

Stockholm & Brussels, 27 September, 2011

To: The Fisheries Ministers of EU Member States

Re: Input to the EU Fisheries Council Meeting, 20–21 October, 2011

Dear Minister **xx**,

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 2012 (COM(2011)562). 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.

1. Proposal for a Council Regulation 'fixing for 2012 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea

We welcome the Commission proposal which is in line with both scientific advice and international and EU commitments to sustainable management of fisheries resources.

In relation to potential fishing opportunities for 2012 in the Baltic Sea, we would particularly like to highlight the developments for Baltic salmon which continues to be alarming. Post-smolt survival rates are down to around 10–15 percent and last year's dramatic declines in the number of fish returning to spawn have again been recorded for several important rivers. One of the major obstacles to sustainable management of salmon is the current practice of allowing offshore fisheries on mixed stocks, which makes protection and restoration of weak wild populations almost impossible. Adding to the problems of low post-smolt survival and low numbers of returning spawners is the suspected high levels of misreporting of salmon as sea trout. According to ICES this may constitute around 37% of the total catch in the main basin.

We would also like to emphasize the need for more conservative fishing opportunities for several of the pelagic stocks, as proposed by the Commission, in order to reach Maximum Sustainable Yield by 2015 and ensure the basis of future profitable fisheries.

Finally, there is now a pressing need for a revision of the multiannual plan for Baltic Sea cod, including a revision of the target for the Western stock. The current deadlock on multiannual management plans needs to be resolved and the recent proposal for Baltic salmon will be a litmus test.

Regarding fishing opportunities in the Baltic Sea for 2012, FISH and SAR call on you to fully support the Commission proposal.

See Annex 1 for more detailed comments on 2012 fishing opportunities in the Baltic Sea.

Yours sincerely,



Niki Sporrang
Director
Fisheries Secretariat (FISH)



Monica Verbeek
Executive Director
Seas At Risk (SAR)