

2 April, 2015

**Re. Baltic Sea multiannual plan for cod, herring and sprat**

Dear Fisheries Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR), we send you our recommendations regarding the Commission proposal COM (2014) 614 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks. We ask you to consider our views during your discussions at the upcoming Council meeting.

The proposal by the European Commission needs to be improved to adhere to the objectives of the reformed Common Fisheries Policy (CFP).

You now have a precedent-setting opportunity. The Baltic MAP is the first of several multiannual plans defining the future of fisheries management in EU waters. This plan is a model for future multiannual plans, thus it must be a robust, well-designed and holistic management tool to inform future legislation.

It is your responsibility to ensure that this plan fulfils all objectives and requirements outlined in the CFP. Among these, we call on you to

- Include all mandatory elements for a multiannual plan as outlined in Art 10.1 of the CFP
- Include all objectives of the CFP, in particular wording according to 'above  $B_{MSY}$ ', Good Environmental Status following the MSFD and the ecosystem-based approach to fisheries management
- Agree on sustainable fishing exploitation rates by setting ranges for mortality rates below  $F_{MSY}$  to meet the objectives of the CFP and the UN Fish Stock Agreement
- Include pre-agreed conservation measures that are triggered as soon as stock levels fall below biomass levels capable of producing maximum sustainable yield ( $B_{MSY}$ )

***See Annex for a detailed rationale behind our recommendations.***

Yours sincerely,



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Fisheries Secretariat (FISH)



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