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NOTE

From:	General Secretariat of the Council
To:	Delegations
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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 Latvian delegation on the above-mentioned proposal.

ANNEX

Latvia's comments on the Commission 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

1. [redacted]

2. Comments on most important fishing opportunities for Latvia

2.1. Herring in the Gulf of Riga:

During the BALTFISH High Level Group meeting in Frankfurt, Latvia and Estonia already reached common understanding regarding justification for lower reduction of TAC level for this stock as compared to the Commission's proposal.

According to the position already expressed in the BALTFISH meeting, Latvia proposes to set the TAC for the Gulf of Riga herring in 2017 at a level that corresponds to fishing mortality MSY Fupper=0.38 in accordance with the applicable range provided in the column B of the Baltic sea multispecies multiannual plan. 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 (including exchange with the Baltic Sea main basin: 26770+4574-223=31121). In this case 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 and even higher F=0,42 in previous years 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 feeding 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.

When setting the TAC for the Gulf of Riga herring the socio-economic consequences also should be taken into account. The Gulf of Riga herring is caught by the fleet of trawlers and by coastal fishermen using trap-nets. For both fleets herring is the main target species constituting 90-100% of the total catch. Therefore recommended 21% reduction of the TAC level would lead to critical consequences for local coastal communities. Already the Latvian proposal for 10.9% decrease of the catches will have a bad influence on the industry economic situation especially to the sector of coastal fishery for which the Common Fishery Policy (including the Basic Regulation) has defined a target to provide good economic situation. Besides there was a 10% decrease of TAC for this stock also in 2016. Too harsh TAC reduction in two consecutive years resulting in bad stock dynamics (slower growth and poorer weight conditions) should be avoided.

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