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NOTE

From:	General Secretariat of the Council
To:	Delegations
No. Cion doc.:	11813/16 PECHE 296 + ADD 1 - COM(2016) 545 final + Annex
Subject:	Proposal for a COUNCIL REGULATION fixing for 2017 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea

Delegations will please find attached written comments by the Estonian delegation on the above-mentioned proposal.

ANNEX

Initial written comments from Estonia to proposal for a Council Regulation fixing for 2017 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea

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4. **HERRING** (subdivision 28.1). Estonia finds appropriate to set the TAC for the Gulf of Riga herring in 2017 in accordance to the F range in MAP Article 4 paragraph 4. b) (intra- or inter-species stock dynamics) and the applicable range provided in the Annex I column B, corresponding to the fishing mortality MSY Fupper=0.38. This corresponds to catches of 26770 t of the Gulf of Riga herring and the TAC for the Gulf of Riga management area in 2017 of 31121 t (26770+4574-223=31121). The TAC in 2017 will be for 10.9% lower than in 2016.

The spawning stock biomass (SSB) will still increase in 2018 compared to 2017 and in both years it will be well above MSY Btrigger. The development of total biomass and the spawning stock biomass of the Gulf of Riga herring strongly depend from the recruitment while the latter mainly depends from environmental conditions and there is no strong correlation between SSB and strength of the recruitment. The decrease of SSB in the last two years was due to appearance of two poor year-classes in 2013-2014 due to environmental conditions. However, the last studies performed during joint Latvian-Estonian hydro-acoustic survey in summer show that the 2015 year-class is rich and this will cause an increase of SSB in 2017. This was not taken into account in ICES advice because the studies were performed later. It should be also noted that the Gulf of Riga herring stock is in a good state for very long period of several decades. Application of F=0,38 keep the stock stable and at sustainable level while limiting drastic fluctuations of fishing possibilities between the years.

It should be stressed that the big increase of the stock size in the following years would be associated with slower growth and poorer food condition of herring. For relatively small sea area like the Gulf of Riga the food competition and negative stock dynamic tendencies will appear more rapidly. The data analysis show that there is already negative correlation (r=-0.75) between SSB and average weight of herring in age groups 2-7. Therefore the higher F rate 0,38 is sustainable and fully justified.

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