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NOTE

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. - Latvian comments

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

Latvia' s 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

Latvia thanks the European Commission for the timely 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* (hereinafter - the proposal for a Regulation) and the discussions initiated on it, but at the same time wishes to make the following comments.

Latvia calls for a smaller reduction in the fishing opportunities for herring in the central Baltic Sea. Such a high negative difference (- 54%) of fishing opportunities in one quota year is critical for fishing sector given that the ICES advice within the framework of MSY values already provides radical fishing opportunities reduction (- 36%) for this stock.

At the same time, Latvia also calls for the highest possible increase in sprat fishing opportunities (+18%) which is corresponds to the values allowed in ICES advice for this stock. The reasoning provided by the Commission for freezing of the fishing opportunities for sprat do not substantiated with relevant scientific data - cod stocks is at very low level to be restricted from active feeding on a very healthy sprat population and is not relevant to the limited part taken by fisheries ; bycatch of herring could not be excuse to set the TAC at a level proposed by ICES, because such changes of the different bycatch stocks are observed every year and fisherman always should accommodate to such conditions by planning their activities, changing fishing areas, making quota swaps etc.; the sprat is too short living species to try save it for future fishing seasons, instead of that the part of valuable economic resource would be lost.

In any case Latvia would like to stress that the best allowable fishing opportunities figures for these stocks as it is provided by ICES should be respected in both directions - in positive and in negative, while they are based on relevant stock assessment, MSY principles and independent advice of ICES.

Given the significant reductions of fishing opportunities already for many years in line, the revision of these two-stock proposed TACs could also be seen as a socio-economic assurance to mitigate the

devastating effects of the last huge reductions of the Baltic Sea fishing opportunities to the fishing industry.

At the same time, Latvia emphasizes that these are Latvia's initial comments, given that no information is available on fishing opportunities for all stocks. Latvia expresses great concerns about the missing stocks and asks the Commission to fill the gaps as fast as possible, therefore it reserves the right to make additional comments after the publication of the currently non-existent figures.