

From BSAC Secretariat: Preparing for the Demersal WG 8th March 2022

[updated 28.2.22]

The main focus of this WG is **status on the management of seals in the Baltic**
Also included is **Technical measures in the demersal fishery**

Below is short summary of what the BSAC has done **in relation to seals**

The ecosystem-based management fisheries WG met on 28.3.17

It had a frank and open discussion on seals.

Karl Lundström from the Swedish University of Agricultural Sciences gave a presentation on the impact of cormorants and seals on coastal fish stocks. He presented the population development of these two species in the last 30 years.

Information was given on measures in place in some MS for damage caused to gears

It was highlighted that growing seal populations have a critical effect on small-scale fisheries. There was a proposal from a small-scale representative to recognise the issue, exchange information, promote solutions and agree on actions at a coming meeting

The WG decided that the interaction between seals and fisheries should be addressed by recognising the issue, exchanging information + best practices, identifying solutions and developing alternate gears.

Link to meeting:

<http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Sub-Group-on-Ecosystem-Based-Management>

The ecosystem-based management fisheries WG met on 3.10.17

The aim of the meeting was to move forward to develop a proper BSAC advice or requests, mapped around the Baltic.

Anders Galatius, PhD, Senior scientist, Biologist, Department of Bioscience, Aarhus University, Section for Marine Mammal Research, gave a presentation of the status of seal population in the Baltic Sea.

Peter Ljungberg, PhD, Research assistant, Department of Aquatic resources Institute of coastal research, Swedish University of Agricultural Sciences, gave information on new datasets regarding hidden damage from seal in the Baltic cod fisheries.

There was a clear recognition that the grey seal population is the main problem facing the Baltic. It seems to almost have met the conservation targets all over the Baltic. The seals are protected by EU law, and there are different directives in place. With respect to ecosystem based management some difficult choices have to be made. **The meeting agreed** on the following:

1. A need for continuation of and money in research and science in collaboration with fishers to develop new gears that are seal safe.
2. Compensatory measures alleviate the problem to a limited extent and funding is needed e.g. from the EMFF.
3. Efforts made to improve seal stocks could be suspended in some areas where seals are already abundant. This could be by means of a non-lethal method.
4. Hunting is not the realistic answer, and it is difficult to put this forward as a solution.

Link to meeting:

<http://www.bsac.dk/Meetings/BSAC-meetings/Executive-Committee-and-sub-group-on-ecosystem-bas>

Executive Committee 8.5.2018 and Baltic Seal and Cormorant TNC Project.

A representative from the project gave information on the transnational project on seals and cormorants with 14 FLAGS. The project focused on seals and cormorants and identified the scale of damages in different regions as well as their social and economic impact. The aim was to increase general understanding of the current situation, and to stimulate debate about social sustainability and the role of small-scale fisheries and coastal communities. The BSAC did not agree a date to invite the project representative back [but this will be for the Demersal WG on 8th March 2022].

The meeting report and the presentation of the project are here:

[http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-\(1\)](http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-(1))

Executive Committee 28.6.2018

The meeting discussed other interactions between fisheries and marine ecosystems, in particular **seal fish interactions**. It discussed organising a HELCOM-BALTFISH-BSAC workshop during 2019-2020. ExCom got a report from the HELCOM FISH Group held on 22-23rd May in Warsaw with reference to seal-fishery interactions. HELCOM decided to organize a workshop on seal-fisheries interactions.

The meeting also discussed **a draft opinion concerning the existing EU ban of commercial use of seal products**. After a WTO ruling in the EC, amendments referring to seal products were made to Regulation (EC) 1007/2009 and the Commission adopted a new Commission Implementing Regulation (EU) 2015/1850. The amendments to the EU seal trade ban make it illegal to make commercial use of seals derived from hunts conducted for the sustainable management of marine resources. Seals can be legally hunted in the Baltic Sea, but the catch can only be used in the hunter's own household. A fisheries representative had drafted a letter proposing an amendment to the Regulation (EC) 1007/2009 2018/47 on trade in seal products. **The majority of the BSAC agreed** send a letter to the Commission proposing an amendment to the Regulation (EC) 1007/2009 on trade in seal products. The BSAC letter was sent to DG Mare on 28.6.2018

ExCom meeting report:

[http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-\(2\)/BSACExCom280618ReportFINAL.pdf.aspx?lang=en-GB](http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-(2)/BSACExCom280618ReportFINAL.pdf.aspx?lang=en-GB)

Find letters to COM and BALTFISH and their replies here:

<http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/The-BSAC-proposes-an-amendment-to-the-Regulation->

In its reply, the Commission informed the BSAC that the Regulation (EU) 2015/1775, which amends the Regulation (EC) 1007/2009 on trade in seal products will be evaluated by the end of 2019, based on the reports submitted by the Member States to the Commission by the end of 2018. It also invited the BSAC to transmit the concerns directly to the Member States.

The ecosystem-based management fisheries WG met on 4.9.2018

This WG continued the work from 3.10.17 and discussed the coming Joint HELCOM/BALTFISH workshop on seals. It addressed topics which the BSAC wanted to raise at the meeting. **The meeting agreed** that the workshop should produce an overview of the existing seal-safe gears and present innovations in this field and a complete overview of the compensation schemes around the Baltic. An ecosystem approach is needed to solve the problem between seals and fishermen and finding a balance. What is a Good Environmental Status with respect to an acceptable level of seals? How and in what way will the management of seals take place? Is there sufficient funding for monitoring the seal population?

The BSAC ExCom approved a list of topics to be raised at the Workshop – covering practical solutions/knowledge available, management options, and seal population status and environmental interactions.

http://www.bsac.dk/getattachment/b401139e-4589-4c21-8747-9f4515129e1a/2018_2019_16BSACinputsealworkshopFINALTOGO.pdf.aspx?lang=en-GB

The meeting also discussed a statement regarding illegal seal hunting. This was raised against the background of several cases of illegal killing of seals reported in 2018.

The BSAC ExCom agreed on a statement:

http://www.bsac.dk/getattachment/7c0bffe1-be7b-4f66-ae92-eb13745e529f/2018_2019_17BSACstatementkillingsealsFINALTOGO.pdf.aspx?lang=en-GB

The meeting also took note of the replies to the BSAC letters on trade in seal products.

The HELCOM Workshop on Seal-Fisheries Interactions (SFI WS 1-2019) 27.6.2019

The aim was to build on current knowledge and previous discussions on how to deal with seal-fisheries interactions within HELCOM, BALTFISH, BSAC and to develop proposals for how the issue could be brought forward within the HELCOM context. There was a presentation of the issue and current HELCOM activities; views and presentations from other fora and initiatives on how to deal with issues related to seal-fisheries interactions.

The Workshop recognized that seal populations in general have been increasing in the Baltic Sea, but the situation varies between sub-regions. Abundant data is available, but spatial and temporal distribution at sea is not as well known.

The ecosystem approach needs to be considered, it is not viable to only focus on seals. Seal-fisheries interactions were noted to be a serious issue, although the reasons and solutions were challenging to identify objectively. The possible need to revise HELCOM Recommendation 27-28/2 on conservation of seals in the Baltic Sea was also raised.¹ The Workshop was seen as a useful start to the discussions in addressing seal-fisheries interactions in the Baltic Sea. More work, including involvement of, e.g. the HELCOM Fish Group, State & Conservation, EG MAMA, EN-Noise, the HELCOM-VASAB Working Group on MSP is evident.

The process of updating the BSAP was agreed to provide a good opportunity in ensuring commitment for a way forward in this regard, both on a regional and national level.

The ecosystem-based management fisheries WG met on 22.9.20

The meeting discussed possibilities for improved coexistence of Baltic seals and fisheries. **The WG Chair** noted that the seal conflict with fishing has come to the top of the agenda, and it remains there. He referred to the outputs from the BSAC to the HELCOM/BALTFISH workshop on seals, as well as a proposal to amend the regulation on trade in seal products, and its statement on illegal killing of seals. The BSAC had been informed of measures applied by Member States to regulate seals.

Some fisheries representatives recommended reducing the number of seals, not necessarily by culling. **A representative of small scale fisheries** encouraged Member States to share their experience in mitigating conflicts, including education on how to hunt seals in a proper way. **A representative of anglers** called for an active management of seals within MPAs, created with the goal of protecting fish stocks. **An OIG representative** encouraged the BSAC to look for measures which allow the co-existence of seals and fishermen. **The WG Chair** noted the interest of the fishing industry to mitigate the conflict between seals and fishermen, also by using other measures than culling. He also noted the wish expressed to provide benefits to the ecosystem as a whole, and this involved the need to make choices. No action points were agreed at this meeting.

The HELCOM Baltic Sea Action Plan has been updated ²

We noted the following actions relating to seals:

B19 By 2023 finalise and implement national or local conservation and/or management plans for grey seals.

B20 By 2023 finalise and implement national conservation and/or management plans for ringed seals.

¹ <https://www.helcom.fi/wp-content/uploads/2019/06/Rec-27-28-2.pdf>

² <https://helcom.fi/media/publications/Baltic-Sea-Action-Plan-2021-update.pdf>

B21 by 2025 protect the ringed seal in the Gulf of Finland, including to significantly reduce by-catch and to improve the understanding of the other direct threats on the seals, and urge transboundary co-operation between Estonia, Finland and Russia to support achieving a viable population of ringed seals in the Gulf.

S54 Share information among Contracting Parties, the Baltic Sea Fisheries Forum (BALTFISH) and Baltic Sea Advisory Council (BSAC) on non-lethal mitigation measures or other ways to manage seals-fisheries interactions and implement those measures by 2025, as appropriate.

Issues relating to parasite and affecting health and condition of cod have been dealt with in separate meetings.

For the demersal Working Group 8th March 2022

Please see the draft agenda - updated to 28.2.22

Jane Behrens and Lotte Kindt-Larsen DTU Aqua have **confirmed** participation (pts 4 + 5)
Sven-Gunnar Lunneryd (tbc) and Sara Königson (**confirmed**), Swedish University of Agricultural Sciences to take part (pt 6)

HELCOM seal policy and contact with Member States. The Secretariat contacted Member States and invited them to give updates on seal management measures. Please see short note on this at the end

Riku Mesiniemi and Satu Pakarinen of the Development Association Sepra have **confirmed** they'll take part (pt 9)

<https://www.sepra.fi/in-english>

The aim of Sepra (based in southern Finland) is, by respecting environment and increasing business-like thinking, to create small scale livelihoods and to find new ways of employment and thus secure services and create new ones.

We wrote to Member States on 28th January 2022 and asked them for **a brief update on the measures in force to regulate seals in their respective Member State**, and how measures are working. Below we record the input received.

We also include information presented to the HELCOM Expert Group on Marine Mammals (MAMA) 14-16 September 2021 September 2021. The HELCOM FISH Group was informed of our preparations. We underlined that we want to update the information and not create any extra work.

Denmark

Denmark will give an update at the BSAC meeting. They also refer to a recently started DTU Aqua study on grey seals off Bornholm³, will be finished autumn 2022.

From MAMA:

MPs for grey seal and harbour seal exist. Adopted in 2020 for 2020-2025. Derogation shooting of grey seals and harbour seals. No fixed quota. 48 harbour seals and 2 grey seals in 2020.

Estonia

Has sent additional info on grey seal requirement in addition what is stated in the HELCOM Document (MAMA)

- Management plan for grey seal was adopted in 2014 and is still valid.
- Management plan for ringed seal was adopted in 2015 and is also valid. Ringed seal population is well protected, population size is very small.
- Hunting for grey seal is allowed since 2015. Hunting conditions are revised this year.
- Hunting quota for grey seal- **1%** population:

	quota	Hunted seals no. of sp
2015	53	10
2016	42	10
2017	45	8
2018	37	19
2019	58	20
2020	50	19
2021	55	

- Hunting period 15 April- 31 December;
- Hunting from watercrafts with engine is not allowed;
- Special requirement for weapons and bullets;
- Licenced hunters with training.

The low number of hunted animals could be due to poor hunting conditions. Also, a large area of western part of Estonian waters (Väinameri) is closed for hunting; this is also reviewed this year.

³ <https://www.aqua.dtu.dk/nyheder/nyhed?id={79A874B9-B936-4170-BFFE-0AD20100AE4B}>

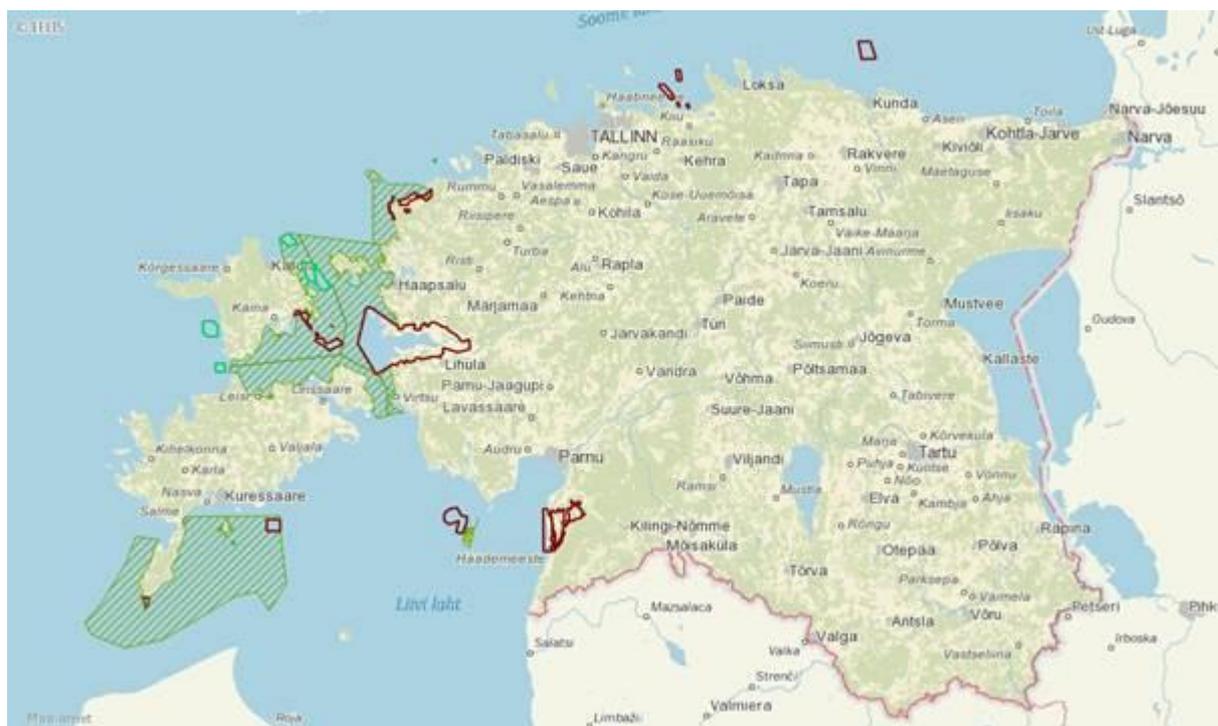


Figure 1. In shaded/striped and otherwise marked areas seal hunting is not allowed.

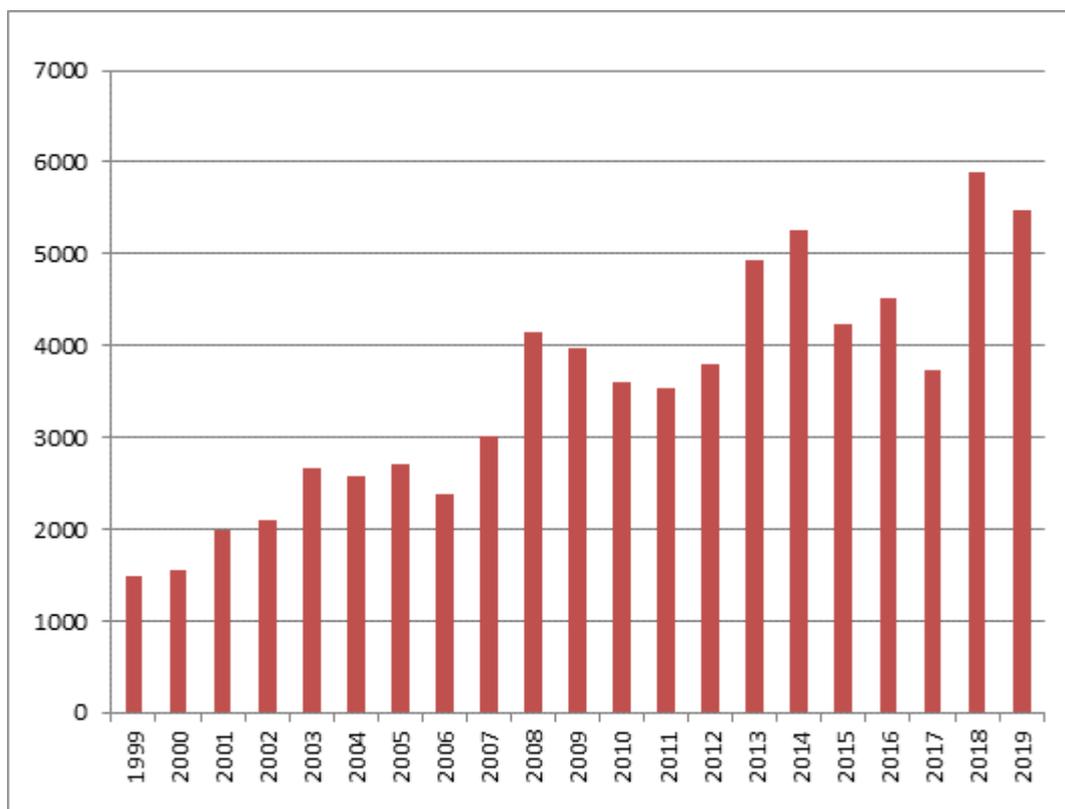


Figure 2. Counted grey seals in Estonia 1999 – 2019. In 2020 5159 sp.

- Population growth over 3 times from 1500 sp in 1999 to 5159 sp in 2020;
- Population is in a good and sustainable level.
- Ecosystem approach is needed, seal impact to other species should be considered as well (e.g cod, salmonids);
- Hunting have had no negative impact to population growth. It could potentially balance negative impact to fish resources and fishing;
- Seal hunting is part of cultural heritage, needs to be respected and revived. It has not only been the part of lifestyle of indigenous people. It has also been part of our ancestors;
- Small scale trade should be allowed:
 - **Avoid treating seal carcass as garbage - waste of resources;**
 - **Compensation of hunting expenses;**
 - **Economical value – local communities handicraft, hunting tourism;**
- The seal trade ban is a real artificial barrier and nuisance, avoiding normal and natural coastal lifestyle!

From MAMA:

MPs for grey and ringed seals were adopted in 2015 for 2015-2019. Planned updates: 2018 ringed seals and 2019 grey seals. The government is revising the management plans on grey and ringed seals after every five years. Numbers of seal by-catch are currently

rough estimates, and the ministry wants to improve and modernise by-catch monitoring. The aim is to make society and other sectors more aware of seals and their environment. The grey seal is in the list of wild game in the Estonian Hunting Act. Hunting started in 2015. Grey seal hunt is included in the management plan. Hunting is only licenced hunting, the quota set annually according to census data.

Finland

Not sent info in advance.

A fisheries sector representative has pointed out that despite the quotas mentioned below, only a tiny part is used because it is not possible to make use of the seal products.

From MAMA:

There are MPs for grey and ringed seal. Adopted 2007 for 2007-2012 and are still valid. The updates of the seal management plans are still in preparation. For hunting period 2021-22 the quotas are as follows:

Grey seal: The quota for the Gulf of Bothnia - Kvarken stock management area is 350 greys seals; quota for the stock management area of Southwest Finland is 400 grey seals; quota for the stock management area of the Gulf of Finland is 300 greys seals

Ringed seal: (Licensed hunting) 1) The Quark-Bothnia Bay 300 individuals. Ringed seal: A maximum of 375 ringed seals in the Gulf of Bothnia stock management area.

In other areas, the quota is 0 rings. Grey seal hunting requires a special licence granted by the Finnish Wildlife Agency, as referred to in section 41 of the Hunting Act;

Grey seal hunt in Åland: The provincial government has decided on the guidelines for the protection hunt for grey seals for the period 15.4.2021-31.1.2022. As in recent years, a personal permit is no longer required to participate in the hunt, but it may be carried out on own initiative. There is still a quota of 500 grey seals that may be killed, for this reason all killed seals must be reported. Of the quota of 500 grey seals, 327 grey seals remain. (last updated on 17.8.2021). Ringed seal: With a hunting licence, granted by the Finnish Wildlife Agency in accordance with the Hunting Act, Sect. 10. Within the regional quota, granted by virtue of the Hunting Act, Sect. 10. Requires a special licence granted by the Finnish Wildlife Agency, as referred to in section 41 of the Hunting Act.

Germany

Will give an update at the BSAC meeting. Has written to inform that:

There are no seal management plans regulating the seal stocks yet.

In the region of Schleswig-Holstein no action has been taken so far in this regard. The region of Mecklenburg-Pomerania has taken some first steps towards a management plan. As grey seal stocks are increasing, fishermen are struggling more and more to cope with the damages caused on passive gear and fykes. In the months with most catches (October-April), in some coastal areas in Mecklenburg-Pomerania this leads to a general reduction of fishing effort in the gillnet fishery. For this reason, the region has established a reporting system for fisheries damages caused by grey seals. Since 2020 the region grants EMFF compensation for the loss of catches.

The region has also established an Advisory Council “Conflict Management Grey Seals and Fisheries”. Members of this AC are the Ministry of Agriculture of Mecklenburg-Pomerania, the relevant nature conservation and fisheries authorities, stakeholders and scientists. The Advisory Council outlined the key points of a possible future seal management plan. It has been decided that the preparation and the implementation of the management plan, which is going to be financed through the EMFAF, should preferably be assigned to an impartial institution. The call for tender is planned for the second half of 2022.

Part of the future discussion on the planned grey seal management plan is also going to be the question whether and the conditions under which a reduction of the stocks would be necessary and legally permitted (we have been informed that in Sweden the reduction of the stocks through hunting is already permitted – we would be interested to know about the details).

From MAMA:

No national MPs foreseen to be produced

A seal-fisheries conflict management plan for Mecklenburg-Pomerania is under development. (see above)

In recent years the first permanent grey seal haul-outs established in the German Baltic Sea, with steadily increasing numbers of grey seals in the Greifswald Bay and Wismar Bay. In 2018 there was the first evidence of breeding on the German coastline as well as moulting. Resting harbour seals are frequently observed in Wismar Bay (Outcome of HELCOM SEAL 4/2010). All hunting of seals is forbidden in Germany.

Some management measures are conducted: All strandings are reported and the cause of death is determined. Reported sightings are also recorded (Outcome of HELCOM SEAL 5/2011). Plans for habitat restoration measures to re-install one important haul-out site that was destroyed by gravel extraction in the early 20th century are not implemented so far due to several reasons. Numbers of seals in this site are monitored twice a month by federal, state authorities as well as scientist and NGOs. (Outcome of HELCOM SEAL 4/2010). Since 2020 several measures are in force in Mecklenburg-Pomerania 1) aerial surveys are conducted during the breeding and moulting season 2) entrances of fish traps in the Greifswald Bay must not be larger than 75 cm in order to avoid grey seal by-catch 3) fishermen may claim compensation for reported seal induced damages (catch or fishing gear).

LATVIA

There has been an existing seal management plan since 18.02.2021 (“Management plan concerning Ringed seal *Phoca hispida*, Grey seal *Halichoerus grypus* and Harbor seal *Pusa vitulina*”). Available online at <https://www.daba.gov.lv/lv/sugu-un-biotopu-aizsardzibas-plani> (in Latvian only). Since none of the seal species bred in the territory of Latvia, the plan only deals with the animals that come into territorial waters to feed. According to the plan, all occurrences of by catch of marine mammals must be reported

and special permits must be procured from the authorities for the disposal of the body of the animal (if it was found dead or too injured to survive).

From MAMA:

One MP for all Baltic Sea species. Adopted in 2021 for 2021-2031. The plan suggests necessary actions in relation to stranded seals and seal by-catch in fishery, as well as technical management options for upgrades and improvements of fishing gear in order to avoid seal depredation. Seals are protected species and hunting are not allowed. The law allows the acquisition of seals as nongame species with special permits.

Lithuania

Not sent info in advance

From MAMA:

There are no management plans and no plans in near future for it to be implemented. Grey seals are protected under Lithuanian law (no categories) and listed as DD (data deficient) under IUCN red list categorisation in Lithuania. No stable seal population. However, resting grey seals can be observed on breakwater rocks near main Klaipeda harbour, other seal species can be observed only very rarely, some of them reported stranded or were taken to rehabilitation at Lithuanian Sea Museum (LSM). In 2019 16 grey seal pups were taken to rehabilitation (LSM), of them were 11 survived. Seals were released in 2019. 3 of released animals were tagged with GPS transmitters in collaboration with Mart Jussi. There is no other monitoring of marine mammals performed.

Stranded individuals: 2018 – 56 grey seals (43 were above 50 kg, 11 weight was not identified, and >50 % were found in June), 2019 – 78 grey seals. No further examination was performed. The majority of dead carcasses were found as usual in May-June.

Baltic sea mammal and bird rehabilitation centre is still under construction and should start working in 2022. In collaboration with interested institutions rehabilitation center should carry out several functions, the main is rehabilitation and monitoring of health status of Baltic seals and marine birds.

Fishermen still receive compensation for their losses due to grey seal activity and in return they have to fill separate sheets about seal sightings in their fishing logbooks.

Pontoon traps were tested on Lithuanian coast this year [2021] during the project lead by Lithuanian Fund for Nature. So far results exceeded expectations – pontoon traps being seal safe, more selective and almost as equally effective as traditional traps.

Poland

Will prepare a short presentation on compensation system and losses in fisheries (mainly sea trout and salmon) caused by seals in Poland and other issues connected to seal management/conservation.

From MAMA:

A MP is under development for grey seal.

Preparation of management plans (in Poland - conservation programmes) for endangered species is one of the main tasks of the General Directorate for Environmental Protection. In

Poland draft national management plans for grey seal and harbour porpoise have been developed within the project “Supporting the restitution and protection of Baltic mammals in Poland” co-financed from the EU funds, conducted by WWF Poland in cooperation with Hel Marine Station of the University of Gdansk and the Foundation for the Development of the University of Gdansk. WWF Poland has hired a professional mediatory company to ensure all stakeholder participation and consultation in the development of draft management plans, including fishermen, national and local authorities, scientists, environmentalists, legal advisers etc. In 2012 there were 2 plenary meetings organized as well as 6 working groups meetings (on the topics of: interactions with fisheries /2 meetings/, disturbance, noise and pollution /2 meetings/, research and monitoring /1 meeting/, information, education and social communication /1 meeting/). There were 98 participants from 42 institutions and organisations involved in this process.

Draft plans were reviewed by foreign scientists and final versions were prepared by the end of the year 2012. At the beginning of 2013 draft management plans were sent to the General Directorate for Environmental Protection which is responsible for further internal and social consultations, preparation of final versions of documents and their adoption as a part of national legislation. During the meeting with the Ministry of Environment and the General Directorate for Environmental Protection WWF Poland received the information that the process of interdepartmental consultations of both documents will begin not earlier than in the first quarter of 2014.

Consultations for the grey seal management plan are planned for 2015.

State Monitoring Programme: grey seal - yearly monitoring during pupping and moulting seasons (since 2016) acc. to HELCOM Guidelines; harbour porpoise: last monitoring (C-PODs) 2016-2018, current monitoring started March 2021 and will last till April 2022.

Sweden

Will give an update at the meeting.

From MAMA:

MPs for grey seal and harbour seal in Skagerrak and Kattegat (except for the “Kalmarsund population”) are in place. Adopted 2012 for 2012- [no end date given]. MP for the Kalmarsund population of harbour seal will be updated and reviewed. MP for ringed seal: A new draft will be reviewed in spring 2017. Grey seal (protective hunting): 760 individuals divided between 12 counties from Norrbotten to Skåne. Ringed seal (protective hunting): 190 individuals divided between the two counties Norrbotten and Västerbotten (The Quark - Bothnia Bay). Harbour Seal (protective hunting): 390 individuals including the counties of Västra Götaland, Halland and Skåne. Development of seal safe fishing gear continues. Information and cooperation as a tool to make better understanding between fishery and conservation is a challenging goal. The long-term (prior to 2040) target for the harbour porpoise action plan is to ensure that the conditions in Swedish waters enable all three populations to reach 80% of their carrying capacity over the next 100 years. For the Baltic Proper population human induced mortality should be zero until favourable conservation status is reached. Management plans for grey seals and harbour seals were adopted in

2012. Conflict with fisheries is an issue. Only protective hunting is allowed on seals in Sweden.

Finally, also for this meeting: Technical measures - update and status on Commission's Implementing Regulation for Technical Measures Regulation (pt 10)

At the Pelagic WG on 24.1.22 the WG Chair recalled that the implementation of technical measures had been raised during the ExCom meeting on 17th January 2022 with request to be dealt as soon as possible, hence it was put on the agenda of the Pelagic Working Group.

A fisheries representative referred to the provisions included in the Implementing Regulation to the Regulation 2019/1241⁴ on technical measures. The draft provisions may lead to several misinterpretations of the existing technical rules. Consultation of the BSAC on the implementing provisions⁵ has not been sufficient and they should be discussed by the BSAC. He underlined the importance of this discussion and the need to set aside adequate time for it. Therefore, he proposed to discuss the matter in the Demersal Working Group meeting on 8th March 2022.

The Working Group decided to discuss the implementation of the Technical Measures Regulation at the meeting of the Demersal Working group, hopefully in the presence of a representative of the European Commission.⁶

The Secretariat has written to the Commission by e mail and reminded about this.

⁴ Regulation (EU) 2019/1241 of the European Parliament and of the Council of 20 June 2019 on the conservation of fisheries resources and the protection of marine ecosystems through technical measures, amending Council Regulations (EC) No 1967/2006, (EC) No 1224/2009 and Regulations (EU) No 1380/2013, (EU) 2016/1139, (EU) 2018/973, (EU) 2019/472 and (EU) 2019/1022 of the European Parliament and of the Council, and repealing Council Regulations (EC) No 894/97, (EC) No 850/98, (EC) No 2549/2000, (EC) No 254/2002, (EC) No 812/2004 and (EC) No 2187/2005

⁵ The Commission's Implementing Regulation is still in the pipeline. Raised most recently by the BSAC in Commission Consultation on the Action Plan: http://www.bsac.dk/getattachment/c88907a6-bfa4-429b-8443-5b699d7f4eeb/BSACreplytoActionPlanConsultation21_22_30.pdf.aspx?lang=en-GB

⁶ The BSAC Secretariat wrote 25.1.22 to the Commission representative to recall the work on technical measures, and questions raised by the BSAC at earlier meetings.