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European Union

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ADD 3**

**LIMITE**

**PECHE 339**

**NOTE**

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From:	General Secretariat of the Council
To:	Delegations
No. Cion doc.:	ST 11735/18 PECHE 320 + ADD 1 - COM (2018) 608 final + Annex
Subject:	Proposal for a COUNCIL REGULATION fixing for 2019 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea

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

**Initial written comments by the Estonian delegation****Proposal for a Council Regulation fixing for 2019 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea**

We welcome the Commission's proposal for a Council Regulation fixing for 2019 the fishing opportunities in the Baltic Sea. As the discussions are still undergoing domestically and regionally in the BALTFISH Estonia reserves its right to present final positions at a later stage. As a principle, we prefer the gradual approach towards MSY to avoid high fluctuation on TACs year by year basis. In general, we support the strategy to manage fisheries on the basis of multiannual plan for the stocks in the Baltic Sea and the ranges set out therein.

At this stage Estonia would like to highlight its position on some of the most important stocks for Estonia covered by this regulation.

1. **COD** (subdivisions 25-32). A decrease is necessary. Estonia is flexible on Commission's proposal (-15 %).
2. **COD** (subdivisions 22-24). Estonia prefers precautionary solution, however we remain flexible in a certain extent.
3. **HERRING** (subdivisions 25-27, 28.2, 29 and 32). We regret that the biomass of the stock has been overestimated. To avoid high fluctuation of the quota it should be possible to apply -20% under the stability clause according to the Art 4 para 4 c) of the Baltic MAP. We find that the proposed decrease of 26% is a bit too high and does not guarantee stability for the sector.
4. **HERRING** (subdivision 28.1). Estonia supports the Commission proposal.
5. **HERRING** (subdivisions 22-24). The TAC should lead to the increase of the biomass.
6. **SPRAT** (subdivisions 22-32). Estonia supports the Commission proposal.

7. **SALMON** in main basin. Misreporting of the catches is of our concern. All efforts should be made to get fishing and reporting under control.

8. **SALMON** (subdivision 32). Salmon in Gulf of Finland is a by catch species as well as possible choke species, it is taken as a bycatch in coastal gillnets fisheries. The scientific evidences show that Gulf of Finland salmon migrates to the main basin and even in a bigger extent vice versa. This means that management area (TAC area) does not correspond properly to the distribution of the fish in reality. Therefore certain inter-area flexibility from main basin to Gulf of Finland is justified and needed. Specific footnote (special condition) should be added to the Main Basin salmon table allowing to fish up to 15% of the main basin salmon in the Gulf of Finland. This flexibility should be applicable to the Members States who have quota for salmon in both areas. This solution is used in numerous cases in the main TAC and quota regulation. In this case the impact is limited on the Gulf of Finland stock. Our proposal is as follows (written in bold).

Species:	Atlantic salmon	Zone:	Union waters of
	<i>Salmo salar</i>		Subdivisions 22-31
			(SAL/3BCD-F)
Denmark	21758	(1)	
Germany	2421	(1)	
Estonia	2211	(1) <b>(2)</b>	
Finland	27130	(1) <b>(2)</b>	
Latvia	13839	(1)	
Lithuania	1627	(1)	
Poland	6600	(1)	
Sweden	29410	(1)	
Union	104996	(1)	

TAC

Not relevant

Analytical TAC

Article 3(2) and (3) of Regulation  
(EC) No 847/96 shall not apply.

Article 4 of Regulation (EC) No  
847/96 shall not apply.

(1) Expressed by number of individual fish.

**(2) *up to 15% of this amount may be fished in Union waters of Subdivision 32 (SAL/3D32.)***

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