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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. - Polish comments

Delegations will find attached written comments by the Polish delegation on the abovementioned document.

Preliminary written comments from Poland on the proposal 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

Poland has concerns regarding the Commission's proposal.

The state of fish stocks in the Baltic Sea and its recovery are extremely important for Poland. However, decisions on fishing quotas should take the socio-economic aspect into account to a much greater extent. In accordance with its aim, the common fisheries policy should contribute to ensuring a balance between social, economic and environmental factors.

In Poland's view, the situation in the Baltic Sea is increasingly difficult. Business uncertainty is compounded by the fact that there is still no scientific advice for the western cod and salmon stocks.

There is a case for not maintaining too high a population of sprat, as this may have a negative impact on the reproductive potential of cod, particularly in the case of eastern cod, the recovery of which is sought by all countries in the region. This scenario is supported by the available ICES advice, which suggests fishing at FMSY levels. Since sprat feed on larvae, an increasing sprat stock size has a direct impact on the condition of the cod stock.

Moreover, in Poland's view, such a significant reduction in the quota for central herring is an excessive year-on-year escalation, and Poland calls for a more moderate reduction in the fishing quota for this species.

In addition, Poland considers that derogations from the prohibition on fishing with any fishing gear should be appropriately adapted to the different fishing areas with different water depths close to the coast.

At the same time, Poland would point out that the recovery of the eastern cod stock cannot be achieved solely by introducing a ban on targeted fishing and establishing a closed season. As the ICES advice indicates that natural mortality is the main cause of the stock's poor condition, appropriate steps need to be taken to reduce the impact of this natural mortality on the cod stock.

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