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From:	General Secretariat of the Council
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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. - Estonian comments

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

Preliminary comments by Estonia on 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

As a general note Estonia supports scientific approach as we see this as the most reliable way to maintain healthy fish stocks and restore them where needed. Scientific advice is based on the best available knowledge and we have the privilege to use it in management for several fish stocks in the Baltic Sea.

With that said, we support Commission proposal on the stocks with proposed TAC levels that correspond to EU Multiannual Plan F_{msy} and ICES advice. Also, we are especially happy about the healthy state of herring in Gulf of Riga. At the same time we don't agree with such a drastic deduction of TAC for central Baltic herring and rollover for sprat.

In addition to keeping the stocks healthy, MSY values in scientific advice are also given with the purpose to improve poor stocks. Hence, we are of the opinion that using MSY level in herring fisheries management in 2022 is not closing the door on the recovery of central Baltic herring. Moreover, we would like to note that EU MAP F_{msy} (0,17) is already more conservative than F_{msy} point value (0,21). Taking all that into account it is unclear what would be the actual benefit of such a TAC reduction or how much earlier the herring stock would then recover. Choosing F_{lower} over F_{msy} would result in gain of only 4% in change of SSB levels between 2022 and 2023. At the same time, an additional TAC reduction of 18% hits the fishermen quite hard.

There is another problem stemming from a larger deduction that the scientific advice, which is the connection between sprat TAC because of herring-sprat mixed fisheries. The Commission proposes TAC levels for herring and sprat that would result in catch composition of approximately 16% herring and 84% sprat as a whole in 2022. If levels of scientific advice were to be used the relationship would be around 19% vs 81% of herring and sprat respectively, which is significantly closer to the rough estimation of catch composition in real catches. Thus, the negative impact on fisheries from 54% deduction of central Baltic herring would be amplified even further, as such a small TAC for herring would start limiting sprat catches.

Regarding sprat we would like to note that while sprat is indeed a food object for cod, it does not seem to be a supporting argument for sprat rollover at this time. Looking at the data showed in ICES advice it seems that periodic rises in sprat spawning stock biomass and recruitment levels have not resulted in rises in cod SSB and recruitment during recent years. It may very well be that when (or if) the cod stock recovers the predator-prey relationship between these two species will be better noticeable in the data again but given the poor status of cod stocks we consider it unlikely that the sprat abundance is the key limiting factor for cod stock status. There are a number of other biotic and abiotic factors that hinder the recovery of cod stocks.

In conclusion, Estonia would like to see TACs for central Baltic herring and sprat that correspond to the EU MAP F_{MSY} level.