



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE/C1/AK/dsb/Ares(2021)

**Subject: Recommendations for fishing opportunities in the Baltic Sea for 2022**

Dear Mr Zieliński,

Thank you for your letter of 29 September 2022 by which you informed Commissioner Sinkevicius and me about the recommendations of the recently established Baltic Sea Working Group of the European Association of Fish Producers Organisations (EAPO) for the fishing opportunities for the Baltic Sea for 2022. Your letter has retained our full attention, and the Commissioner asked me to reply to you on his behalf.

I understand that the membership of your working group and the industry representatives in the Baltic Sea Advisory Council largely overlap. This is also reflected in the fact that the recommendations of your working group are very similar to the ones expressed by the industry in the Baltic Sea Advisory Council and its recommendations. I am therefore also confident that you are aware of my reply to the BSAC on its recommendations, including that the Commission cannot take into consideration recommendations which are not in line with the legislative framework or scientific advice. The Commission's proposal for western Baltic cod was made only in September once the ICES advice was available. In that respect, I would like to inform you that under the rules of the Baltic MAP, the maximum for the total commercial and recreational catches of western Baltic cod is 698 tonnes in 2022. Setting a commercial TAC of 4.461 tonnes as you recommend it would therefore be illegal.

As you certainly know the Council decided on the matter during its meeting of 12 October 2021. The Council decided to set the TAC for commercial catches of western cod in 2022 at 489 tonnes, hence leaving an amount of 209 tonnes for recreational catches. This corresponds to a split of respectively 70% for commercial and 30% for recreational catches as mentioned by ICES. The Council followed the Commission proposal regarding accompanying measures, except for the addition of an exemption from the spawning closure for mussels fisheries in SD 22 and the deletion of the provision on recreational catch-and-release practices.

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As regards main basin salmon the Council followed the Commission proposal for commercial catches. As regards recreational fisheries, the Council broadened the exemption from the prohibition to all types of recreational fisheries.

Regarding the other stocks, the Council followed the Commission proposal except in the following cases. A derogation from the by-catch limitation was introduced for small-scale coastal fisheries fishing with certain passive gears for western herring. The TAC for central herring was reduced by 45% (instead of 54%), sprat was increased by 13% (instead of a roll-over) and plaice by 25% (instead of a roll-over) since BaltFish agreed on a joint recommendation for the mandatory use of more selective flatfish gears in the main distribution area of cod. For the TAC for Gulf of Finland salmon surviving discards were not deducted and the TAC was therefore set at +6% (instead of +4%).

I understand from my collaborators that some stakeholders were disappointed by the initial Commission proposal as they felt that it was too conservative as compared to the ICES advice. Let me explain that the motivation for our proposal was to avoid ending up in similar situations like those of eastern cod and western herring if ever ICES were to find next year that another stock's biomass has slipped below the limit level. We have all seen what can happen in such cases, namely that ICES advises to stop all fishing. This would have a detrimental effect for the fishers and their families and we want to avoid this as much as possible.

I hope that I was able to clarify the matter for you.

Yours sincerely,

Charlina VITCHEVA