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NOTE

From:	General Secretariat of the Council
To:	Delegations
N° prev. doc.:	ST 12253/25 + ADD1
Subject:	Proposal for a COUNCIL REGULATION fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2026 and amending Regulation (EU) 2025/202 as regards certain fishing opportunities in other waters - Additional information from Germany and Poland

Delegations will find attached additional information from Germany and Poland on the abovementioned proposal.



your References

our References

Date
2025-10-19

Statement on the Commission's proposal to close recreational salmon fishing in the Baltic Sea south of the Åland Sea (ICES SD22–29S) in 2026

Prepared by: [REDACTED]

Reason

As in the previous year, the Commission proposes to completely ban marine recreational fishing (trolling) for salmon (*Salmo salar*) in the Baltic Sea south of the Åland Sea (ICES SD22–29S) in 2026 (COM(2025)458). This would abolish the current regulation, which allows the harvest of one hatchery-reared salmon (without adipose fin) per day and per angler, and marine recreational salmon fishing in this area would have to cease entirely. In this statement, the Thünen Institute of Baltic Sea Fisheries seeks to compile all relevant information for the Council's decision and to provide a well-founded assessment of the situation.

Summary

- Most wild Baltic salmon stocks show long-term positive developments, but five of the 29 river stocks assessed by ICES are currently classified as being in a very poor condition ($< R_{lim}$), all belonging to Assessment Unit (AU) 5.
- The ICES advice recommends coastal catches of up to 30,000 salmon for 2026 in the Gulf of Bothnia and the Åland Sea (SD 29N–31) during the summer spawning migration, as well as zero catches in commercial and recreational fisheries in the remaining Baltic Sea.
- This year's Commission proposal follows the ICES advice and foresees the closure of marine recreational salmon fishing south of the Åland Sea (SD 22–29S) in 2026. The coastal areas within SD 29N–31 are exempt from this rule during the salmon spawning migration in summer.
- Recreational trolling for salmon in the Baltic Sea is of great cultural, social, and economic importance in Germany and other Baltic coastal states, particularly for some coastal communities such as Rügen (DE), Bornholm (DK), and along the southern coast of Sweden.

- In 2022, a new regulation to protect wild salmon stocks in the recreational trolling fishery was introduced: a bag limit of one salmon (stocked salmon only, identifiable by a clipped adipose fin) per angler and day applies. All wild salmon must be released without exception.
- Since the introduction of this regulation, both fishing effort and landings in recreational trolling for salmon have declined sharply in Germany (fishing effort –60%; landings –86% in 2024) and across the Baltic Sea (landings –77% in 2024).
- Until now, the ICES stock assessment assumed a post-release mortality of 25% in the recreational trolling fishery. Preliminary results from a study conducted by the Thünen Institute and the Swedish University of Agricultural Sciences (SLU), however, indicate that post-release mortality is significantly lower (< 13.8%). The current regulation in the recreational fishery therefore aligns with the management objective (protection of weak wild salmon stocks).
- Since 2024, the Thünen Institute has been conducting genetic analyses of salmon caught in the German recreational trolling fishery in the southern Baltic Sea. So far, no fish from populations of Assessment Unit 5 have been detected in these catches. All river stocks in poor condition belong to this AU.
- The Thünen Institute therefore proposes maintaining (“rollover”) the current regulation in the marine recreational trolling fishery as the best compromise between preserving cultural and socio-economic values and protecting weak wild salmon stocks in the Baltic Sea.

Statement

Background and stock status

The salmon (*Salmo salar*) in the Baltic Sea (ICES SD 22–31, excluding the Gulf of Finland (SD 32)) originate from 58 different rivers, 29 of which are assessed annually by ICES. For 17 of these rivers, a fully analytical assessment is conducted (ICES, 2025a,b). The individual river populations are grouped into five so-called Assessment Units (AUs) (see Fig. 1; ICES, 2025a).

In 2024, the total production of wild juvenile salmon (smolts) in the Baltic catchment area was approximately 2.9 million individuals, corresponding to about 85% of the estimated Potential Smolt Production Capacity (PSPC). In addition, around 3.5 million hatchery-reared smolts were released into the Baltic Sea and its tributaries in 2024 (ICES, 2025b). These stocked salmon are often marked by removal of the adipose fin, allowing for a distinction between hatchery-reared and wild salmon. The four rivers in AU 1 account for roughly 80% of the overall wild smolt production in the Baltic Sea (ICES, 2025b). Although smolt production in AUs 1–4 has increased up to tenfold over the past decades, the number of returning spawners has remained stable or slightly declined in some rivers in recent years. The main reason for this is that the survival rate of wild post-smolts has dropped from 10–20% to the lowest value in the time series (6%) in 2021 and has since remained at a relatively low level of about 10% (ICES, 2025c).

Despite these circumstances, 15 of the 17 river stocks in AUs 1–4 still have a probability of more than 50% of being at or above the reference point R_{MSY} in 2024 (ICES, 2025c). For the river stocks in AU 5, no analytical assessment is available, but the smolt production in most wild salmon rivers is well below R_{lim} . Of the 12 river stocks in AU 5, seven are classified as “wild” and five as “mixed” (rivers with both stocked and wild salmon; ICES, 2025c). Only in the Salaca and Saka rivers (both in Latvia) is wild smolt production in 2024 expected to meet R_{lim} . Thus, five of the total 27 wild salmon stocks assessed by ICES in the Baltic Sea are in very poor condition (ICES, 2025c).

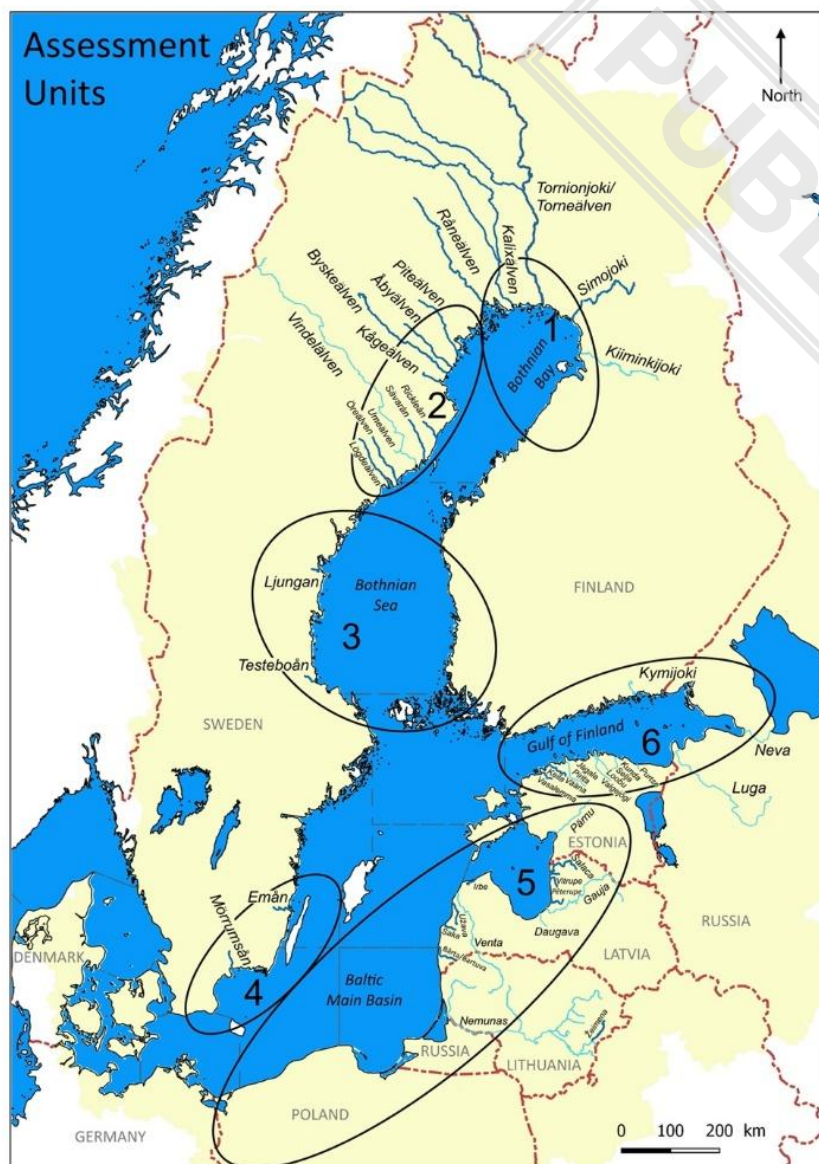


Fig. 1: Map showing the stock units (Assessment Units – AUs) for Baltic Sea salmon. Source: ICES, 2025a.

To protect the weak salmon stocks in AU 5, ICES has recommended since 2021 that no salmon should be caught in the mixed marine fishery (commercial and recreational) south of the Åland Sea (ICES SD22–29S). Therefore, since 2022, targeted commercial salmon fishing has been banned, and recreational fishing has been restricted by a bag limit of one salmon (stocked salmon only, identifiable by a clipped adipose fin) per angler and per day (EU, 2021).

There are indications that measures to reduce fishing mortality at sea have had positive effects on the recruitment of AU 5 stocks. At the same time, ICES points out that even with a complete closure of all fisheries, recovery of the weak AU 5 stocks will take a very long time and may not be achievable at all (ICES, 2025b). In addition to marine fisheries, various environmental and anthropogenic factors affecting salmon during their freshwater phase (fishing in rivers and coastal areas, destruction of river habitats, pollution from agriculture and industry, river engineering, migration barriers, and in some cases poaching) are also believed to have negative effects on the development of AU 5 stocks (ICES, 2025b). Measures to improve river habitats and connectivity at the national level are therefore essential to strengthen the weak

populations and increase the number of spawners. Closing the fishery alone will not be sufficient (ICES, 2025b).

This year's ICES advice recommends zero catches of salmon in the marine fishery (both commercial and recreational) targeting the mixed stocks south of the Åland Sea (ICES SD22–29S) for 2026, and a catch limit of no more than 30,000 salmon in the coastal fishery of the Gulf of Bothnia and the Åland Sea (SD29N–31) during the spawning migration period (1 May–31 August). This exception in the northern area is possible because genetic studies have shown that no salmon from AU 5 are caught in that region (ICES, 2025b,c). The Commission's 2025 proposal (COM(2025)458) for setting Baltic Sea salmon fishing opportunities follows the ICES advice.

Social, cultural and economic importance of recreational salmon trolling

In the southern and central Baltic Sea (ICES SD 22–28), salmon and the associated marine recreational fishery have significant tourism and socio-economic importance (Weltersbach et al., in prep.; Karlsson, 2025). In this region, salmon are almost exclusively caught by trolling in the open Baltic Sea during autumn, winter, and spring (October to the end of May). In Germany, salmon trolling takes place exclusively around the island of Rügen (ICES SD 24) in winter and spring (Weltersbach et al., 2021).

Regular data collection conducted in Germany since 2016 (Weltersbach et al., 2024) shows that each salmon angler spends an average €2,750 per year on salmon trolling in the Rügen area. This corresponded to total annual expenditures of approximately €5 million in 2019, or about €1,000 per harvested salmon (Thünen Institute, unpublished data). A recent study conducted by the Thünen Institute of Baltic Sea Fisheries, the Technical University of Denmark (DTU Aqua), and the University of Southern Denmark (SDU) among 402 German and Danish salmon trolling anglers found even higher expenditure levels—averaging around €4,749 per German and €3,849 per Danish salmon trolling angler per year in the Baltic Sea (Weltersbach et al., in prep.). A substantial share of these expenditures (e.g., for transportation, accommodation, and food/gastronomy) benefits the local economies of coastal communities, particularly during the off-season (Strehlow et al., 2023). For example, salmon anglers visiting Rügen travel from all over Germany as well as from other European countries (Lewin et al., 2021). Especially, as commercial fishing for herring and cod is currently limited or closed, angling tourism associated with salmon trolling provides an additional source of income for residents and communities in coastal regions (Strehlow et al., 2023).

The introduction of the bag limit of one adipose fin-clipped salmon per day and angler in the southern and central Baltic Sea (ICES SD22–29S) in 2022 (EU, 2021) was a drastic step and had significant effects on angler behavior, resulting in substantial economic consequences for the recreational trolling fishery in Germany and other Baltic coastal states. After the introduction of the new regulation in 2022, angling effort in Germany's salmon trolling fishery declined sharply—by about 60% compared with the 2017–2019 period—leading to negative economic impacts for the region (Weltersbach et al., 2024). Similarly, salmon catches decreased from approximately 4,500–5,500 salmon in 2017–2019 to only about 300 salmon in 2023 (–94%) and around 700 salmon in 2024 (–86%). Across the Baltic Sea, landings from the recreational trolling fishery declined by 77% between 2019 and 2024 (ICES, 2025b). Professional operators of guided salmon fishing tours have been particularly affected and are under economic pressure due to the loss of this important source of income. Many operators have already closed their businesses. At the same time, as a result of the adipose fin clip rule, the release rate in the German salmon trolling fishery increased from <10% (2019–2021) to nearly 60% in 2024 (Thünen Institute, unpublished data).

Evaluation of the current regulation with regards to the protection of weak salmon stocks

So far, no information was available on the post-release survival rates of Atlantic salmon caught in trolling fisheries in the Baltic Sea—or in marine environments in general—nor on the potential sub-lethal effects (e.g., behavioral impacts) of catch-and-release (Muoneke & Childress, 1994; Bartholomew & Bohnsack, 2005; Hühn & Arlinghaus, 2011). As a result, the absence of reliable data made it impossible to accurately assess post-release mortality, which prevented precise calculation of fishing mortality from the Baltic salmon trolling fishery. For ICES stock assessment purposes, a post-release mortality rate of 25% for salmon in Baltic Sea trolling fisheries is currently assumed (ICES, 2025b). To investigate the post-release survival rates of Baltic salmon in the trolling fishery, tagging experiments were conducted in Sweden (SLU) and Germany (Thünen) in 2023 and 2024 (ICES, 2025b). “Pop-up satellite archival tags” (PSATs) were used to record swimming behavior and survival of recreational caught salmon for up to 45 days after release. A total of 44 salmon were tagged and released under realistic fishing conditions, with most fish caught in April and May 2023 and 2024 during recreational trolling in ICES SD 24 and 25. Data were obtained from 41 tags.

Preliminary results indicate that 4 out of 29 tagged fish died within ten days after being caught and released, corresponding to a post-release mortality rate of 13.8% (95% confidence interval: 0.0–28.8%; ICES, 2025b). Unexpected depth profiles were recorded for the remaining 12 salmon. Ongoing analyses aim to determine whether these fish survived. However, there is evidence that most of these 12 fish survived for at least 24 hours after release, suggesting low short-term post-release mortality (ICES, 2025b). Several studies on other fish species, as well as data from this study, show that the majority of post-release mortality in recreational fisheries occurs within 24 hours (Muoneke & Childress, 1994; Weltersbach & Strehlow, 2013; Gale et al., 2014; Lewin et al., 2018). This implies that the actual post-release mortality may be lower than 13.8%, but this requires further analyses. Anecdotal information also indicates low and short-term sub-lethal effects on the tagged fish after catch-and-release. For example, one tagged salmon was recaptured by trolling in the same sea area nine days after tagging, suggesting normal feeding behavior. Another fish was recorded by a fish counter in the River Byskeälven (Sweden) and later recaptured by an angler in the river, indicating successful spawning migration (ICES, 2025b).

In summary, the post-release mortality rate of 25% currently used in the stock assessment is likely significantly overestimated. The vast majority of wild salmon released by trolling anglers survive, demonstrating that the existing regulation effectively supports the objective of protecting weak wild salmon populations. Furthermore, post-release survival rates could likely be further increased through guidelines on best practices for catch-and-release in salmon trolling fisheries. A method has already been successfully tested in which wild salmon are quickly and gently unhooked in the water alongside the boat using a special hook-releasing device.

In 2024, the Thünen Institute, together with the Natural Resources Institute Finland (LUKE), started a population genetic study of salmon caught in the German recreational trolling fishery (ICES, 2025b). So far, samples from 39 salmon caught in the Rügen area (SD 24) have been analyzed using Single Nucleotide Polymorphism (SNP) analysis (see ICES (2025b) for methodological details). The results show that all sampled salmon originated from Swedish or Finnish rivers: 33% from AU 1, 26% from AU 2, 5% from AU 3, and 3% from AU 4 (see Fig. 1). The remaining 33% were hatchery-reared fish from Sweden and Finland. No salmon from AU 5 were detected in the catches. Although the sample size is still relatively small, it can be concluded that the likelihood of catching a wild salmon from the weak AU 5 populations in the German

trolling fishery is low. This study will continue and be expanded to determine whether, and to what extent, wild salmon from the weak AU 5 populations are caught in the German trolling fishery.

Assessment of the Commission's proposal by the Thünen Institute

The proposal to completely close the recreational salmon fishery in ICES SD22–29S is a drastic measure that would have significant social and economic consequences. It would lead to the complete collapse of the already heavily affected salmon trolling fishery in Germany, as well as in other Baltic Sea coastal states. The current regulation has already resulted in a reduction of salmon landings by more than 85% in Germany and 77% across the entire Baltic Sea, thereby significantly reducing fishing mortality from recreational trolling.

Considering the various ICES model scenarios (ICES, 2025b,c), it becomes clear that, with the same total allowable catch (e.g., Scenario 7: TAC = 40,000 salmon, without trolling south of the Åland Sea, and Scenario 12: TAC = 40,000 salmon, with trolling south of the Åland Sea), the projected number of spawners in the total stock is actually slightly higher in the scenario with trolling (Scenario 12: 132,880 spawners) than in the scenario without trolling (Scenario 7: 127,230 spawners), because in the scenario without trolling more older fish are caught shortly before spawning. The scenario recommended by ICES, based on the MSY approach (133,620 spawners; TAC = 30,000 salmon; without trolling south of the Åland Sea), is very similar to the scenario with recreational trolling. This suggests that the impact of the trolling fishery in the southern Baltic Sea on the overall number of spawners is very limited.

Preliminary results from the tagging study also demonstrate a very high post-release survival rate (>86%) in this fishery. In our view, this supports the effectiveness of the current bag limit of one adipose fin-clipped salmon per angler and day and represents a reasonable compromise between protecting the weak wild salmon populations in AU 5 and maintaining the trolling fishery as an important economic factor for structurally weak regions.

Furthermore, it remains unclear to what extent salmon from the weak AU 5 stocks are currently being caught in the mixed fishery of the southern Baltic Sea through trolling. Our initial genetic studies have found no evidence of wild salmon from AU 5 in the German catches in the southern Baltic Sea so far.

In light of this information, we believe that maintaining the current regulation for 2026 ('rollover') represents the most balanced approach, safeguarding both marine recreational salmon fishing opportunities and the protection of weak wild salmon stocks in the Baltic Sea.

Should you have any further questions, please do not hesitate to contact us.

Best regards



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Additional data from Poland

Table 1. Cod fishing in 2024

L.p	Year	Country	Species	Zone name	Final Quota 2024 (t)	Total catches 2024 (t)
1	2024	Poland	COD	3BC+24	45,170	10,576
2	2024	Poland	COD	3DX32.	176,330	89,630