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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

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

Lithuanian written comments on the Proposal for a Council Regulation fixing for 2019 the fishing opportunities fish stocks and groups of fish stocks applicable in the Baltic Sea

Reference: COM (2018) 608 final– 31th August 2018

Lithuanian authorities wish to submit the following comments on the abovementioned proposal for a Regulation.

In general, we welcome the European Commission's proposal based on the principles of Common Fisheries Policy, provisions of the Baltic Sea Multiannual Plan and the guidelines envisaged in the Communication on the Fishing Opportunities for 2019.

We appreciate that European Commission has taken into consideration both scientific advice and socioeconomic issues and sought to provide a balanced proposal. However, we feel that the fishing opportunities and related conditions for certain fish stocks should be further adjusted in order to deliver the most suitable result.

Comments on opportunities of particular interest to Lithuania

1. Western cod (Union waters of Subdivisions 22-24)

Total allowable catch (TAC) increase that advised by ICES is only based on one year – 2016, that shows a strong year class. Besides, stock size indicators remain alarming: spawning stock size is below MSY $B_{trigger}$ and B_{lim} . Based on that we would support a cautious Commission's proposal to set TAC within the lower part of F_{msy} range.

2. Eastern cod (Union waters of Subdivisions 25-32)

We are greatly concerned by the prolonged deterioration of the stock status and the uncertainties in the latest scientific advice. Although TACs for Eastern cod have been reduced by almost 57% in 2014–2018 and catches in the recent years are at historically lowest levels, it is obvious that drastic reduction of fishing opportunities doesn't give the desired result and the stock is not showing recovery signs. Therefore, we could accept only a moderate reduction of the TAC, as proposed by the Commission.

Lithuania hopes that the upcoming benchmark will allow conducting an analytical assessment of the Eastern cod and will contribute to the long-term sustainable management of cod fisheries in the Baltic.

Lithuania is not in favour of the proposed fishery closure period ("summer ban") until we have not received the latest (up-to-date) scientific evidence of the positive effects and scientific recommendations on the most suitable timing of such closures on the cod stocks. However, Lithuania acknowledges that the Member States can establish a closure periods on cod fishery for their national Baltic Sea fleets.

3. Central herring (Union waters of Subdivisions 25-27, 28.2, 29 and 32)

We are concerned that despite the aim of Multiannual plan to ensure the MSY and stability of fisheries in the long-term perspective, this year we are facing the unexpected change in the scientific perception of Central herring stock, which results a proposed significant reduction of the TAC. Although according to ICES, Central herring stock is still in a good state. We do not support big variations of TACs based on changing scientific insights and resulting in serious consequences for the industry. In this regard, we welcome Commission's proposal to use the upper part of F_{msy} range when it is necessary to limit TAC variations between consecutive years. However, we would suggest reducing Central herring TAC by not more than 20 %, as foreseen in Article 4(4) (c) of the Baltic Sea Multiannual Plan.

4. Sprat (Union waters of Subdivisions 22-32)

We treat the TACs for pelagic stocks as a package, as both sprat and herring are usually caught in the mixed fishery. As was stated in ICES advice, the spawning-stock biomass (SSB) of sprat is well above MSY B_{trigger} and fishing mortality (F) has declined in the recent years. Therefore, taking into account mixed fishery, we suggest to apply Article 4(4) (a) of the Baltic Sea multiannual plan (upper part of F_{msy} range) and increase TAC for sprat by 6,7%.

We are looking forward to further discussions on this Proposal as well as a balanced agreement on the fishing opportunities in the Baltic Sea for 2019.
