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From:	General Secretariat of the Council
To:	Delegations
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No. Cion doc.:	COM 491/2021 final
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. - Lithuanian comments

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

Lithuanian written comments on the 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
Reference: COM (2021) 491 final

Lithuanian authorities still examining the Commission's proposal, therefore the submitted position is preliminary. Lithuania retains possibility to provide additional comments on this proposal in the coming weeks.

General remarks

Lithuania supports the objectives of the sustainable fisheries in the EU, but maintains reservations on the proposed Total allowable catch (TAC) levels in the Baltic Sea for the next year. Main priority for Lithuania is equal treatment of all pillars of sustainability and the maintained viability of vessels fishing in the Baltic Sea. Consequently, Lithuania considers that TAC levels for the stocks in the Baltic Sea should be set on the right balance between prudence and stability for the sector. Therefore, Lithuania encourages to rely on the most optimal levels of scientific recommendations to reach that balance.

Cod (Subdivisions 25-32)

Lithuania supports the proposal on the setting of a bycatch TAC for this stock.
At the same time, Lithuania is concerned about Russia's actions on Baltic Sea fisheries management. All EU countries are making great efforts to conserve and sustainably use resources in the Baltic Sea. The Russian side applies targeted Eastern cod fishing, and unilaterally sets much higher than scientific recommendations and its historical share of TAC fishing opportunities for herring and sprat.
Therefore, we call the Commission to renew the dialogue with the Russian counterparts on the management of the Baltic Sea stocks.

Herring (Central basin)

Pelagic fisheries in the Baltic Sea remain one of the few stable and viable sectors; therefore, Lithuania cannot support drastic reduction of the TAC proposed by the Commission. Scientific recommendations give the room for a manoeuvre to avoid drastic fluctuations.
Lithuania is prepared to strengthen the control of the pelagic fisheries, in terms of reviewing criteria, risk assessment and enhancing the capacity of control.

Sprat (Subdivisions 22-32)

Lithuania is not in the position to support Commission proposal to maintain 2021 TAC level. Since, according to the scientists this stock is in a good shape, Lithuania is of the opinion that this stock could be lifesaving one for the pelagic fleet. Lithuania proposes to increase the TAC setting it according to the scientific advice and in line with Baltic Multiannual Plan.