

Stockholm & Brussels, 16 September, 2014

To: The Fisheries Ministers of the EU Member States

Re: Input to the EU Fisheries Council meeting, 13–14 October 2014

Dear Minister ,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations on the European Commission's proposal on fishing opportunities in the Baltic for 2015 (COM(2014)552). We ask you to endorse them in your deliberations at the upcoming Fisheries Council meeting in order to ensure more sustainable utilisation of our common marine resources.

We welcome the Commission's proposal, which is largely in line with the objectives of the reformed Common Fisheries Policy (CFP), the principles set out for the fixing of fishing opportunities in the earlier Commission Communication (COM(2014)388), as well as scientific advice. This decision on the Baltic Sea TACs will be the first test of the new management objectives and your willingness as Minister to firmly support the agreement. In addition, most Baltic stocks – cod, herring, sprat and salmon – will be covered by the EU landing obligation from 1 January 2015, and therefore the fishing opportunities proposed now are total catches, including former discards.

In short, this is our recommendations:

- For the **western Baltic cod** stock we call on you to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.
- The Commission has not proposed a TAC for the **eastern Baltic cod stock**, but due to the exceptional circumstances – it is now classified as data-limited – we call on you to support the ICES advice to apply an “uncertainty cap” resulting in a total catch of 29 085 tonnes. However, a prompt implementation of the landing obligation is of great importance, as it will provide better data on the total catches and could contribute to a faster stock recovery. Therefore, a roll-over of the total catches in 2013 – including estimated discards – of 36 356 tonnes could be considered.
- For **western Baltic herring, central Baltic herring** and **Gulf of Riga herring** we call on you to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.
- For **herring in the Bothnian Sea and Bay** we suggest a more modest increase in the TAC of 15 per cent, resulting in 158 700 tonnes – considering the large uncertainties in the scientific data underpinning the assessment, and the continuous overestimations of the productivity of these stocks.
- For **Baltic sprat**, we call on you to support the Commission proposal, which is in line with scientific advice and the F_{MSY} target for 2015.
- For **salmon in the Main Basin and the Gulf of Bothnia**, we call on you to recommend a total commercial catch at sea for 2015 of no more than 82 000 individuals (based on the reported catch for 2013 + an estimated discard of 3 000 undersized individuals). The

ICES advice for this area includes estimated discards of seal-damaged fish, as well as unreported and misreported catches – none of which will be addressed by the landing obligation if the BALTFISH recommendation to exclude seal-damaged fish in the discard ban plan prevails.

- For **salmon in the Gulf of Finland**, we call on you to recommend a total commercial sea catch of less than 9 864 individuals for 2015, including the 81 per cent reported wanted catch and the estimated 2,6 per cent discard of undersized fish (“unwanted catch”). There should be no commercial fisheries on wild salmon in this area, and subsequently all salmon caught in the Gulf of Finland that retains its adipose fin should be released. This should be possible even with the discard ban because of the proposed exemption for trap-nets.
- We also urge you to support the Commission proposal for **plaice**.

See Annex 1 for a summary of the ICES advice and more detailed comments on 2015 fishing opportunities in the Baltic Sea.

Finally, we urge you to progress, without any further delay, the deep-sea file in order to ensure sustainable management of deep-sea fisheries and the protection of vulnerable marine ecosystems in the deep sea.

Yours sincerely,



Niki Sporrong
Director
Fisheries Secretariat (FISH)



Dr Monica Verbeek
Executive Director
Seas At Risk (SAR)