



Council of the  
European Union

Brussels, 15 September 2022  
(OR. en)

12479/22

LIMITE

PECHE 322

---

---

**Interinstitutional File:  
2022/0244(NLE)**

---

---

**NOTE**

---

From: General Secretariat of the Council  
To: Delegations

---

No. prev. doc.: ST 11877/22 + ADD 1 PECHE 290  
No. Cion doc.: COM 415/2022 final

---

Subject: Proposal for a Council Regulation fixing for 2023 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea, and amending Regulation (EU) 2022/109 as regards certain fishing opportunities in other waters  
- Latvian comments

---

**DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (02.12.2022)**

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

**Latvia's comments on Proposal for a Council Regulation fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2023 and amending Regulation (EU) 2022/109 as regards certain fishing opportunities in other waters**

Latvia welcomes the Commission's proposal for the fishing opportunities in the Baltic Sea and could support it with exception for one stock and request for better flexibility for another one.

Latvia asks to set the fishing opportunities for sprat higher than in current proposal where the Commission asking for 20% reduction. As there are very limited fishing opportunities still available in the Baltic Sea and only for pelagic species, this in combination with extraordinary situation caused by war in the Ukraine and drastic rising of production costs has a very serious impact on the earnings from fishing activities and directly influence living conditions of Latvian and other Member states fishers' communities.

The arguments used by the Commission for higher TAC reduction then the FMSY point value for sprat is not credible and those arguments were already assessed by the science when formulating the advice for sustainable fishing opportunities levels. Therefore, Latvia advocates to use scientifically grounded FMSY point value and not to punish fishers more than it is appropriate and feasible.

**DELETED**

Latvia is thankful to the Commission for proposed increase of fishing opportunities for the Baltic Sea Main basin herring stock (subdivisions 25-29, 32, excl.28.1) and could accept it, however is looking forward for possible flexibility of additional TAC increase in line with needs for recovery of this stock, but also recognising hard situation in pelagic fishery operations as described above.