



Council of the  
European Union

Brussels, 17 September 2018  
(OR. en)

12170/18

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**Interinstitutional File:**  
**2018/0320(NLE)**

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**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 Finnish delegation on the above-mentioned proposal.

**Written comments on the Commission proposal for Baltic TACs 2019**

The Commission's proposal is still being analyzed and only preliminary positions can at this stage be given on the proposed TACs.

**The Gulf of Bothnia herring stock (SD 30 and 31)**

Finland supports the proposal of the Commission of a TAC of 88 703 ton. It is based on the Baltic plan and the new Fmsy point value 0.21 for this herring stock.

**The Main Basin and Gulf of Finland herring stock**

Finland supports the proposal of the Commission concerning the herring stock in the Main Basin and Gulf of Finland. The proposal is in conformity with the Baltic plan and the use of the Fmsy upper value 0.28 is justified.

**The sprat stock**

Finland supports the proposal of the Commission concerning the sprat stock. It is based on the Baltic plan and the Fmsy point value 0.26 for this stock.

Finland would not support the use of the Fmsy upper value 0.27 for the sprat stock since it is very important to keep the stock eligible for the inter-species flexibility mechanism in Article 15.8 of the Basic Regulation 1380/2013. The use of a higher F in the TAC setting could lead to higher observed F values and thereby risk the availability of this important mechanism for the Finnish pelagic fleet.

**The salmon stocks**

Finland expects the TACs for the salmon stocks to be set in accordance with ICES advice including estimates of unwanted catch, unreported and misreported catch as well as the Russian share. Finland can therefore not accept the Commission's proposal to increase the TAC for the Main Basin salmon (on the contrary, a substantial reduction is necessary). A reduction is also necessary to take account of weak salmon stocks and the decrease in the number of salmon entering the most important salmon rivers. The increase of the M74 syndrome and the harmful effects of a warmer climate for salmon reproduction also call for precaution.

Furthermore Finland emphasizes the need to effectively eliminate the IUU salmon fisheries that ICES points at in the Baltic Main Basin. The amounts of misreported salmon (reported as sea trout) have increased sharply and the continuation of this activity has to be stopped. This IUU fishing risks the achievement of MSY for Baltic salmon stocks and is in contradiction with the principle of relative stability. Finland expects effective control activities by the Commission, the Member States and EFCA to eliminate any IUU salmon fisheries in the Baltic Sea.

Finland also considers that the Gulf of Finland salmon TAC needs to be reduced more than proposed by the Commission.

#### The cod stocks

Finland expects the TACs for the cod stocks to be set in accordance with ICES advice and the multiannual management plan, which requires the use of the lower F range for the western stock.

#### Cooperation within BALTFISH

Based on these and more detailed positions Finland is together with its partners in BALTFISH working for a common position concerning all the Baltic TACs and other effective management measures.

#### Information on the view of the Åland islands autonomous area

The Åland islands forms an autonomous area in Finland that has competence for fisheries issues. Based on this autonomy Finland hereby informs the Council of the view of the Åland islands.

The Åland islands supports the proposal of the Commission to increase the TAC for salmon in the Main Basin and can support the proposal to reduce the eastern cod TAC with 15 %.

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