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From:	General Secretariat of the Council
To:	Delegations
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Subject:	Proposal for a Council Regulation fixing for 2022 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea, and amending Regulation (EU) 2021/92 as regards certain fishing opportunities in other waters. - Finnish comments

Delegations will find attached written comments by the Finnish delegation on the above-mentioned document.

The Finnish delegation / 7.9.2021

Written comments on the Commission proposal for Baltic TACs 2022

The Commission's proposal is still being analyzed and only preliminary positions can at this stage be given on the proposed TACs. The starting point for Finland is the MSY objective and the setting of TAC:s in accordance with the Baltic multiannual plan.

The Gulf of Bothnia herring stock

Finland supports the proposal of the Commission of a TAC of 111 345 tons. It is based on the ICES advice and the Fmsy point value.

The Main Basin and Gulf of Finland herring stock

Finland is of the opinion that the TAC should be set at 71 939 tons (EU TAC 62 353 tons) based on the ICES advice and the Fmsy point value. This would be in conformity with the Baltic plan. The ICES advice indicates that with this TAC the stock size would increase towards the Btrigger value and exceed it in 2023. Finland can hence not support the Commission proposal, which is based on the Fmsy lower value.

Finland has in June 2021 adopted a national measure to implement a stricter margin of tolerance rule in the reporting of mixed herring and sprat catches. Finland suggests a similar measure for all Member States in the Baltic, since the outcome of the Control Regulation reform with a comparable provision will not be applicable during the fishing season 2022. National measures would reduce significantly the misreporting of herring/sprat that ICES has indicated and would be an important step for the strengthening of the Main Basin herring stock in 2022.

The sprat stock

Finland supports the use of the ICES advice and the MSY point value which would give a TAC of 291 745 tons (EU TAC 262 337 tons). Finland can hence not support the Commission proposal, which is based on a rollover of the 2021 TAC. A large sprat stock could have negative effects on the development of the herring stock.

Finland would not support use of the Fmsy upper range for the sprat stock since it is very important to keep the stock eligible for the inter-species flexibility mechanism in Article 15.8 of the Basic Regulation 1380/2013.

The eastern cod stock

Finland supports the Commission´s proposal on the setting of a bycatch TAC of 595 tons for the eastern cod stock. Finland emphasizes the importance of Member States committing to swaps to avoid cod becoming a choke species for Member States with small quotas.

The possibility for directed scientific fisheries for cod should also be maintained as proposed by the Commission.

The plaice stock

Finland supports the setting of the plaice TAC in accordance with the ICES advice. It is however important to use selective trawls that allow for flatfish fisheries and the simultaneous escapement of cod.

Sea trout offshore prohibition

Finland emphasizes the need to continue the prohibition of offshore sea trout fishing as proposed by the Commission.

Cooperation within BALTFISH

Based on these and more detailed positions Finland is together with its partners in BALTFISH working for a common position concerning all the Baltic TAC:s and other effective management measures.