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NOTE

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

Delegations will find attached written comments by the Spanish delegation on the abovementioned proposal.

**COMMENTS BY THE SPANISH DELEGATION ON THE COMMISSION PROPOSAL
FOR A REGULATION FIXING FOR 2019 THE FISHING OPPORTUNITIES FOR
CERTAIN SPECIES IN THE BALTIC SEA****11735/18 and 11735/18/ADD 1 PECHE 320 of 31 August 2018**

Although Spain does not have a direct interest in fishing in the Baltic Sea, this proposal is very interesting insofar as it will lay the foundations for future proposals for fisheries that are very important for the Spanish fleet, such as those for Atlantic mackerel, Atlantic horse mackerel and hake.

Since 2006 there has been a departure from the general regulation on TACs and quotas, with the earlier availability of scientific reports, in an attempt to simplify the December Council meeting. Spain has for years been insisting that this departure makes no sense now that the ICES recommendations are ready for all species in the same period of time during the summer.

Once the multiannual plan for the Baltic stocks has been approved, the TACs and quotas are fixed with reference to the parameters and principles established in this plan, which determines a fishing mortality rate for each species. The multiannual plan itself is of limited relevance to Spain since we do not have any direct interest in the Baltic fisheries, as stated above. Nevertheless, it is worth pointing out the current dysfunction within the EU, in that the multiannual plans have already been approved for certain catchment areas and fishing grounds, such as the Baltic Sea or the North Sea, while such plans are still under preparation for other areas, such as the Western Waters. This does not prevent certain fisheries in the Western Waters from being managed taking into account the fishing mortality rates, insofar as ICES is able to provide them.

In this respect we wish to point out that Spain has always stressed the importance of maintaining the same criteria for all draft regulations on TACs and quotas, including that relating to species caught in North Atlantic waters.

On the other hand, we would be interested to know how full implementation of the landing obligation for all species is dealt with in the Baltic Sea, bearing in mind that, while it is a very complex matter in general for EU fisheries, each area has its own particularities and difficulties that require ad hoc solutions. For this reason it is important to us that the general criteria taken into account here be applied in future regulations for other fishing areas.

As for the proposals for TACs for the different species, the proposal for a Regulation provides for decreases in the case of some and increases in the case of others. We welcome the fact that the implementation of the CFP is producing results in the sense that there are stocks that are in good condition, which enables them to be exploited at levels producing the MSY.

In other stocks which are not in such a healthy condition, TAC reductions are proposed that amount in some cases, such as for Western Baltic herring, to a 63 % decrease on the TAC for 2018. Bearing in mind the need to manage those stocks in poor condition in a manner that allows them to recover, it is important to take into consideration the socioeconomic consequences of very significant TAC reductions which, when one looks at the particular case rather than the overall picture, may possibly lead to a fishing closure for certain specific fleets. In this connection, we believe that options must be considered that reconcile the necessary stock recovery with continued fishing activity so that economic activity is not destroyed.

Madrid, 4 September 2018
