



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels,
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Mr Reine Johansson
Baltic Sea Regional Advisory
Council
H.C. Andersens Boulevard 37,
1553 Copenhagen
Denmark

Subject: BS RAC recommendations for a multiannual plan for pelagic stocks in the Baltic Sea

Dear Mr Johansson,

I would like to thank the BSRAC for its constructive response to our non-paper on the development of a multiannual plan for pelagic stocks in the Baltic Sea. I am particularly pleased to know that the non-paper was so well received, and that the RAC considered that the questions it raised were very relevant. We will try to adopt a similar approach in our future consultations.

I find that there is much that we agree on, and I'm sure that with continued discussion we will arrive at a multiannual plan that finds the right balance between the needs for conservation and the economic needs of the sector. My comments on some of the specific points you mention are as follows.

Objectives and targets

I agree on the importance of distinguishing between objectives and targets. Objectives should reflect the reasons for which the plan is considered to be necessary. Targets, on the other hand, should be the specific goals fixed by the plan that would ensure that the objectives are achieved over a well defined period of time.

I agree with the opinion of the RAC that the uppermost objective of the plan should be biological. This implies that the targets should also be biological. Social and economic benefits could be considered as secondary objectives of the plan, though defining corresponding targets would be the competence of the Member States.

I also agree with your view that the biological targets should be primarily based on fishing mortality, such as F_{msy} , as they would be less sensitive to environmental changes than biomass targets. The values of fishing mortality at F_{msy} are nevertheless likely to change over time as environmental factors (including the relative abundances of other species) affect growth and natural mortality rates, and this must be catered for in the plan.

I note your view that targets to limit discards and by-catch are unnecessary because by-catch levels in the pelagic fishery are low. However, there are indications that cod by-catches are increasing, so further measures may become necessary. We remain open minded about what the most appropriate instruments would be, whether as part of the pelagic plan or through the technical measures regulation.

Gulf of Bothnia

We accept that there is no evidence that the management of the two stocks under one TAC has caused any problems for the smaller Bothnian Bay stock, possibly thanks to the natural limitations on fishing mortality imposed by ice cover and the difficulties of access of large vessels. Nevertheless, we share your view that a better assessment of the state of the Bothnian Bay stock is needed. This is something that we intend to pursue with ICES. I believe that we must avoid complacency, and be ready with measures to protect the Bothnian Bay stock based on the best available scientific advice.

Scope of the plan

I note the view of the BS RAC the western Baltic herring stock should be part of the management plan for the other stocks in the Baltic. I agree that this is desirable, even though the stock is partly fished in the Skagerrak together with fish from the North Sea stock. We have already submitted a joint EU-Norway request to ICES for an analysis of the spatial and temporal overlaps of the two stocks, and for methods of fixing the TAC in the Skagerrak taking account both the existing EU-Norway management plan for the North Sea stock and the proposed plan for the Baltic stock.

Russia

The Commission appreciates the support of the BS RAC in its efforts to establish closer co-operation with Russia. The second session of the Joint Baltic Sea Fisheries Committee was held in Brussels on 21 – 22 June, during which Russia was invited to co-operate in the development of the long term plan for pelagic stocks. This was very much welcomed by Russia, which offered research vessel time for joint surveys with shared costs.

Harvest control rules and technical measures

The EU is committed to achieving MSY by 2015. The arguments in favour of this approach are many, and indeed fishing at no more than F_{msy} would be sufficient to address many of the environmental and economic problems that we now face. However, as I mentioned earlier, the values of fishing mortality corresponding to MSY are subject to change, either because the estimates have been improved, or because environmental changes shift the real values through changes in growth and mortality rates.

I note your view that the mesh size restrictions should be removed for the pelagic fisheries, and that we should include a "move-on" requirement if cod catches exceed a certain threshold. We will request scientific advice on the implications of these ideas.

Monitoring and follow up

We will continue to encourage a closer collaboration between scientists and stakeholders. The JAKFISH project is a good example of this, but I agree that contact and co-operation should be developed further. The BS RAC's feedback on the MRAG report is much appreciated, and will help improve the analysis of the socio-economic implications of our proposals in the future.

This note is necessarily brief, so only touches on a number of important points that require further discussion. I look forward to our continued exchange of ideas, and count on your continued cooperation to develop a multiannual plan for pelagic stocks in the Baltic Sea that will ensure the sustainability of the stocks and the economic well being of the industry.

Yours sincerely,



Lowri EVANS