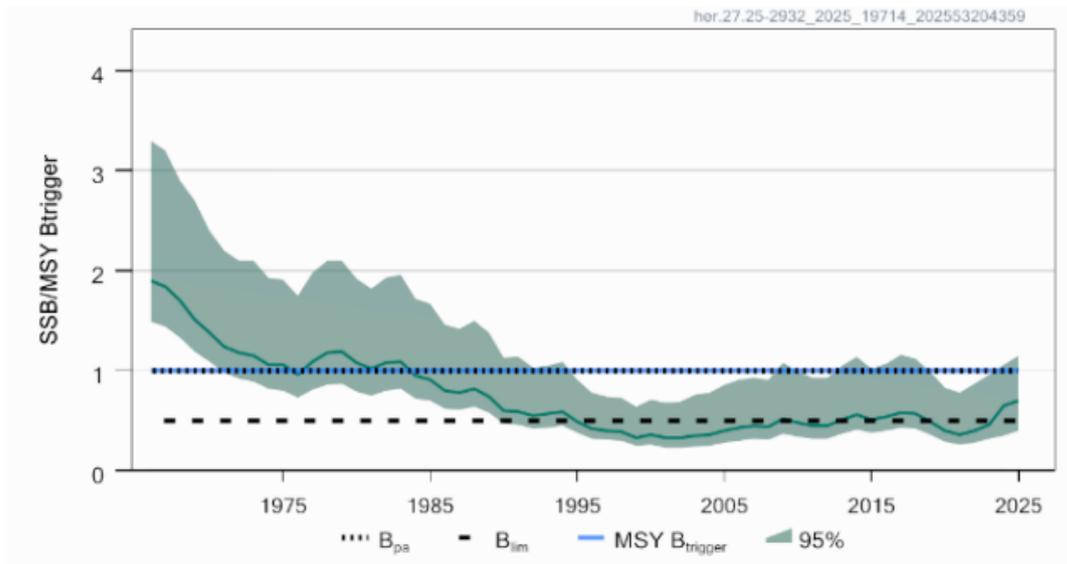


Figure 13 - Central Baltic herring, relative spawning biomass and current reference points (ICES 2025)

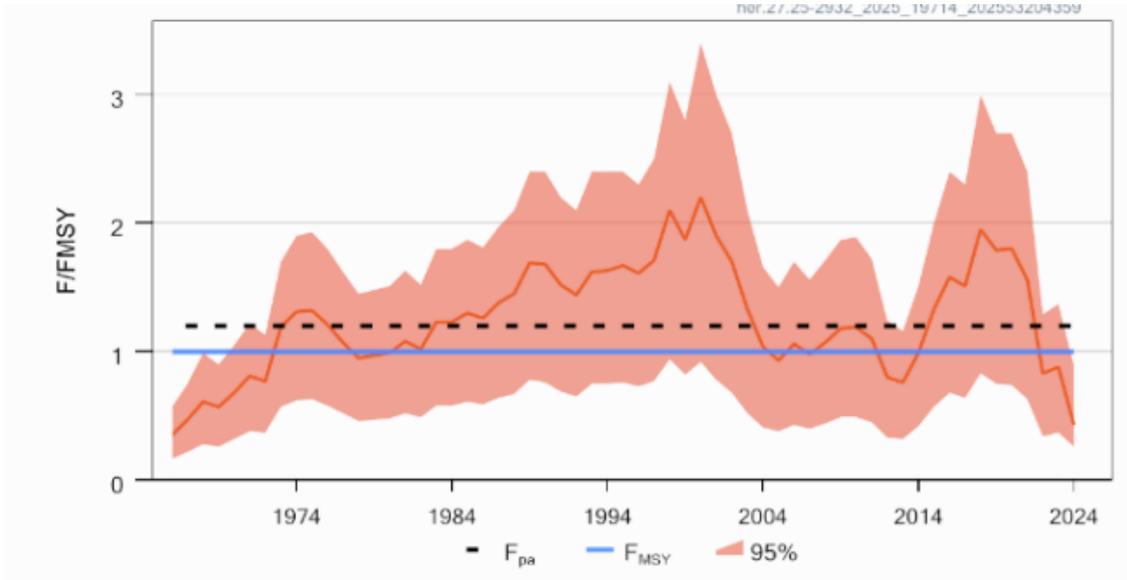


Figure 14 - Central Baltic herring, relative fishing pressure (ICES 2025)

References

ICES (2025). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report.

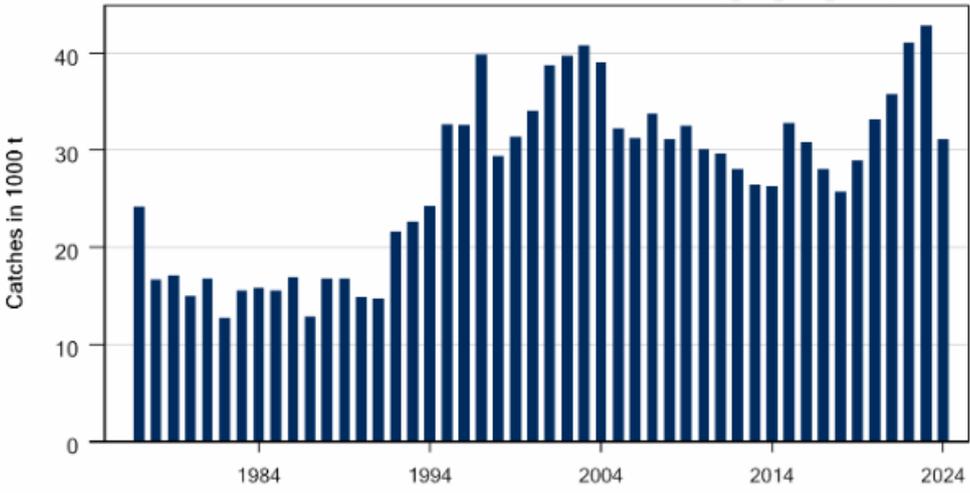
<https://doi.org/10.17895/ices.advice.27202617.v1>

Category C species

2.2. All clauses must be met for a species to pass the Category C assessment.

2.2.1. 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.

Gulf of Riga Herring - *Clupea harengus*

<p>C1.1</p>	<p>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.</p>
<p>Outcome</p>	<p>Pass</p>
<p>Rationale</p> <p>Gulf of Riga herring stock (ICES subdivision 28.1) most recent assessment was published in May 2025 by The International Council for exploration of the Sea (ICES) Baltic Fisheries Assessment Working Group (WGBFAS). The assessment was carried out using an age-based analytical assessment SAM that uses catches in the model and the forecast (Figure 15) (ICES 2025).</p> <div data-bbox="288 1093 1289 1653"> <p>Catches</p>  <p>Figure 15 - Gulf of Riga herring catches in the Gulf of Riga (ICES subdivision 28.1) 1977-2024. (ICES 2025).</p> </div>	
<p>References</p> <p>ICES (2025). Herring (<i>Clupea harengus</i>) in Subdivision 28.1 (Gulf of Riga). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202620.v1</p>	

<p>C1.2</p>	<p>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.</p>
<p>Outcome</p>	<p>Pass</p>
<p>Rationale</p> <p>The Gulf of Riga herring stock assessment indicates that spawning-stock size is above MSY $B_{trigger}$, B_{lim} and B_{PA} (Figure 16). Therefore, ICES advises that when the EU multiannual plan (MAP) for the Baltic Sea is applied, the catches in 2026 that correspond to the F ranges in the plan are between 23,962 tonnes and 35,643 tonnes. (ICES 2025).</p> <div data-bbox="311 801 1257 1355" data-label="Figure"> </div> <p>Figure 16 - Gulf of Riga herring spawning biomass (ICES subdivision 28.1) (ICES 2025)</p>	
<p>References</p> <p>ICES (2025). Herring (<i>Clupea harengus</i>) in Subdivision 28.1 (Gulf of Riga). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.27202620.v1</p>	



Category D species

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

- 2.3. The Productivity-Susceptibility Analysis (PSA) in Table D(a) shall be used when assessing Category D species.
- 2.4. Table D(b) shall be used to calculate the overall PSA risk rating for the Category D species.
- 2.5. 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	Smelt (<i>Osmerus eperlanus</i>)	
Productivity attributes	Value	Score
Average age at maturity	4.7 years	1
Average maximum age	18.9 years	2
Fecundity	18,028	2
Average maximum size	45cm	1
Average size at maturity	22.1cm	1
Reproductive strategy	Broadcast spawner	1
Mean Trophic Level (MTL)	3.5	3
Density dependence (to be used when scoring invertebrate species only)	n/a	
Susceptibility attributes		
Areal overlap (availability): Overlap of the fishing effort with a species concentration of the stock	<10%	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	Unknown; assumed High	3
Selectivity of gear type: Potential of the gear to retain species	Unknown; assumed High	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	Retained	3
Average productivity score		1.57
Average susceptibility score		2.5
PSA risk rating (from Table D(b))		PASS
Compliance rating		PASS

Reference: Fishbase, European smelt: <https://www.fishbase.se/summary/Osmerus-eperlanus.html>

Species name	Vendace (<i>Coregonus Albula</i>)	
Productivity attributes	Value	Score
Average age at maturity	2.3 years	1
Average maximum age	8.9 years	1
Fecundity	5,704	2
Average maximum size	48cm	1
Average size at maturity	17.5cm	1
Reproductive strategy	Broadcast spawner	1
Mean Trophic Level (MTL)	3.1	2
Density dependence (to be used when scoring invertebrate species only)	n/a	
Susceptibility attributes		
Areal overlap (availability): Overlap of the fishing effort with a species concentration of the stock	<10%	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	Unknown; assumed High	3
Selectivity of gear type: Potential of the gear to retain species	Unknown; assumed High	3
Post-capture mortality (PCM): The chance that, if captured, a	Retained	3

species would be released and that it would be in a condition permitting subsequent survival		
Average productivity score		1.29
Average susceptibility score		2.5
PSA risk rating (from Table D(b))		PASS
Compliance rating		PASS

Reference: Fishbase, vendace: <https://www.fishbase.se/summary/Coregonus-albula>

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)

There have been no substantial changes in this section since the initial assessment.

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	
<p>There is a requirement for EU member states to record ETP bycatch initially through Council Regulation (EC) 812/2004 (which was focused on cetaceans, although member states also provided information on other species) and from 2019 through the technical Conservation Measures Regulation (EU Regulation 2019/1241) (Annex XIII sets out monitoring requirements for marine mammals, reptiles and seabirds) and the Habitats and Birds Directives (1992/43/EC) also require monitoring of bycatch of species protected under the Directives. Information collected through these mechanisms is collated and assessed by the ICES WGBYC (ICES 2023).</p> <p>Interactions with ETP species are considered very rare. The most recent WGBYC report indicates that pelagic gears in the Baltic Sea reported no interactions with sharks, seabirds or turtles in 2022 (ICES 2023). Previously, the WGBYC has assessed the bycatch risk posed by different fishing gears to protected species in the Baltic Seas using expert judgement. Each combination of protected</p>	

species and gear type was assigned a simple 1 to 3 (lower-higher risk) score. Pelagic trawls were scored at '1', except for seals and harbour porpoise which were scored at '2' based on a record from Poland of one porpoise bycatch from a pelagic trawl (ICES 2018).

Information on interactions between the fishery and ETP species is collected, and E1.1 is met.

References

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31992L0043>

Council Regulation (EC) No 812/2004 of 26.4.2004 laying down measures concerning incidental catches of cetaceans in fisheries and amending Regulation (EC) No 88/98. <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32004R0812>

ICES, 2018. Report from the Working Group on Bycatch of Protected Species (WGBYC), 1–4 May 2018, Reykjavik, Iceland. ICES CM 2018/ACOM:25. 128 pp [https://www.ascobans.org/sites/default/files/document/AC24 Inf. 2.1.b ICES%20WGBYC.pdf](https://www.ascobans.org/sites/default/files/document/AC24%20Inf.%202.1.b%20ICES%20WGBYC.pdf)

ICES (2023). Working Group on Bycatch of Protected Species (WGBYC). ICES Scientific Reports. Report. <https://doi.org/10.17895/ices.pub.24659484.v3>

Regulation (EU) 2019/1241 of the European Parliament and of the Council of 20 June 2019 on the conservation of fisheries resources and the protection of marine ecosystems through technical measures. https://eur-lex.europa.eu/eli/reg/2019/1241/art_2/oj

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	
As noted in E1.1, the most recent WGBYC report (ICES 2023) indicates that interactions between this fishery and ETP species are thought to be very rare. E1.2 is met.	
References	
ICES (2023). Working Group on Bycatch of Protected Species (WGBYC). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.24659484.v3	

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>
	<p>E1.3.1 There are measures applied to the fishery which are designed to manage the impacts of the fishery on ETP species.</p> <p>E1.3.2 The measures are considered likely to achieve the objectives of regional, national and international legislation relating to ETP species.</p>
Outcome	<i>Pass</i>
Rationale	
<p>Although interactions between this fishery and ETP species are thought to be extremely rare, measures are in place to minimise mortality. These include area closures (e.g. offshore from the mouth of the Oder), ban on fishing in inshore areas in certain locations, monitoring requirements, marine protected areas designated for ETP species, and ban on capture of ETP species and, where this occurs, their prompt release.</p> <p>No fishery-specific strategy is required for this fishery due to the infrequency of ETP interactions; however, broader ETP measures are in place. E1.3 is met.</p>	
References	
n/a	

E2 Impact on the habitat

There have been no substantial changes in this section since the initial assessment.

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	
<p>Due to the gears used, this pelagic fishery is inherently very unlikely to significantly impact any marine habitats, and there are no habitats likely to be directly affected by this fishery. Pelagic gears operate in the water column and fishers make efforts to avoid contact with the bottom, which can damage the gear. However, in fisheries within EU waters where habitat impacts are likely – for example bottom trawl fisheries – efforts have been made to understand those impacts, such as through the European Marine Observation and Data Network (EMODnet 2024).</p> <p>Fishing activity within the small pelagic fishery is very unlikely to have any impact on marine habitats; however, the locations of vessels and fishing activity is monitored via VMS. Due to the gears used, data do not need to be collected to indicate that the fishery does not have an impact on habitats. Data are collected, and E2.1 is met.</p>	
References	
EMODnet(2024). Seabed habitats: https://emodnet.ec.europa.eu/en/seabed-habitats	

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	<i>Pass</i>
Rationale	

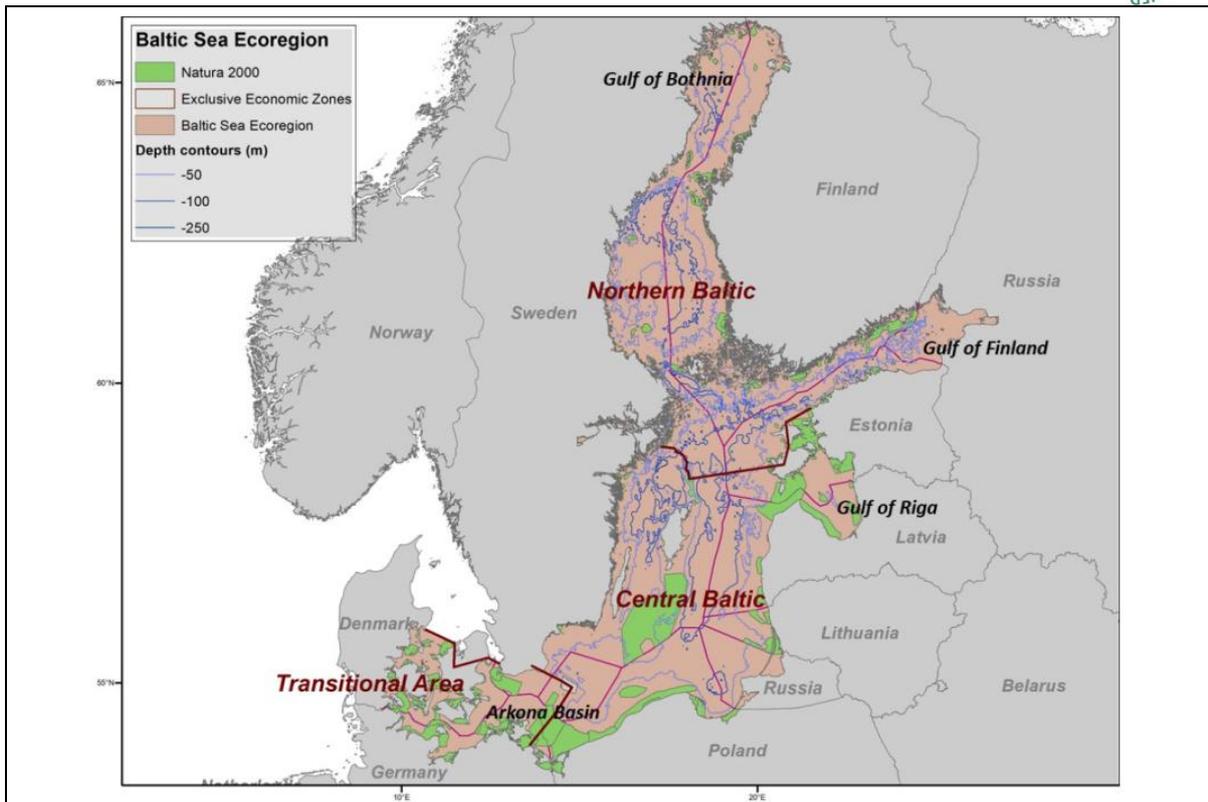
As noted above, due to the gear types used in this fishery, it is very unlikely to have a significant negative impact on marine habitats. E2.2 is met.
References n/a

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	<i>Pass</i>
Rationale Due to the pelagic nature of the gears used in this fishery, no habitat management strategy is necessary. No measures are required to reduce the potential impacts of the fishery on marine habitats, as these are likely to be zero due to the gear types used. E2.3 is met.	
References n/a	

E3 Impact on the ecosystem

There have been no substantial changes in this section since the initial assessment.

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	<i>Pass</i>
Rationale <p>Commercial fisheries in the Baltic Sea are managed according to a Multi-Annual Plan (MAP), EU Regulation 2016/1139. The objectives of the MAP include implementing the ecosystem-based approach to fisheries management, the precautionary approach, and EU legislation including the Marine Strategy Framework Directive (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”.</p> <p>The regular management advice published by ICES includes an ecoregion overview for the Baltic Sea (ICES, 2022), which summarises the most up to date understanding of the Baltic ecosystem and the ways in which this knowledge influences the management advice. These include noting the likely current and future impacts of climate change, and the shifts in the food web which have occurred since the late 1980s.</p>	



The ICES Baltic Sea ecoregion, showing EEZs and larger Natura 200 sites (ICES 2022)

Key ecosystem aspects identified at the regional level by the Baltic Sea ecoregion overview include:

- Nutrient inputs have decreased but are still above regional goals, and levels of nutrients in the water column and sediments remain high.
- Many deep-water areas have poor or no oxygen.
- Climate-driven changes to water temperature and salinity are likely to have an increasing influence on the Baltic Sea ecosystem.
- There have been shifts in the structure of the food web over the past few decades, including changes to phytoplankton and zooplankton communities; changes in coastal fish communities including an increase in carp and decrease in piscivorous species; changes in seabird populations, including a decline of species feeding on the benthos and an increase in those eating sprat and herring.

In addition to the over-arching consideration afforded to ecosystems at the Baltic Sea level, the specific roles of herring and sprat in the Baltic Sea ecosystem factors in to the development of the stock assessment process. The objectives of the 2023 benchmarking workshop, which aimed to update the stock assessment methodology, were set in advance, and included the following:

“As part of the assessment methods workshop, knowledge about environmental drivers, including multispecies interactions, and ecosystem impacts should be integrated in the methodology” (ICES 2023).

The benchmarking workshop report provides evidence that ecosystem knowledge was indeed factored into discussions. The herring section includes an extensive discussion of “Ecosystem

drivers” (ICES 2023). Further consideration is given to herring and sprat specifically in the annual WGBFAS workshop and reports. In the case of sprat, there are ongoing efforts to “develop an F scaling factor...to tune the long-term F_{MSY} and...account for medium-term ecosystem-driven variability in productivity” (ICES 2023a).

The broader ecosystem is considered during the management decision-making process, and E3.1 is met.

References

ICES (2022). Baltic Sea Ecoregion – Ecosystem overview. In Report of the ICES Advisory Committee, 2022. ICES Advice 2022, Section 4.1, <https://doi.org/10.17895/ices.advice.21725438>

ICES (2023). Benchmark Workshop on Baltic Pelagic stocks (WKBALPEL). ICES Scientific Reports. 5:47. 350 pp. <https://doi.org/10.17895/ices.pub.23216492>

ICES (2023a). Baltic Fisheries Assessment Working Group (WGBFAS). ICES Scientific Reports. 5:58. 606 pp. <https://doi.org/10.17895/ices.pub.23123768>

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	<i>Pass</i>
Rationale	
<p>The most significant potential ecosystem impacts of the fishery arise from the removal of herring and sprat biomass. The ICES ecosystem overview (ICES, 2022) states that since the late 1980’s “the open-sea system has been dominated by small pelagic fish, such as sprat”, and that “in general, those seabird species eating sprat and herring have increased in number”. Prey depletion is not considered to be a determining factor in the health of populations of porpoise, seal or cod populations, all of which predate sprat and herring (ICES 2022). Additionally, the ICES catch recommendations – which as noted in Section A are broadly followed – are calculated with the ecosystem considerations listed in F3.1, above. No other evidence was encountered during the completion of this report to indicate that the fishery has a significant negative impact on the marine ecosystem, and E3.2 is met.</p>	
References	
<p>ICES (2022). Baltic Sea Ecoregion – Ecosystem overview. In Report of the ICES Advisory Committee, 2022. ICES Advice 2022, Section 4.1, https://doi.org/10.17895/ices.advice.21725438</p>	

ICES (2024). Sprat (*Sprattus sprattus*) in subdivisions 22–32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.25019687.v1>

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/legal-content/en/TXT/?uri=CELEX:32016R1139>

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>
	<p>E3.3.1 There are measures applied to the fishery which are designed to manage the impacts of the fishery on marine ecosystems.</p> <p>E3.3.2 The measures are considered likely to prevent the fishery from having a significant negative impact on marine ecosystems.</p>
Outcome	<i>Pass</i>
Rationale	
<p>Herring and sprat are both considered to be important prey species in the Baltic Sea ecosystem. Natural mortality – primarily due to predation – is factored in to the ICES quota recommendations. Natural mortality levels are estimated for sprat and herring as part of the stock assessment process, using a multispecies assessment model (ICES 2024, 2024a). This means that catch recommendations are lower than they would be if natural mortality was not considered, and therefore catches are more conservative due to the important role played by both prey species. E3.3 is met.</p>	
References	
<p>ICES (2024). Sprat (<i>Sprattus sprattus</i>) in subdivisions 22–32 (Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019687.v1</p> <p>ICES (2024). Herring (<i>Clupea harengus</i>) in subdivisions 25–29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019276.v1</p>	

Annex 1: External Peer Review report

Assessment and determination summary

Fishery name	Finland - <i>Clupea harengus</i> - Herring and <i>Sprattus sprattus</i> - Sprat - FAO 27, ICES 3.d.25-29, 32 (Central Baltic Sea, excl. Gulf of Riga)
MarinTrust report code	WF40
Type 1 species (common name, Latin name)	Herring, <i>Clupea harengus</i> Sprat, <i>Sprattus sprattus</i>
Fishery location	FAO 27, ICES 3.d.25-29, 32 (Central Baltic Sea, excl. Gulf of Riga)
Gear type(s)	Pelagic trawls
Management authority (country/state)	European Commission; Finland
Certification Body recommendation	Approved
FAPRG reviewer recommendation	Agree with CB determination

Summary of peer review outcomes

<p>Summary</p> <p><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></p> <p>The first surveillance of the Finnish herring and sprat fishery in the Baltic Sea (excluding the Gulf of Riga) found no major changes since the initial whole fishery assessment, though catch composition shifted, with sprat falling to 13.5% of the 2024 catch and herring, mainly from the Central Baltic stock, remaining the primary species. As before, the fishery contains two Type 1 stocks (sprat and central herring), with Gulf of Riga herring classified as Type 2, along with smelt and vendace. Baltic sprat meets Category A requirements, gulf of Riga herring meets Category C, smelt and vendace meet Category D requirements. Central Baltic herring fails A3 and A4, but meets Category B requirements. Finally, the fishery continues to operate within a legal, scientific and enforcement framework that satisfies Sections M and E. In conclusion; the peer reviewer agrees with CB assessment.</p>
<p>General comments on the draft report provided to the peer reviewer</p> <p>The report is well-written, and justifications are provided throughout to support scoring decisions. There are other MT Baltic herring assessments which have gone through peer review and this report is clearly harmonised across existing assessments. References are provided which are relevant and current to the fishery under assessment, most links are working except for - M2.2 where the link generates a 404 page not found</p>

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 best current understanding of the catch composition of the fishery?	Yes
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	n/a
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
Yes, the scoring within the report is consistent with the Marin Trust V3 standard for whole fishery assessment. The report is well-written, with references, accessible web links, and relevant figures and tables provided throughout to support scoring. Please check M2.2 reference web link which generates a 404 page not found	
Certification Body response	
Broken link has been updated	

2. Does the species categorisation section of the report reflect the best current understanding of the catch composition of the fishery?	Yes
The species categoriations looks accurate and uses up-to-date sources for finnish fishing vessels operating in the baltic. However, please clarrify however where gulf of riga	

herring is confirmed to be 0-1% of the catch; is this from the STECF data or the stock assessment information? If the later please reference the report and update the rationale.
Certification Body response
The 0-1% figure is from the ICES catch advice; the categorisation section has been updated to make this clear and provide a reference.

3. Is the scoring of the fishery consistent with the MarinTrust requirements, and clearly based on the evidence presented in the assessment report?	Yes
It is apparent that the Marin Trust whole fishery v3 assessment methodology and associated guidance have been followed.	
Certification Body response	
n/a	

3a. Are the "Category A Species" scores clearly justified?	Yes
The section is well-written, and justifications are provided throughout to support scoring descions. References are provided which are relevant and current to the stocks under assessment. Both stocks meet MarinTrust requirements for data collection, assessment quality, and harvest control, with fishing mortality regulated through TACs based on the EU Baltic Sea Multiannual Plan. Sprat is in good condition, with spawning biomass above all reference points and catches generally aligned with ICES advice. Central Baltic herring is below its target reference point but above the limit reference point, bug historically, catches have not alligned with the recommended TAC. Therefore, Sprat meetings the Catergory A requirements but Central baltic herring does not and is further assessed as a catergory B species.	
Certification Body response	
n/a	

3b. Are the "Category B Species" scores clearly justified?	Yes
Central Baltic Herring, failed some Catergory A clauses and therefore assessed against category B. The stock is between Bpa and Blim and therefore meets the CatB clause.	
Certification Body response	
n/a	

3c. Are the “Category C Species” scores clearly justified?	n/a
Certification Body response	

3d. Are the “Category D Species” scores clearly justified?	Yes
Smelt and Vendace Category D scoring is sufficient to pass MT requirements. A reference to fishbase is provided for biological traits and species distribution.	
Certification Body response	
n/a	

Are the scores in “Section M – Management Requirements” clearly justified?	Yes
<p>The management scoring is very detailed and references are provided throughout. Both the Finnish and EU management systems are scored.</p> <p>For "M2.3 There is substantial evidence of widespread compliance in the fishery, and no substantial evidence of IUU fishing." - there are more recent reports on non-compliance so just wondering why these weren't used? most recent is for 2025.</p> <p>https://www.efca.europa.eu/sites/default/files/2025-10/3M-2025-WEB%20report-JDP-BS.pdf</p>	
Certification Body response	
Section has been updated to reference more recent reports	

Are the scores in “Section E – Ecosystem Impacts” clearly justified?	Yes
This fishery is well managed in terms of its impacts on ETP and ecosystems. The gear type, pelagic trawl, doesn't interact with the seabed so habitat management is minimised. Scoring is well presented and referenced throughout.	
Certification Body response	
n/a	

Optional: General peer reviewer comments on the draft report

Certification Body response