



ASSOCIATION OF NATIONAL ORGANISATIONS
OF FISHING ENTERPRISES IN THE EU

EP(15)18

25th February 2015

Europêche comments on the Proposal for a Regulation establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, amending Council Regulation (EC) No 2187/2005 and repealing Council Regulation (EC) No 1098/2007

Background

A management plan for the Baltic Sea cod stocks has been in place since 2007 but the stocks of herring and sprat have not yet been subject to a management plan. This has made it difficult to manage the fisheries in this area and has led to unstable fishing opportunities. Since cod predate on sprat and herring, the size of the cod stocks affects the size of the sprat and herring stocks (and vice-versa). Therefore, this plan has been designed to incorporate the biological interactions of these stocks as well as allowing for the adaptation of fishing mortality and stock patterns when scientific advice improves and environmental conditions change.

General Remarks

Europêche welcomes the proposal from the Commission on the Baltic Sea management plan and are broadly satisfied with the proposed measures. Europêche also supports the removal of the regulation of effort when fishing for cod as well as the elimination of closed areas and seasons in the cod fishery since they are no longer needed. The adaptive nature of the plan regarding exploitation rates and patterns of these stocks in light of improved scientific data is also welcome although the procedure for adjusting such measures quickly is not clear. Europêche recommend that in the absence of scientific advice, an interim target should be chosen at a value close to that of a neighbouring stock. Europeche also believe that the plan should only focus on the stocks concerned; cod, herring and sprat. The plan should also be reviewed more frequently than is proposed to ensure its smooth running. Europêche are of the opinion that the success of the use of delegated acts to make the management adaptive and regional is dependent on a thorough and honest dialogue with stakeholders before the acts are adopted.

Recommendations

Article 1

Point 2 should be deleted or amended since this plan should only focus on the stocks concerned.

Article 2

Definitions of fyke nets and poundnets should be featured in this proposal.

Article 3

1b should be deleted since the management plan does not cover flatfish.

Article 4

The use of ranges would deliver much needed flexibility. It is also important to note that we should wait for the ICES benchmark workshop in March 2015 before setting ranges for all stocks. However, there is no mention of the procedure for which the targets could be aligned with the latest scientific data. Additionally, in the absence of scientific advice (for example, Bothnian Bay herring) an interim target should be set at a value close to that of a neighbouring stock, in this case Baltic Sea herring.

Article 5

Similar to Article 4, we should wait for the ICES benchmark workshop before setting biomass reference points for all stocks.

Article 6

This Article should be deleted or amended to reflect the view that flatfish is not included in this management plan.

Article 7

Poundnets and fyke nets need to be included in this list of gears that are exempt from the landing obligation.

Article 8

It is not clear how the new MCRS for cod (35cm), which is only mentioned in the Discards Plan for the Baltic, will be incorporated into this plan after the repeal of the Delegated Act.

Article 9

Existing technical regulation is far too detailed and it is essential that fishermen have the flexibility to decide their own fishing gear.

Article 12

Europeche do not believe that there is any need for prior notifications in the Baltic fisheries. In particular for vessels less than 12 metres. This should therefore be deleted.

Article 14

More frequent evaluation of the plan is needed to ensure it is working smoothly.
