

**Baltic Sea Advisory Council (BSAC) position for the European Parliament
PECH Committee Hearing :**

***“State of play of the implementation of the Multiannual Plan (MAP) for the
Baltic Sea” ****

23rd January 2023

- The Baltic Sea Advisory Council (BSAC)** consists of organisations representing the fisheries and other interest groups affected by the CFP (e.g., environmental, organisations, and sports and recreational fisheries organizations).
- The main aim of the BSAC is to prepare and provide, recommendations on the management of Baltic Sea fisheries to the policy makers and managers - in order to achieve a successful implementation of the EU’s Common Fisheries Policy CFP).
- The position presented today is based on the BSAC official positions, including a reply to the Commission’s questionnaire on MAP, submitted during the first assessment in year 2019, and the BSAC White Paper published in year 2022

- **The Baltic Sea MAP was the first to be adopted and became a blueprint for future MAPs.**
- BSAC recognised that, in year 2019, 3 years after implementation of the MAP for Baltic, it was perhaps too early to draw final conclusions on the effectiveness of the MAP.

On the basis of these, the BSAC wishes to highlight the following:

1. Overall assessment

The BSAC appreciated the overall objective of creating a regional management plan and the attempt to introduce a multi-species management. However, the BSAC members were not satisfied with the general performance of the MAP.

The MAP had not lived up to its expectations during the first 3 years of its implementation. In the opinion of the BSAC, the MAP should be revised in order for it to be more adaptive in the following years.

New knowledge should be assessed with a view to allow for more adaptability in the Baltic MAP.

In 2019, the BSAC considered that the MAP had not facilitated the process of setting of TACs for the relevant stocks. Several BSAC members were of the opinion that the MAP had been counterproductive in this process.

The MAP has not contributed to increasing the number of TACs set at MSY and has not helped in dealing with difficult cases such as the eastern and western Baltic cod stocks, and western herring.

2. Other shortcomings

The BSAC considers that the MAP has other shortcomings, such as:

- The lack of defined measures to be applied in emergency situations and, that the regional component, that is key to the successful functioning of a MAP, has not been delivered. This is a disappointment.
- In the specific case of the Baltic western spring spawning herring, a migratory stock present and exploited not only in the Baltic, but also in Skagerrak-Kattegat, and in the North Sea, the BSAC agrees that, in the short term, the Multiannual Plan for the Baltic Sea should act as a rebuilding plan and that it can be the guiding tool for the management of this stock.

However, the EU Baltic Sea MAP applies only to herring managed exclusively by the EU in the Baltic Sea (ICES subdivisions 22–24)..

The BSAC indicates that the Commission should therefore request ICES to put the EU MAP advice as its headline advice.

In the midterm, the BSAC recommends that a specific rebuilding plan be prepared and discussed with the third countries.

- The MAP has actually been counterproductive in implementing an ecosystem-based approach to fisheries, whereby environmental factors and interactions are to become a more integral part of managing the fisheries.

Moreover, the MAP does not take into consideration the importance of species interactions.

Despite having a clear objective for this in Article 3.3., the MAP does not contain any provisions for allowing for real implementation of ecosystem-based management for achieving good environmental status (GES).

Stating an objective is insufficient and unnecessary if it is not followed through. The MAP should provide concrete provisions to take this into account.

3. Points highlighted in addition by some BSAC members

- In the opinion of the Other Interest Group (OIG), the MAP had been harmful to the management of Baltic Sea fish stocks and its implementation has been detrimental.

In their view, for only one of the seven stocks managed by the MAP has the Plan been correctly implemented (Gulf of Riga herring).

The unsuccessful implementation of the MAP and the omission to follow the clear guidelines laid out in the MAP had a detrimental effect on the other stocks.

The OIG underlined that the MAP is not facilitating the implementation of the CFP and the Marine Strategy Framework Directive as intended.

- In the view of fisheries stakeholders, the lack of socio-economic considerations is one of the main shortcomings of the MAP.

In their view the MAP should manage fisheries, whilst at the same time take into account the fishermen and the impact and consequences of management decisions on them.

So, the scope and perspective of the MAP should be widened to include the socio-economic clause.

- The fisheries stakeholders also underlined that the framework provided by the MAP is not flexible enough to respond to the fluctuations caused by nature and changes in the ecosystem.

In concrete terms, the ranges of target fishing mortality levels set out in Annex I 1 to the Plan are too rigid in the light of inconsistent scientific advice on fish stocks and do not allow for a more adaptive management.

4. Other additional remark

- The BSAC would like to draw the attention that the STECF Annual Economic Report on the EU fishing fleet indicates that small scale fishery in the Baltic presents a continuously deteriorating picture. In some parts of the Baltic small scale sector is at the verge of collapse.

Background / context:

*The first ever EU multiannual plan (MAP) for cod, herring and sprat fisheries in the Baltic Sea¹ entered into force in July 2016. The aim was to create better conditions for complying to the Common Fisheries Policy and the objectives of environmentally, economically and socially sustainable fisheries and aquaculture.

** The BSAC was initially set up in March 2006 as part of one of the pillars of the 2002 reform of the Common Fisheries Policy to involve stakeholders in the fisheries sector in the way fisheries is managed in the EU. This role has been confirmed by the 2013 EU Regulation on the Common Fisheries Policy.

*** The BSAC-position, presented in this non paper, is based on the replies to the Commission's 2019 consultation on the assessment of the MAP's performance in meeting its objectives and identifying any weaknesses in design or implementation that undermine its effectiveness.²

Relevant statements from the BSAC White Paper on the Common Fisheries Policy, published in 2022, and the latest letter exchanges with the Commission on western Baltic herring³ have also been used to prepare this document⁴.

In September 2020, the European Commission presented the first evaluation⁵ of the first four years with the MAP.

¹ Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 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; <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32016R1139>

² The BSAC discussed the questions at its meeting of the Joint Working Group held on 11th – 12th June 2019.

³<http://www.bsac.dk/getattachment/c8622593-8756-42ea-971c-b418124eff62/PelagicWGlettertoCOMWBHerring2022-2023-27.pdf.aspx?lang=en-GB>

⁴ BSAC White Paper on CFP 2022: <http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-white-paper-on-CFP/White-paper-02-05-2022forprintandweb.pdf.aspx?lang=en-GB>

⁵ REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL First report on the implementation of the Multiannual Plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks, 2020 [EUR-Lex - 52020DC0494 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eur-lex-content/EN/COM/COM(2020)0494/F1/F1_EN_COM(2020)0494.pdf)