



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

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R. J. Johansson  
Chairman  
Baltic Sea Advisory Council  
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Dear Mr Johansson,

Thank you very much for the BS RAC recommendations on the fisheries for Baltic Sea fish species in 2009.

The overarching principle for the setting of the TACs is ensuring highest sustainable yields in the long-term while limiting socio-economic impacts on the sector to a minimum. Following this principle the Commission has developed its proposal on the basis of its policy statement and the scientific advice for 2009 by ICES and STECF, taking thoroughly account of the recommendations that the RAC has provided.

I appreciate the general tendency in the RAC to support the management plan for the two cod stocks in the Baltic Sea. The application of the plan is showing first positive results for the Eastern cod stock and in light of the strong recruitment entering this stock, this might be a window opportunity for a full recovery of this stock presupposed that the plan will be further complied with in the upcoming years. This means however, not only that the TAC has to be set accordingly but also that the fishing effort as long as fishing mortality is above target.

While fishing mortality might fall below target in 2009, it remains more than 10% above this year. The Commission is therefore proposing a reduction in fishing days by 10% in accordance with the plan. STECF has estimated that the resulting number of days would correspond to a fishing mortality above the actual target and allow for almost the double amount of landings. As misreporting remains a concern in this fishery, the reduction is therefore also seen as a complementary measure to enhance controllability.

For the Western cod stock the situation is contrary to the one in the Eastern Baltic. The TAC for 2008 has been fixed higher than the Commission had proposed in line with the plan, at a level for which a further decline of the stock had been forecasted already last year. Under current conditions the plan allows for a maximum reduction of 15% which the Commission is accordingly proposing as a minimum measure, noting however that a further decline of the stock might occur in 2009 due to the low incoming recruitment.

We have examined the other issues you presented on cod and come to the following conclusions:

- A request to STECF will be drafted to evaluate cod catches for vessels using gill nets with mesh sizes above 220mm. In case the observation of the RAC is confirmed, derogation for this gear category will be considered as part of the annual fixation of effort limits.
- Evaluations of the questions concerning the management of areas and the derogation for vessels below 12m will form part of the review of the plan which is foreseen in its third year of application.
- The 8% tolerance rule of the logbooks will be revised as part of the current review of the control regulation.
- An evaluation of the selectivity of demersal trawls has already been undertaken by ICES and STECF on request by the Commission. The outcome of these studies together with the resulting recommendations for further actions will be presented to Member States in the following weeks and the written report provided to the RAC. Your suggestion to initiate a joint research programme is very interesting in light of the Commission's discard policy and an outline of your ideas in this regard would be highly welcomed.

The TAC for plaice is proposed in line with the policy statement which foresees in a situation where no STECF is given to reduce the TAC to actual catches unless Member States develop an implementation plan to provide advice. Neither ICES nor STECF are currently in a position to give a scientific advice for this stock due to a lack of data. The Commission does not share the position of the RAC that the lack of a scientific advice could be interpreted as no signs of changes in a stock.

Turning to the pelagic stocks I would like to point out the overall change indicated in the scientific advice for these stocks. While most pelagic stocks have benefited from over average recruitments in 2002/2003, subsequent year classes entering the stocks now are much lower being in some cases even below average. Corresponding changes in the TACs are kept within the 15% limit for all stocks except for the Western Herring. The stock continues to be around the lowest level observed while recruitment for this stock is showing a continuously declining trend having reached the lowest observed level while fishing mortality remains about double the sustainable level. The TAC adopted for this year was well above the scientific recommendations. In light of the declining trend in this stock the scientific advice calls now for even stronger reductions than last year. Being aware of the economic importance of this stock and the impacts of a drastic reduction in the TAC, the Commission therefore asked STECF to advise on a suitable TAC in light of the politically agreed 50-50 split of the TAC between the North Sea and the Baltic and the TAC rules in the policy statement.

STECF confirmed ICES's advice that a drastic reduction in the fishing mortality would be necessary in light of the stock development. A reduction in the TAC by 15% as recommended by the RAC would mean a significant increase in fishing mortality and result in a decrease of the stock beyond observed levels according to the scientific advice. The Commission will follow the scientific advice and cannot agree with this recommendation.

With regards to salmon, the Commission has noted the upwards change in the estimate of the post-smolt survival in the scientific advice. Overall advice for the salmon in the Main basin is however to limit landings to the reduced catches that are expected in 2008 while

for the Gulf of Finland the advice remains unchanged that no catches of wild salmon should occur. In light of this advice and with total catches in the main basin below 60% of the TAC and uptake of individual national quotas below 70% in 2007 the Commission has decided to propose a reduction of 15% for both areas in line with its policy statement.

At the same time preparatory work for the development of a management plan for salmon is in progress and completion of the scientific basis is expected in November. Following careful analysis of the advice the Commission will then prepare a first outline of a potential concept for this plan and organise a stakeholder workshop to discuss the way forward. The RAC will be kept closely informed about this process.

I thank you again for your recommendations and remain

Yours sincerely,



Fokion Fotiadis