

European Commission  
DG Maritime Affairs and Fisheries  
Attn: Bernhard Friess  
Rue Joseph II, 99  
B-1000 Brussels

Subject: Multi Annual Plan for the Baltic Sea Trilogue

Brussels, 13<sup>th</sup> May 2015

Dear Mr. Friess,

In the coming weeks, the Latvian EU Presidency, the European Parliament, and representatives of the Directorate-General for Maritime Affairs and Fisheries will hold trilogue negotiations on the proposed multi-annual plan (MAP) for certain stocks in the Baltic Sea and the fisheries exploiting those stocks [2014/0285 (COD)]. As you know, the European Parliament agreed to an amended version of the Commission's proposal for a Baltic MAP that is in line with the Common Fisheries Policy (CFP). At the same time, the Fisheries Council has adopted a partial general approach that seems to contravene the CFP. Specifically:

- **MAP objective.** The Council's partial general approach does not match the objectives of the CFP; specifically, restoring and maintaining fish populations at levels that can produce the maximum sustainable yield (MSY) is a lower ambition than to restore and maintain populations above these levels. This objective was included in the Parliament's version.
- **Application of objective.** The CFP applies the objective to restore and maintain stocks above levels capable of producing the MSY to populations of harvested species without any exemptions. The Council agreement seeks to establish different, lower conservation objectives for relevant flatfish. The Parliament's text matches the CFP objective.
- **Sustainable fishing mortality rates.** The CFP requires MSY exploitation rates to be achieved by 2015 where possible and, on a progressive, incremental basis, at the latest by 2020 for all stocks. The upper bounds of the F ranges in the



Council's partial general approach exceed scientifically advised  $F_{MSY}$  levels. The European Parliament confirmed that MSY mortality rates are an upper limit in line with the CFP and the United Nations Fish Stocks Agreement.

- **Conservation reference points.** The Council's partial general approach calls for remedial measures to be adopted if stocks fall below minimum spawning biomass levels in order to ensure rapid recovery to precautionary levels. This undermines the CFP, which states a commitment to restore and maintain stocks above biomass levels capable of producing the MSY. The European Parliament's version requires that if stocks fall below  $B_{MSY}$  levels that measures are taken to restore and maintain them above these levels.

The MAP for the Baltic is the first of its kind under the reformed CFP. It is therefore of utmost importance that it reflects the objectives set forth in the CFP and provides the necessary tools to achieve them. As guardian of the treaties, the Commission is responsible for ensuring that any agreed to MAP is fully in line with the CFP. I look forward to your response, and in the meantime please do not hesitate to let me know if you have any questions or require any clarifications.

Yours sincerely,

Uta Bellion  
Director, European Marine Programme, The Pew Charitable Trusts

cc: Ernesto Penas Lado  
Ilona Jepsena