#### Fishing capacity of the Finnish fleet in 2020

#### Foreword

This report uses data from 2020 and 2021 to assess the annual capacity of the national fleet and fleet segments, identify any possible structural overcapacity in the fleet and determine the fleet's long-term profitability. The report has been drawn up in accordance with Commission Guidelines COM(2014) 545, 2.9.2014.

# 1. The Finnish fishing fleet and fisheries

Table 1.1 shows the development of the fishing fleet from its establishment on 1 January 1995 to 31 December 2020. Finland's fishing capacity has decreased for all size indicators of the fleet: number of vessels (units) -23.4%, tonnage (GT) -36.4% and propulsion power (kW) -25.5%.

Since 1 January 2014, the size of the Finnish fleet has also decreased for all indicators as follows: number of vessels (units) -2.1%, tonnage (GT) -5.2% and propulsion power (kW) -3.0%. The size of the Finnish fleet (Table 1.2) is well below the maximum capacity laid down in Article 22(7) of the basic Regulation ((EC) No 1380/2013) (Annex II).

Status as at 1 January 1995 - initial level		
GT kW No		
24 618.13 224 875.54 4 107		
Status as at 1 January 1997	Change compared to previous status	
GT kW No	GT kW No	
23 502.18 190 161.32 3 573	-1 115.95 -4.5%, -6 381.12 -2.8%, -86 -	
	2.1%	
Status as at 1 January 2003	Change compared to previous status	Change compared to initial level
GT kW No	GT kW No	GT kW No
19 861.84 190 161.32 3 573	-3 640.34 -15.5%, -28 333.10 -13.0%, -	-4 756.29 -19.3%, -34 714.22 -15.4%, -
	448 -11.1%	534 -13.0%
Status as at 31 December 2013	Change compared to previous status	Change compared to initial level
GT kW No	GT kW No	GT kW No
16 523.65 172 611.33 3 211	-3 640.34 -15.5%, -28 333.10 -13.0%, -	-8 094.48 -32.9%, -52 264.00 -23.2%, -
	362 -11.1%	896 -21.8%
Status as at 31 December 2020	Change compared to previous status	Change compared to initial level
GT kW No	GT kW No	GT kW No
15 665.27 167 485.45 3 145	-858 38 -5.2%, -5 126.09 -3.0%, -66 -	-8 952.86 -36.4%, -57 390.09 -25.5%, -
	2.1%	962 -23.4%

Table 1.1. Development of the Finnish fishing fleet since EU accession, period from 1 January 1995 to 31 December 2020 (as calculated in accordance with the most recent national and EU fishing register status reports on 23 April 2021).

Under Article 22(7) (Annex II) of Regulation (EU) No 1380/2013, Finland's fishing capacity ceiling may not exceed 18 066 GT and 181 717 kW after 1 January 2014. These are imputed ceilings that take into account the supported decommissioning of fishing vessels. The capacity of Finland's fleet remained well below this ceiling between 1 January 2014 and 31/12/2020.

Art. 22	Status as at 31	Difference from the fishing capacity ceiling
Reg.(EU) 1380/2013	December 2020	

<mark>Total</mark>	GT	kW	GT	kW	GT	%	kW	%
	18 066	181 717	15 751	169 292	-2 315	-13%	-12 425	-7%

Table 1.2 Fishing capacity of the Finnish fishing fleet on 31 December 2020 compared to the ceiling defined in Regulation (EU) 1380/2013 (as calculated in accordance with the most recent national and EU fishing register status reports on 23 April 2021).

According to the most recent report, the Finnish fishing fleet on 31 December 2020 was -2 401 GT (-13%) and -14 232 (-8%) less than the ceiling on fishing capacity permitted under the Regulation.

Table 1.3 below summarises the development since 1 January 2003 in both categories.

A new fleet management system was introduced in Finland in 2011 under the Act on the registration of sea-going vessels engaged in fishing and aquaculture (690/2010). The fleet is divided into offshore vessels and coastal vessels. The aim is also to ease ship registration processes. The Act entered into force on 1 January 2011.

During 2020 the overall capacity of the fleet increased in terms of tonnage (42 GT; 0.3%), propulsion power (-2 899 kW; -1.7%) and figures (-65 vessels; -2.0%).

The decrease in capacity was significant compared to the corrected initial level of 1 January 2003: 21% (GT) and 12% (kW) for the whole fleet. The reduction was starkest in the coastal vessels category, where the number of vessels fell by 64%, tonnage by 11% and propulsion power by 36%. The main cause for this was the drift net fishing ban that came into force on 1 January 2008. In numerical and percentage terms, the main decrease in vessel tonnage has been in coastal vessels.

	Status as	at 1 January	<mark>2003</mark>	Status a	Change compared to initial level							
	<mark>GT</mark>	kW	<mark>No</mark>	GT GT	<mark>kW</mark>	<mark>No</mark>	GT	<mark>%</mark>	kW	<mark>%</mark>	No	<mark>%</mark>
<ol> <li>Offshore vessels</li> </ol>	9 429	41 486	119	8 369	26 656	43	-1 060	-	-14	-	-76	-64%
								1	830	3		
								1		6		
								%		%		
2. Coastal vessels	10 433	148 675	3 454	7 296	140 829	3 102	-3 137	-	-7	-	-	-10%
								3	846	5	35	
								0		%	2	
								%				
<mark>Total</mark>	19 862	190 161	3 573	15 665	167 485	3 145	-4 197	-	-22	-	-	-12%
								2	676	1	42	
								1		2	8	
								%		%		

Table 1.3. Development of the Finnish fishing fleet in the period from 1 January 2003 to 31 December 2020 (as calculated in accordance with the most recent national and EU fishing register status reports on 23 April 2021), broken down by type of vessel.

A significant number of coastal vessels are used to fish mainly non-quota species: coastal fish stocks, such as whitefish (*Coregonus lavaretus*), pike-perch (*Stizostedion lucioperca*), pike (*Esox lucius*) and perch (*Perca fluviatilis*). Coastal fishing of quota species targets herring (*Clupea harengus membras*) and

salmon (Salmo salar). Some coastal vessels also fish cod (Gadus morhua). Offshore vessels are principally used to fish herring and sprat (Sprattus sprattus).

# 2. Fishing capacity

Table 2.1 presents the quota percentage take-ups for 2020. The rate was the highest in sprat fishing (SPR 3BCD-C), where 96.89% of the quota was utilised. The take-up percentage of herring quotas (HER 30/31 and 3D-R30) and salmon quotas (SAL 3BCD-F and 3D32) was also good.

Since 2017, Finland has applied a system of transferable fishing concessions (TFC) and operator-specific fishing quotas for herring, sprat and salmon. The fishing quota system allows fishing undertakings, as the holders of the quotas, to decide when and in which areas they will fish their own quotas. This gives them plenty of scope to plan fishing better. In 2020 catches were significantly more evenly spread across the timeframe.

The fishing quota system meant it was not necessary to restrict the utilisation of herring and sprat quotas in 2020.

<b>Nationality</b>	<mark>Species</mark>	Total quota	Landed in	<b>Landed</b>	Catch/quota	
	<mark>Area</mark>		<mark>Finland</mark>	<mark>elsewhere</mark>	<mark>Total</mark>	<mark>(%)</mark>
FIN	HER 3BC+24	0.112	0.000	0.000	0.000	0.00%
FIN	HER 30/31	62 489.137	49 635.819	10 882.675	60 518.494	96.85%
FIN	HER 3D-R30	34 415.928	24 671.726	7 214.530	31 886.256	92.65%
FIN	COD 3DX32	63.000	24.471	0.0000	24.471	38.84%
FIN	SAL 3BCD-F	24 172	20 589	0	20.589	85.18%
FIN	SAL 3D32	9,379	8.017	0	8.017	85.48%
FIN	SPR 3BCD-C	12 898.607	5 276.180	7 221.872	12 498.052	96.89%

Table 2.1. Quotas, catches and landings in Finland (tonnes, individual salmon) in 2020

The take-up percentages for herring and sprat reflect the prevalence of these species in Finnish waters.

As regards salmon fishing, in 1996 Finland introduced a decree that restricts fishing in order to protect wild salmon stocks from overfishing. Fishing is regulated in Finland's territorial waters and exclusive economic zone in the Gulf of Bothnia.

The small take-up percentage of the cod quota can be attributed mainly to the small fleet, weakened stocks and the related fishing bans.

Under Council Regulation (EC) No 2371/2002 on the Common Fisheries Policy, which was still in force in 2013, the first capacity reduction of the fishing fleet was in 2004. This reduction was to remove the excess capacity identified in the pelagic fleet and the driftnetter category.

Another capacity reduction took place in the fishing fleet in 2009. The decision was made to remove excess capacity that had accumulated in the driftnetter category as a result of the ban on drift netting.

From 2004 to 2009 public support was used to permanently remove a total of 1 675 GT and 7 815 kW of fleet capacity from the Finnish fishing fleet. Table 2.2 shows the number of vessels removed as well as the dates.

Removing fishing capacity using public aid (GT/kW)

Code	<mark>Vessel</mark>	<mark>2004</mark>	<mark>2005</mark>	<mark>2006</mark>	<mark>2009</mark>	<mark>Total</mark>
	<mark>category</mark>					
<mark>4L2</mark>	Pelagic Pelagic	83 GT /	974 GT / 4	247 GT /	-	1 304 GT / 5
	trawlers	279 kW	451 kW	699 kW		429 kW
<mark>4L4</mark>	<mark>Vessels</mark>	60 GT /	49 GT /	17 GT /	245 GT / 1	371 GT / 2
	using	294 kW	304 kW	90 kW	698 kW	386 kW
	passive gear					
<mark>Total</mark>		143 GT /	1 023 GT / 4	264 GT /	245 GT / 1	1 675 GT / 7
		573 kW	755 kW	789 kW	698 kW	815 kW

Table 2.2 Permanent reduction of the capacity of the Finnish fishing fleet in 2003-2020 using public support

Table 2.3 presents the number of active offshore vessels at least 12 metres long in three vessel categories in 2003-2010 and in one vessel category in 2011-2020. The trend in the pelagic vessels category has been towards fewer but larger vessels. The number of vessels was halved during the period under review. The decrease in the number of vessels using passive gear results from the ban on drift netting. Since 2011, all vessels at least 12 metres long have been grouped into one vessel category (offshore vessels).

	Year																	
No of active vessel	200 3	<mark>200</mark> 4	<mark>200</mark> 5	<mark>200</mark> 6	<mark>200</mark> 7	<mark>200</mark> 8	<mark>200</mark> 9	<mark>201</mark> 0	201 1	<mark>201</mark> 2	201 3	<mark>201</mark> 4	<mark>201</mark> 5	<mark>201</mark> 6	<mark>201</mark> 7	<mark>201</mark> 8	<mark>201</mark> 9	<mark>202</mark> 0
4L2, pelagi c trawle rs	107	95	80	58	55	51	53	52										
4L3, botto m trawle rs	2	2	1	1	1	1	1	1										
4L4, vessel s using passiv e gear	23	22	20	16	18	14	9	7										
Total (offsh ore vessel s as from 1 Januar y 2011)	132	119	101	75	74	66	63	60	54	53	57	59	58	55	49	44	43	43

Table 2.3 Number of active vessels in 2003-2020 in the Finnish fishing fleet, vessel categories 4L2-4L4 and offshore vessels as from 1 January 2011.

# 3. Entry/exit scheme and fishing capacity ceilings

# 3.1. Entry/exit scheme

Regulation (EC) No 2371/2002, later replaced by Regulation (EC) No 865/2007, was in force in 2013. This Regulation requires Member States to manage entries into and exits from the fleet in such a way that the entry of new capacity into the fleet without public aid is compensated by the previous withdrawal without public aid of at least the same amount of capacity.

Notwithstanding the above, the safety tonnage of fishing vessels may be increased under Article 11(5) of Regulation (EC) No 865/2017.

In 2009 the Finnish authorities allowed the tonnage of two (2) vessels of the fishing fleet to be increased by a total of 35 GT under the above-mentioned scheme. In 2011 the other vessel was removed from the register, thereby reducing the increase in tonnage to 23 GTs.

# 3.2. Fishing capacity ceilings

The following reference levels for the Finnish fishing fleet as from 1 January 2003 have been ratified in Annex 1 to Commission Regulation (EC) No 1013/2010. That text was still in force in 2013.  $R(GT)_{03} = 23203 GT$ 

 $R(kW)_{03} = 216 \ 195 \ kW$ 

Finland had met all the requirements of the fourth Multiannual Guidance Programme IV (MAGP IV) by 31 December 2013.

As a result of the entry/exit scheme provided for in Article 13 of Council Regulation (EC) No 865/2007, the actual maximum authorised target levels of the fleet were smaller. New target levels for 2013 were calculated on the basis of the Regulation. The new fishing capacity ceilings for Finland are set out in Article 22(7) of and Annex II to Regulation (EC) No 1380/2013. As from 1 January 2014, they are:

 $R(GT)_{14} = 18066 GT$ 

 $R(kW)_{14} = 181717 kW$ 

In 2020 no events were recorded in the fishing vessel register that would have affected these ceilings. The re-measuring of certain vessels of the fleet and the corrections made to some of the registered data have also affected the actual target levels (capacity ceiling).

According to the most recent report, the Finnish fishing fleet on 31 December 2020 was -2,401 GT (-13%) and -14,232 (-8%) less than the ceiling on fishing capacity permitted under the Regulation.

Tables 1.1, 1.2 and 1.3 show that Finland complied with all the target levels set and the rules of the entry/exit scheme in 2020 as well as in the previous years of the 2003-2019 monitoring period.

# 4. Observations on the fishing fleet

The development of the fishing fleet and its impact on fishing opportunities have been analysed above. This paragraph contains more details as well as background information.

The fleet is divided into two operational units (vessel categories). This division came into force on 1 January 2011. Vessel category 1 includes offshore vessels: pelagic trawlers, bottom trawlers and vessels using passive gear. Vessel category 2 includes coastal vessels. The predecessors of these vessel categories were determined in the fourth Multiannual Guidance Programme (MAGP IV). The vessel category rules and restrictions were mandatory until 31 December 2012. However, at the time vessels were not able to adapt flexibly to new market conditions and quota quantities that fluctuated yearly. Those restrictive provisions ceased to apply as of 1 January 2013, after which the management of fleet segments became the Member States' duty.

The new vessel categories established at national level do not restrict either the right to use certain types of fishing gear or target species. This means that if the vessel owner so wishes, he may change the type of fishing engaged in. The vessel owner only needs to inform the authorities of changes to the registered data. This makes it possible for the authorities to regularly supervise and manage the situation.

At the end of 2020, there were 43 vessels in the offshore vessels category. As stated in the definition, all the vessels in this category are at least 12 metres long in total; the overall length of the largest vessel is 51.44 metres. The overall capacity of the vessel category accounted for 53.4% (GT) and 15.9% (kW) of the entire fleet.

In accordance with the definition, the vessels in the coastal vessels category have an overall length of less than 12 metres. Most of Finland's fishing vessels (3,102 vessels) belong to this category. The overall capacity of the vessels is 46.6% (GT) and 84.1% (kW) of the entire fleet.

The registered capacity ceiling of both vessel categories has been limited separately by a decision of the Finnish Government.

Generally speaking, the capacity and fishing effort of the Finnish fishing fleet can be considered acceptable in relation to the available fishing opportunities.

For the Finnish fleet, the most significant quotas fished in terms of fishing effort were herring in 30/31 (96.85%) and 3D-R30 (92.65%) and sprat in 3BCD-C (96.89%). The operator-specific quota system meant both the herring and sprat quotas could be used optimally.

Finland's cod fleet is rather small, so annual fluctuations in fishing effort and catches can be expected. In 2020, cod was fished only to a limited extent for research purposes, as cod fishing is banned under Council Regulation (EU) 2019/1838. Most of the trawler vessels that had previously caught cod have switched to exploiting fishing opportunities for herring and sprat. Only a few coastal vessels fished for cod in a small-scale manner, for cod to be used in research projects.

At the beginning of 2017, Finland introduced a system of transferable fishing concessions (TFC) and operator-specific fishing quotas for herring, sprat and salmon. This has made it easier to manage the quotas since 2017, because, for example, it is no longer necessary to regulate herring and sprat fishing. Fishing undertakings decide themselves when and in which area they fish under their quota. This new quota system will likely reduce fishing capacity in Finland, as has happened in other countries after the

introduction of a similar system. The number of offshore vessels in Finland actually decreased, from 55 vessels active in 2016 to 43 registered active vessels in 2020.

In point 5 below, we examine the balance between the fleet and resources using indicators set out in the Commission's guidelines.

# 5. Analysis of the balance between the fishing fleet and the fishery resources it exploits, using biological, financial and technical parameters

## 5.1. Biological indicators

Biological indicators are used to assess whether the fleet's operations are based on over-exploited stocks or whether they may pose a serious biological risk to endangered fish stocks.

The Finnish fishing fleet uses the following fishing quotas in the Baltic Sea:

- Bothnian Bay herring (subdivisions 30-31)
- Herring in the main basin of the Baltic Sea and in the Gulf of Finland (subdivisions 25–27, 28.2, 29 and 32)
- Sprat (subdivisions 22-32)
- Eastern cod (subdivisions 25-32)
- Salmon in the main basin of the Baltic Sea and in the Gulf of Bothnia (subdivisions 22-31)
- Gulf of Finland salmon (subdivision 32)

These quotas have been ratified by the European Council, on the basis, among others, of the scientific advice given by ICES and STECF.

In accordance with the scientific recommendations issued by ICES on 28 May 2021, the status of these fish stocks is as follows:

#### Pelagic stocks

The status of herring stocks in the Bothnian Bay (ICES subdivisions 30-31) has been evaluated by analysis. The spawning-stock biomass (SSB) of the herring stock in the Bothnian Bay is above the target level (SSB 2020 greater than MSY Btrigger), while fishing mortality is below the target level (Fmsy 0.206-0.272, point value 0.271, in 2020

F was 0.16). According to the latest scientific advice figures, this has been the status quo in recent years.

ICES therefore recommends that the TAC for herring in the Bothnian Bay is significantly increased for both the current year, 2021,

and for 2022. The Gulf of Bothnia herring quota (ICES subdivisions 30-31) is economically the most important quota for the Finnish fleet. The increase in this quota, which has been almost fully exploited in recent years, will therefore improve the financial situation of fishing enterprises.

The spawning-stock biomass (SSB) of the herring stock in the main basin of the Baltic Sea and the Gulf of Finland (ICES subdivisions 25-27, 28.2, 29 and 32) has decreased to below target level (SSB 2020 is between Btrigger and Blim levels), while the fishing mortality is significantly higher than the target level (FMSY 0.15-0.26, point value 0.21, while in 2020 F was 0.46). According to the latest scientific advice figures, this has been the status quo in recent years. The new scientific advice has led to a reduction of the TAC, which will worsen the economic situation of fishing undertakings.

The spawning-stock biomass (subdivisions 22-32) of the herring stock is at target level (SSB 2020 is significantly above the MSY Btrigger), while the fishing mortality is in the Fmsy range (Fmsy 0.22-0.41, point value 0.31, in 2020 F was 0.37). Based on the latest scientific advice figures, this has been the status quo for fishing mortality in recent years, for the spawning stock only since 2020. The new scientific advice led, on the basis of the value of Fmsy, to an increase in the TAC in question, which will improve the economic situation of fishing enterprises and offset the reduction in the TAC for herring in the Baltic Sea basin and in the Gulf of Finland.

The above-mentioned pelagic stocks constitute a fairly important resource for the Finnish fishing fleet, in particular for trawlers. According to the Commission's guidelines, two out of three fish stocks are exploited within the range of Fmsy, only herring stocks in the main basin of the Baltic Sea and in the Gulf of Finland are overfished (exceeding the upper value of Fmsy as defined in the Guidelines). According to the STECF 20-11 report, Finnish pelagic trawlers in sizes 12-18, 18-24 and 24-40 receive a SHI indicator value above 1 (F/Fmsy > 1) on the basis of 2018 data, which, according to STECF, could create an imbalance with their fishing opportunities. The Ministry of Agriculture and Forestry considers that, in view of the above, this indicator value for 2018 was not sufficiently accurate to reflect the situation or current status of the fleet segments concerned.

STECF also notes that the situation can be assessed differently, given that the financial indicators CR/BER, ROI and RoFTA all show that the segments are in balance, with the exception of the ten vessels in the size range 18 to 24 metres.

# Cod stocks

ICES has stated that fishing of the eastern cod stocks (subdivisions 24-32) must stop, based on the cautionary principle. According to ICES advice in 2020, the western cod stock (subdivisions 22-24) is weaker than the target level for both fishing mortality and SSB (Fmsy exceeded and Btrigger too low). Finland's shares of the cod quotas are small, and cod quotas do not form a significant part of the Finnish fishing fleet's fishing opportunities In 2020, Finland's cod quotas were taken up by Finnish fishing vessels only in the east, not in the west. Cod is found mainly in the southern Baltic Sea, so only marginal amounts of cod are caught in Finnish territorial waters and within Finland's exclusive economic zone. Cod was fished in a few coastal areas and only in small quantities using passive gear and as part of research fishing. In accordance with the guidelines, the fishery for the cod stock at biological risk (SAR indicator) is therefore only a scientific fishery with a small amount of catches by the Finnish fishing fleet.

# Salmon stocks

There are numerous salmon stocks in the Baltic Sea. In 2020, ICES analysed the status of 29 wild salmon stocks on the basis of their parr production capacity (MSY = 75% of the capacity). There are two wild salmon stocks in Finland, the Simojoki and the Tornionjoki stocks. The Tornionjoki salmon stock is the

biggest salmon stock in the Baltic Sea, and it has developed well. On the basis of its model, ICES estimated in 2020 that Tornionjoki salmon reached, with more than 90% probability, 75% of their parr production capacity in 2018. The probability for Finland's other wild salmon stock, the Simojoki stock, was 30-70%. Both wild salmon stocks have developed positively since 2000.

In the Gulf of Bothnia and the Archipelago Sea, salmon fishing targets the strong salmon stocks of the Bothnian Bay and stocked salmon intended for fishing. Coastal fishing in the Gulf of Finland mainly targets stocked salmon. Salmon caught in Finland's coastal areas also included small quantities of individual fish from weak salmon stocks in the Bothnian Bay. Salmon fishing in Finland is carried out as coastal fishing, where the fishing capacity is based on the gear used, not on the tonnage or propulsion power of the fishing vessels. Salmon fishing in the Gulf of Bothnia is restricted to certain periods and catch amounts are limited. The locations of the fishing nets used to catch salmon are managed partly by the fishing authorities, which also limits the fishing effort. In addition, private fishing rights in coastal waters limit commercial salmon fishing.

#### Non-quota stocks

Important non-quota fish stocks exploited by the Finnish fishing fleet include perch, pike-perch, whitefish and pike. ICES has not analysed data for these fish stocks. However, the Natural Resources Institute's research report on the status of fish stocks in 2019 and its forecasts for 2019 and 2020 contains information on the status of those fish stocks. The need for data on these fish stocks has been identified, and measures are being taken to provide more data and comply with the Marine Strategy Framework Directive.

Finland's whitefish stocks are mostly based on stocking, and natural reproduction occurs both at sea and in numerous rivers. Research results show that it is necessary to regulate net fishing in order to reduce the fishing pressure on migratory whitefish feeding in the waters. Consequently a decree has been issued limiting the smaller mesh sizes of nets used to catch whitefish. Whitefish fishing is also coastal fishing, where the fishing capacity is based on the gear used, not on the tonnage or propulsion power of the fishing vessels.

Finnish coastal waters are home to numerous local perch, pike-perch and pike stocks. Commercial fishing plays a greater role than recreational fishing in exploiting perch and pike stocks. The pike-perch catch is bigger in commercial than in recreational fishing. These species are targeted by coastal fishing, where the fishing capacity is based on the gear used, not on the tonnage or propulsion power of the fishing vessels.

When quotas are exceeded, this usually indicates overcapacity of a fleet segment. The Finnish fishing fleet's catch of fish species subject to a quota is based on quotas set by the Council of the European Union. Finland has not exceeded any of the quotas set for it by the EU since 1996. This has been ensured by regulating fishing and allocating resources to the supervision of fishing.

#### 5.2. Financial indicators

According to the STECF 20-11 report, the 2014 criteria (2014 balance indicator guidelines), the financial indicator values would suggest that the Finnish fleet in 2018 was essentially in balance with the fishing opportunities. Based on the indicators, only vessels of less than 10 metres in length were not in balance.

The Ministry of Agriculture and Forestry notes that in practice, profitability depends on the market prices of herring and sprat. The Russian-imposed ban on fish imports also affects profitability. Then again, the fishmeal factory that began operating in Finland in 2016 has improved the market situation. The profitability of coastal fishing is shrinking as a result of damage to catches and gear caused by seals and cormorants.

Moreover, any financial review of the Finnish fishing fleet should take into account the special characteristics of coastal fishing in Finland. In most of this fleet segment, fishing accounts for only part of the total income and is a source of secondary income. The formation of ice in the winter in Finland means that it is not possible for fishing vessels to operate year round. Fishing in the winter can be carried out only with large trawlers, and even that is not possible in certain periods and areas. In this light, the profitability of coastal vessels, too, can be considered acceptable. It should be kept in mind, in particular, that the main catch of this fleet segment comes from non-quota fish stocks whose biological status is sustainable.

In the view of the Ministry of Agriculture and Forestry, the STECF indicators poorly describe the financial situation of vessels in the Finnish fishing fleet, in particular those with a length of less than 12 metres and its relation to fishing opportunities. In our estimation, operations are mostly profitable, and the factors described above do not justify the conclusion that the fleet is out of balance with fishing opportunities. For economic indicators, the net result in coastal fisheries is affected by the use by STECF of imputed depreciation (capital accumulation method) rather than depreciation in the financial statements. There is a big difference between the write-off and the imputed depreciation of annual accounts, in particular where ships are old and used only occasionally.

#### 5.3. Technical indicators

According to 2019 data, the annual activity of the coastal vessels (below 12 metres) in the Finnish fishing fleet, measured as vessel utilisation, was rather low in the period under review. This can be explained by Finland's special circumstances. The icy winter conditions in Finland do not allow year-round fishing, and therefore it is not possible to be at sea more than 180 days a year. As mentioned above, this form of fishing is not usually the principal economic activity of owners of coastal vessels, but rather a source of secondary income.

The report shows that in the Finnish fishing fleet, the inactivity rate is rather high, especially in the fleet segment of small coastal vessels. This is partly due to statistical bias. In coastal fishing (vessels less than 10 metres), commercial fishermen usually own a number of vessels, not all of which are in active use. One of the distinctive features of Finnish coastal vessels is that coastal fisherman use different fishing methods, requiring different vessels. For example, trap fishing must include large-loaded vessels carrying traps, pound nets and anchors and sometimes fish, while net vessels are fast and small, and larger vessels are required on the high seas. This means there is a variety of vessels, intended for different seasons and specific work phases. Hence they are also used only when needed, usually for a very short time during the whole period.

In contrast, there are but few if any inactive vessels in the fleet segment consisting of large (trawlers 24-40 metre) vessels. The minor periods of inactivity of certain vessels can be explained by several factors: change of generation, occupational choices, illness, etc. On the other hand, it should be kept in mind

that when the commercial profitability of certain units falls, the vessels are left unused while waiting for better times. In that case, other sources of livelihood are naturally used.

The STECF 19-13 report states that technical indicators should be interpreted with caution, and that local expert knowledge is generally required to accurately interpret indicator data. This applies specifically to small-scale fleet segments. We would agree with this point and refer to our assessment above.

#### 6. Information on the management of the fishing fleet register

Finland's central fisheries register (KAKE) was established in 2003 and brought into administrative use at the beginning of 2004. Since then, the supervisory authorities have had a reliable way of managing a variety of fisheries registers, including the fishing fleet register.

The fleet register system was overhauled in 2004. Since then, the authorities have been able to take screenshots of the register and send them to the Commission in accordance with Regulation (EC) No 26/2004. The content of the fleet register was inspected in the first screenshot (1 September 2004). Subsequent screenshots have passed the inspections with hardly any errors. The errors found have been corrected, and some of them have been discussed with Commission officials.

At present, the fleet register is being properly maintained and functions adequately. Register data are pertinent and accurate. The authorities have developed a national programme to verify the accuracy of register data. This will ensure even better data quality. The programme includes a confirmation function, which also facilitates management of the fleet.

#### 7. Conclusions

The capacity of the Finnish fishing fleet has decreased continuously since Finland joined the European Union, also after the new base level was set on 1 January 2014. The number of pelagic trawlers, in particular, has been reduced in Finland. This has been done to lessen the herring fishing effort. Similarly, the fleet using passive gear has been reduced following the driftnet ban. Finland has complied well with the fishing fleet provisions.

The present report has shown the following:

- The overall capacity of the Finnish fishing fleet has decreased continuously since Finland joined the European Union and has remained below the permitted limits;
- The low activity of the coastal vessels in Finland's fishing fleet can be explained by the icy conditions, the nature of coastal fishing and the secondary nature of fishing activities; the inactivity is also related to the fact that commercial fishing operators often own several coastal vessels, used for various purposes and some only for a short period of the year;
- The profitability of the Finnish fishing fleet is reasonable, considering the special characteristics of Finnish fisheries;
- Finland has not exceeded the quotas set for it since 1996. Since 2017, Finland has applied transferrable fishing concessions (TFC) and operator-specific fishing quotas for herring, sprat and salmon, which in turn reduces fishing capacity:

- The herring stocks exploited by the Finnish fishing fleet are at the target level (MSY Btrigger) in accordance with Regulation (EU) No 1380/2013; Sprat stocks are also at target level. The herring stocks in the main basin of the Gulf of Finland and the Baltic Sea are below the target level and exploited at a fishing mortality rate higher than the target level.
- The eastern cod stocks are weak, but their importance to the Finnish fishing fleet is marginal;
- All of the salmon stocks exploited by the Finnish fishing fleet are not at or near target level; their fishing is being regulated through technical regulations, because the fishing pressure is based on the use of gear and the fleet capacity does not have much effect on the fishing pressure; and
- the non-quota stocks exploited by the Finnish fishing fleet are principally local stocks and there is no precise scientific assessment of their status; their fishing is being regulated through technical regulations, because the fishing pressure is based on the use of gear and the fleet capacity does not have much effect on the fishing pressure.

The Ministry of Agriculture and Forestry considers that the information provided in this report shows that the fishing capacity of the Finnish fishing fleet and the fishing opportunities are in balance as provided for in Article 22 of Regulation (EU) No 1380/2013 and that there is no overcapacity in the fleet.