



Council of the
European Union

Brussels, 18 September 2023
(OR. en)

Interinstitutional File:
2023/0301(NLE)

13056/23
ADD 1

LIMITE

PECHE 363

NOTE

From: General Secretariat of the Council
To: Delegations

No. prev. doc.: ST 12451/23 + ADD 1

Subject: Proposal for a COUNCIL REGULATION fixing the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea for 2024 and amending Regulation (EU) 2023/194 as regards certain fishing opportunities in other waters
- Written comments by Estonia

Delegations will find attached written comments by the [Estonian delegation](#) on the abovementioned proposal.

Estonian 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 2024 and amending Regulation (EU) 2023/194 as regards certain fishing opportunities in other waters

Estonian delegation would hereby like to put forward some preliminary comments on the proposal. Final position depends on the outcome of internal discussions that are still ongoing and can be finalised only after the proposal itself is complete.

As a general note, we would like to stress that Estonia has always been a keen supporter of scientific approach and we continue to believe that basing our decisions on best available scientific advice and the Baltic multiannual plan (articles 4 and 5) is the only way in fisheries management.

Central Baltic herring

We cannot accept Commission proposal to close targeted fisheries. ICES advice clearly sets a TAC range for targeted fisheries and this should be the basis for decision-making here. ICES advises that when Baltic MAP is applied, the TAC should be set between 41 706 – 52 549 t. We understand the situation of the stock and are ready for a harsh reduction, but we do not agree with a full ban. We would also like to stress that the stock fell below Blim because of the benchmarking exercise and we do not agree with Commissions reading on the Baltic MAP art 4(6) versus art 5. In our opinion, if art 4(6) would prevail over art 5, it would mean that targeted fisheries should always be closed and art 5(2) is completely redundant. This does not align with the overall aim of art 5 at all and we believe that setting the TAC based on art 4(6) in this case is completely unjustified, considering that the scientific advice does not propose closure.

We would also like to point out that the question on how to interpret articles 4(6) vs art 5 is a horizontal issue that touches upon all EU MAPs. We would hereby like to refer to Finnish written comments on the proposal and give our full support to these comments. In addition we also support Finnish comments on Bothnian herring.

Herring in the Gulf of Riga

According to the scientific advice the spawning stock biomass is on a good level and all conditions are fulfilled to apply F_{msy} . Thus, in our view it is appropriate to follow ICES advice which would correspond to 17% reduction compared to last year.

Sprat

Although we would like to use the opportunity to set the TAC according to F_{msy} level, we also understand the difficult situation with Central Baltic herring and issues stemming from mixed fisheries. Therefore we are ready for an additional flexibility that would correspond to a TAC reduction up to 10%.

Salmon in the Main Basin

Similarly to last year we would like to stress the need for simplification of rules on recreational fisheries. Scientists have now assessed the impact of recreational fisheries on the salmon stock. A rough generalisation can be made that for every fin-clipped/reared salmon, one wild salmon dies due to post release mortality. It is estimated that for that reason the mortality of wild salmon is 6500 specimen per year (see ICES WGBAST report, page 13). This kind of management regime fosters discards and we find it unreasonable. Moreover, in Estonia, the aim of restocking is restoring the populations to self-sustainable levels where stocking can be ceased. This means that not only wild salmon matter, but also reared salmon have a clear conservation value and should not be disregarded purely as entertainment for fishers.

To take all this into account, we propose again that it should be allowed to catch one salmon despite the origin (reared or wild) and then fishing for salmon should be closed for the day.