NOTE
From: General Secretariat of the Council
To: Delegations
No. Cion doc.: ST 10274/20 PECHE 205 - COM(2020) 436 final
Subject: Proposal for a COUNCIL REGULATION fixing for 2021 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea, and amending Regulation (EU) 2020/123 as regards certain fishing opportunities in other waters
- Latvian comments

Delegations will find attached written comments by the Latvian delegation on the above-mentioned document.
Latvia’s written commentaries on the proposal for a Council Regulation fixing for 2021 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea and amending Regulation (EU) 2020/123, as regards certain fishing opportunities in other waters

Latvia understands the need to adopt the Proposal for a regulation in a timely manner as it is intended to promote the development of sustainable fisheries in the Baltic Sea. However, the drastic reductions in fishing opportunities for herring in the central Baltic Sea area and for both cod stocks pose significant difficulties in supporting this proposal.

Latvia has commentaries on several fish stocks (in order of importance):

**Eastern Baltic cod**

It is very important that the by-catch quota is not voluntary lowered. In a situation where directed fishing for cod will not be possible, fishermen will try to switch to non-quota species like flounder, where the by-catches of cod are possible. This could lead to an increase in cod by-catches, which must be taken into account and added to the TAC level for Eastern cod. Latvia emphasizes that the cod by-catch quota must be realistic in order to avoid a situation where the by-catch quota is exhausted at the beginning of the year and fishermen find themselves in a situation where it is not clear what to do with accidentally by-catch cod - discard or keep within the risk of penalty.

Therefore, Latvia considers that the by-catch of Eastern cod provided for in the project, which has been reduced by a very significant figure of 70%, would be too small to allow normal quota management and fishing operations on other target species (flounder, sprat, herring) as cod by-catch level could be exhausted quite soon during the fishing season.
**Herring in the central Baltic**

Latvia does not support such a sharp reduction in the TAC for herring in the Central Baltic Sea within one year, especially in view of the radical reductions in fishing opportunities and restrictions for both cod stocks. Latvia looks for a stepwise approach when necessary reduction towards MSY level could be achieved in several (two) years. In addition, Latvia points out that such a large reduction will also have a negative impact on the sprat fishery, where herring is used as a by-catch in mixed pelagic fishery. At the same time there is no justification to reduce sprat fishing opportunities.

**Western Baltic cod**

Latvia strongly urges the Commission to set the fishing opportunities for this stock at the same level as previous year and avoid further reductions. This also corresponds to the ICES advice and allows to keep Western cod at Fmsy level.

**Sprat**

Latvia calls for increase of the TAC compared to roll-over in the proposal, as the stock can be assessed as stable and an increase within the MSY range would not pose any threat to its condition.