



Mr. Virginijus Sinkevičius  
Commissioner for Environment, Oceans and Fisheries  
European Commission

Brussels, 13 December 2023

Sent by email to: [Virginijus.Sinkevicius@ec.europa.eu](mailto:Virginijus.Sinkevicius@ec.europa.eu)

Subject: **Request for an urgent meeting to discuss the Commission proposal to amend multiannual plans**

Dear Commissioner Sinkevičius,

On behalf of the undersigned NGOs, we would like to express our deep concerns regarding the Commission proposal for a Regulation of the European Parliament and the Council amending the multiannual plans (hereafter, MAPs) in the Baltic Sea, the North Sea and the Western Waters (hereafter, the Commission proposal), published on the 6<sup>th</sup> of December 2023.<sup>1</sup>

The Baltic Sea ecosystem is in severe distress and its major commercial fish stocks have never been in such condition – with several of them collapsed or on the verge of collapse. There is therefore a crucial need for EU decision makers to implement EU law and sustainably manage fisheries in the Baltic Sea, in a way that will effectively support the restoration of those

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<sup>1</sup> Commission Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) 2016/1139, (EU) 2018/973 and (EU) 2019/472 as regards the targets for fixing fishing opportunities, 6/12/2023, COM(2023) 771 final.

fish stocks. Other fish stocks in the North Sea and in the Western Waters are also severely depleted, following consecutive years of overfishing.

Despite this critical undisputed situation, the Commission proposal of 6 December 2023 proposes to delete one of the most important safeguards to prevent fish stocks from collapsing, Article 4(6) of the Baltic and North Sea MAPs, and Article 4(7) of the Western Waters MAP. This safeguard provides that fishing opportunities shall in any event be fixed in such a way as to ensure that there is less than a 5 % probability of the fish stocks falling below the limit level that endangers their ability to replenish (called 'Blim').

This Commission proposal comes shortly after the Council has set the 2024 fishing opportunities for the Baltic in clear breach of this legal safeguard. We are therefore highly concerned by the fact that the Commission is proposing to delete legal safeguards crucial to ensure the long-term sustainability of fish stocks and of the fishing sector in order to accommodate short-term considerations and legalising, *a posteriori*, an unlawful Council Regulation.

More broadly, we are worried about the negative impact this Commission proposal would have on the EU's reputation. Maintaining fish populations within safe biological limits by refraining from fishing below Blim is considered by fisheries managers around the world to be one of the basic elements of sustainable management. This is also a precondition for making MSY possible, as highlighted by the International Council for the Exploration of the Sea, which uses the Blim rule as a basis for its advice on fishing opportunities. Deviating from this fundamental principle would damage the credibility of the EU as a leader in international fisheries and ocean governance, and would also mean a degradation of sustainability standards for the European industry on the seafood market.

We are also deeply concerned by the lack of a proper stakeholder consultation or impact assessment before the publication of this Commission proposal. The call for feedback, which was opened shortly after the Commission proposal has been published, cannot substitute a stakeholder consultation, which has to take place prior to the publication of a legislative initiative, as per the Commission's Better Regulation Guidelines.

We would like to respectfully request a meeting with you, as soon as possible, in order to discuss this proposal and share our concerns about it.

To arrange this meeting, my colleagues will contact your services shortly.

Yours sincerely,

Anais Berthier, Head of EU Affairs, ClientEarth

A handwritten signature in blue ink, appearing to read 'A. Berthier', with a long horizontal flourish underneath.

On behalf of:

**Baltic Waters**

**BirdLife Europe and Central Asia**

**Danmarks Naturfredningsforening / Danish Society for Nature Conservation**

**Deutsche Umwelthilfe**

**Dutch Elasmobranch Society**

**Fisheries Secretariat**

**Oceana**

**Seas At Risk**

**Svenska Naturskyddsföreningen / Swedish Society for Nature Conservation**

**WWF European Policy Office**