



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels, 15.09.2009 D 10339
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Baltic Sea RAC Secretariat
H.C. Andersens Boulevard 37, III
553 Copenhagen V
Denmark

Subject: Fishing opportunities for 2010

Dear Ms Milewska and Mr Johansson,

Thank you very much for providing the BS RAC recommendations for the fishery in 2010, which my services have carefully reviewed and taken into consideration in drawing up the proposal for the Baltic TACs and quotas for next year.

The project on selectivity in the Baltic cod fishery you describe in the letter of 30 June, in addition to the recommendations on TACs, sounds very interesting, especially since the Commission has made reducing and eradicating discards one of its current top priorities. I understand that you have already entered into closer contact with the relevant unit in DG MARE and I am looking forward to hearing more about the further development of this initiative.

I regret that the timing of the advice for herring in SD 22-24 was not conducive to drawing up a recommendation on this particular stock prior to the finalisation of the proposal. However, I can confirm that the recommendation you provided on 3 September will be taken into account during the decision-making process, which will start on 10 September. Furthermore, we will ask ICES and STECF to adjust the preparation for the advice on this stock to the timing for the advice on Baltic stocks from next year onwards.

Concerning the ICES working group on salmon, I would like to inform you that in principle all ICES working groups are open to RAC attendance as an observer, while it is up to ICES to decide whether parts of a given meeting should be closed to the public. My service will follow up on the experience the BS RAC Members had this year to ensure that this principle is respected.

The proposal for the Baltic TACs was published on 3 September. It is based on the principles outlined in the Communication on Fishing Opportunities 2010 and the multi-annual plan for cod stocks in the Baltic Sea. The proposed TACs are in line with the general thrust of the scientific advice. However, changes in the proposed TAC were restricted by the agreed 15% limit, where maintainable, in light of the respective stock status.

For the two Baltic cod stocks, I am glad to see that the RAC supports the management plan and the TACs that result from its application for 2010. Here I can only reiterate that continuing the strict application of the plan in light of the positive trend in recruitment will present a window of opportunity for a full recovery of the stocks, so that they can provide the highest sustainable catches in the long term.

I have also taken note of your advice on the management of effort with regard to the small-scale fleet. The planned review of the management plan next year will be the right opportunity to evaluate the need for some adjustments to the established system. Meanwhile, it will be up to Member States to allocate available effort in the most efficient way.

Responding to your request to exclude gears with a mesh size exceeding 220mm from the fishing effort regime of the cod plan, I would inform you that STECF has assessed the data provided by the Member States and considers that such exclusion would have minor implications on the cod stock. STECF has, however, also pointed out that it might have a negative impact on the turbot stock, if the low landings of turbot are due to low stock levels. Although the turbot fishery is not related to the cod plan, it will be important to assess what the implications of such exclusion will be on other species prior to taking a decision thereon. This issue will be addressed further as part of the review of the cod plan next year.

For plaice, the Commission is concerned about the lack of scientific advice for this stock. However, as the current TAC does reflect actual catch levels, a roll-over of the TAC has been proposed in accordance with the advice from the BS RAC.

As for pelagic stocks, the Commission agrees that most are stable; however, our conclusion from the scientific advice is that, despite their having been above average in the past, incoming recruitments are now lower. Following the precautionary principle and the objective of managing fishing mortality at levels which provide the maximum sustainable yield, -15% reductions in the TACs are therefore proposed for the central herring stock and sprat, in line with our policy – although the scientific advice had recommended steeper reductions.

For herring in the Gulf of Riga and herring in SD 30-31 alike, increases in the TACs of 6% and 25% respectively have been proposed. The increase in the Gulf of Riga TAC by management area follows the scientific advice for the stock, taking account of the exchange with the central herring stock. Although the RAC has advised a roll-over for the Gulf of Riga only, I take it that this increase will be acceptable. With a difference of only 1%, the proposal for herring in SD 30-31 is basically in line with the scientific advice and the BS RAC recommendation. I am confident that this will make it possible to address the points you have raised regarding stock density-dependent effects and dioxin content, provided of course that the TAC is fully taken next year.

Developing a proposal for herring in SD 22-24 has not been an easy task this year. Besides the declining recruitment, which will strongly impact on the stock in the near future, fishing mortality is well above sustainable levels. However, we are aware of the economic importance of this stock and have thus tabled a much lower reduction in the TAC (21%) than that advised by ICES (31%), corresponding to a roll-over in fishing mortality. I hope you can agree with me that increasing fishing mortality on a stock which might strongly decline in the near future and for which fishing mortality is already above

sustainable levels is difficult to justify. Should ICES confirm an increasing trend in recruitment we will, of course, take this into account.

With regard to salmon, since catches in 2010 must be related to smolt production in 2015, it is reasonable for ICES to use a reference point for the population size that corresponds to the maximum sustainable yield, irrespective of the existence of a management plan. In their advice on a new management plan, ICES has concluded that 60-80% of the potential smolt production would correspond to a maximum sustainable yield target for the different rivers and that a reference point should be set at at least 75%.

For salmon in the Main Basin, the proposed reduction of 15% is a gradual response to the advice to limit the TAC to actual catches. The TAC will then still be above current catches for each Member State. The Commission is aware of the implication of having an allocation key that no longer mirrors the actual uptake of salmon in this area, but would remind the RAC that swapping quotas between countries could easily resolve such difficulties. The TAC is aimed at setting a maximum allowed catch without jeopardising the integrity of the stock, and should as such be in line with actual fishing mortality. Evaluating the usefulness of relative stability is one of the issues that the Commission has highlighted for discussion in the CFP reform process.

For the Gulf of Finland no catches of wild Estonian salmon are advised. With the current available information, the Commission considers that this problem cannot be addressed by a reduction in the TAC, since the problem is mainly based on river conditions and fisheries. The TAC therefore remains unchanged, while the problem will have to be addressed internally by the Member States concerned and as part of the salmon management plan.

Yours sincerely,



Fokion Fotiadis