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General Secretariat

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**NOTE**

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From:	General Secretariat of the Council
To:	Working Party on Fisheries Policy
N° Cion doc.:	ST 12844 2024 ADD 1 + ST 12844 2024 INIT
Subject:	Proposal for a COUNCIL REGULATION fixing for 2025 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea and amending Regulation (EU) 2024/257, as regards certain fishing opportunities in other waters - letter from the Finnish delegation

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Delegations will find attached a letter from the Finnish delegation on the abovementioned subject.



15.10.2024

[REDACTED]

[REDACTED] Finland is concerned over the bycatch TAC levels for eastern cod, as we have expressed at the trilaterals and in bilaterals with the Commission. The Commission has pointed out that the bycatch levels should be set at a level to keep other fisheries open and that swaps should be undertaken in order to avoid choke situations, this in accordance with the Court ruling. We agree on this, especially the need for keeping other fisheries going and avoiding choke situations.

We have now looked at our by-catches of cod in the trawling for pelagic species in 2021-2024. As you can see from the table below our pelagic trawlers have reported bycatches of cod especially when fishing in SD:s 25 and 26, but also from some fishing trips in the Bothnian Sea (SD 30).

Our worry is that cod may end up in the pelagic trawls if our vessels fish in the southern Baltic or if unexpected cod aggregations cause larger bycatches of cod in the northern Baltic, which may happen at any time. Then the proposed 3 tons of eastern cod to Finland could immediately be exhausted and Finland would be faced with the necessity of a swap for more eastern cod or then with the need to prohibit pelagic trawling in areas where cod bycatches occur.

Furthermore we have analysed the catches of eastern cod per Member State and seen that the Commission proposal of 191 tons is somewhat smaller than the combined cod catches of all Member States (see graph 1 below). The catch data (see graph 2) also shows that some Member States would be in need of swaps, while other Member States could have limited amounts to swap. Hence there is a large risk that a 191 ton TAC would not leave adequate room for needs of swaps. This would not be in accordance with the Court ruling as it would be totally disproportional to the socioeconomic losses in the pelagic sector.

If the pelagic sector would have to be closed due to exhaustion of the 3 ton cod quota of Finland and following the unavailability of eastern cod quota for swaps it would cause an estimated close to 100 million euro socioeconomic loss in the whole pelagic sector with several hundred lost jobs. These jobs could be permanently lost since crews for trawlers and workers for processing plants would seek other jobs and it would be difficult to find new crews and workers if a fishery would be opened again.

In 2023, the Baltic herring and sprat catch amounted to around 84 000 tons and their value was approx. 25 million euros as producer prices. There are ten significant companies in Finland that process herring into food or fish meal. There are two fish meal fac-

tories and eight companies freeze, clean, fillet or further process larger quantities of Baltic herring. According to the financial statements, declarations by entrepreneurs and other available information, their turnover from herring are estimated to be 50-60 million euros, and herring processing employs around 100 people per year in these enterprises.

According to the statistics on international trade in fish, 39 000 tons of herring was exported in 2023 and its export value was approx. 17 million euros. Most of the exports go directly to Eastern Europe for food. In 2023 totally 2 800 tons of fish meal was exported from Finland and its value was 5 million euros, while fish oil exports were valued at 7 million euros. The exports of Baltic herring will reduce the trade balance deficit of fish. As a result of a pelagic fishing ban, the fish feed industry would also have to purchase fish meal abroad.

In connection with Baltic herring, more than 40 million euro has also been invested in fishing, processing aid and fishing ports. Return on investments would come to a halt, financing costs would run and interest rates would be high. In addition to financing costs, companies have a lot of fixed costs when their operations are suspended, such as rents that are impossible or difficult to get rid of.

Herring products also generate turnover in retail trade, but their value has not been estimated in this context. As a result of the fishing ban, consumers would no longer have the most affordable domestic fish option.

Finland therefore proposes a rollover for the eastern cod TAC or only a slight decrease. The fishing mortality is at a very low level and it is the natural mortality and the degraded state of the Baltic Sea that hinders the recovery of the eastern cod stock, not fishing activities. The more selective flatfish trawls could reduce the amounts of eastern cod bycatches, but this still needs to be verified in 2025.

I send a copy of this letter to the BALTFISH presidency as well as to the Council secretariat, in order to register the socioeconomic effects of the proposed bycatch TAC for eastern cod in 2025 and the resulting quota of 3 tons for Finland.

Best regards,



Source: [Kalamarkkinakatsaus 2024 \(luke.fi\)](#) (Review of the fish markets 2024 (in Finnish), Natural Resources Institute Finland.

Finnish bycatches of eastern cod in trawling for pelagic species 2021-2024.

Year	Month	Number of fishing trips	Sub-division	Catch of eastern cod in kg
2021	4	6	26	1889
2021	4	1	26	515
2021	6	3	30	0
2023	12	1	30	12
2023	12	1	30	11
2024	2	2	25	357
2024	5	1	30	24
2024	5	1	30	23

