

BSAC Demersal Working Group
Friday 17th March 2023
9.00 – 13.00 (CET) by Zoom
REPORT

1. Welcome by the Demersal WG Chair Teija Aho

Teija Aho, the Demersal WG Chair welcomed all the BSAC members, the European Commission, ICES, Member States and all other observers.

2. Formalities for the start of the meeting

Apologies and adoption of the agenda. The meeting was recorded for reporting purposes. The agenda was adopted.

3. Cod closures exemption

The WG Chair recalled that the proposed amendment to the derogation on closures to protect cod spawning¹, referring to the prohibition to fish with any type of fishing gear in subdivisions 25 and 26 from 1 May to 31 August and in Subdivision 24 from 15 May to 15 August, which is part of the Council Regulation (EU) 2021/1888, was tabled during the last WG meeting in October 2022 by one BSAC member². The proposed amendment refers to the depth at which vessels fishing flatfish with gillnets can fish (from 20 metres to 30 metres). The BSAC Secretariat had prepared a draft recommendation. After receiving comments to the draft from BSAC members, the WG Chair decided that it would not be possible to reach a consensus on the recommendation in a limited time before the BALTFISH meeting preceding the Council meeting. A question on the possible impact of the proposed increase in the depth at which the exemption is applied from 30 m to 40 m was submitted to ICES during the MIAC meeting³.

¹ Council Regulation (EU) 2021/1888 of 27 October 2021 fixing for 2022 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea and amending Regulation (EU) 2021/92 as regards certain fishing opportunities in other waters, Article 7.2.b and 7.4 b. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R1888>

² [http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Demersal-Working-Group-\(1\)/BSACDemersalWG05102022reportfinal.pdf.aspx?lang=en-GB](http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Demersal-Working-Group-(1)/BSACDemersalWG05102022reportfinal.pdf.aspx?lang=en-GB)

³ **BSAC question at MIAC:** *Passive gear fishermen have an exemption for fishing flatfish up to depths of 20 meters. Some fishers representatives observe an increase in sea temperatures meaning that plaice and flounder are found in deeper water where it is colder. This raises questions on an increased depth of cod spawning. Does ICES have any more recent evidence regarding cod spawning in SD 25 and 26 at depths greater than 20 meters? Are any investigations of the impact of extending this exemption to depths of 30 and/or 40 meters foreseen?* Answer from ICES: <http://www.bsac.dk/getattachment/BSAC-Resources/Documents-section/BSAC-Newsletter-latest/MIAC-2023-BSAC-questions-4-4,-4-11-ICES-responses.pdf.aspx?lang=en-GB>

Mark Dickey Collas, Chair of ICES ACOM referred to the comments already shared by ICES in its reply to the question asked by the BSAC at MIAC⁴. From the late 1980s, the mean depth of both adult cod and flounder distributions has decreased, while that of juvenile cod has increased, and that the depth ranges used by cod and flounder have contracted. This has probably taken place due to a combination of hypoxia in deep waters and increase in predation risk in shallow waters. The net effect of these changes is that adult cod, juvenile cod and flounder overlap more, which may increase the intra-and interspecific interactions. Thus, the evidence suggests that changes in the depth distribution of flatfish (but also cod) have probably taken place by other factors than temperature change, such as salinity. Cod is unlikely to spawn at depths 30-40 metres because the salinity is low and thus the reproduction success rate is also very low. However, expanding the depth limit for flatfish fisheries using passive gear from 20 m to 30-40m will likely have other consequences for cod. The area expansion may include feeding grounds for pre- and post-spawning cod. Hence, there is an increased risk for cod bycatch, including increased risk for catching cod during their spawning migrations.

A fisheries representative from Poland asked whether ICES had identified any new spawning grounds apart from the Bornholm Deep, Gdańsk Deep and Gotland Deep, where additional protection measures would be needed.

The representative of ICES ACOM replied that ICES does not dispose of any new information on any new cod spawning grounds. He was not able to give more information related to the question submitted by the BSAC on cod spawning depths and the impact of the exemption apart from the answer provided by ICES at MIAC meeting in January 2023.

A fisheries representative from Denmark pointed out that cod bycatch is regulated by a bycatch TAC and therefore an increased risk of bycatch at certain depths does not really impact the stock development.

Another fisheries representative from Poland asked whether ICES disposes of data on bycatch of cod in passive and active gears.

The representative of ICES replied that ICES does not dispose of specific data on bycatch of cod for active and passive gears at 20 and 30 m depths. He pointed to the lack of expertise in mixed fisheries, as well as gear oriented experts in the Baltic and the need to consider this problem.

The representative of an organisation representing small scale fishers expressed his dissatisfaction with the fact that ICES is not in a position to give a clear opinion on the impact of expanding the depth limit for flatfish fisheries using passive gear from 20 m to 30-40m. He underlined that the same Regulation allows vessels targeting pelagic stocks with active gears in the same areas to fish at 50 m depth⁵. In his view, there is an urgent need

⁴ http://www.bsac.dk/getattachment/BSAC-Resources/Documents-section/BSAC-Newsletter-latest/MIAC-2023-BSAC-questions-4-4,-4-11_ICES-responses.pdf.aspx?lang=en-GB

⁵ Council Regulation (EU) 2021/1888 of 27 October 2021 fixing for 2022 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in the Baltic Sea and amending Regulation (EU) 2021/92 as regards certain fishing opportunities in other waters, Article 7.2.b and 7.4 b. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R1888> and Council Regulation 2022/2090, Article 7.2.b and 7.4 b [Publications Office \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32022R2090)

to amend the derogation on closures to allow small scale fishers to fish with gillnets in waters below 20 m, to target flatfish which are found in colder water, at lower depths.

A representative of the OIG stated that he could not accept any amendments to the derogation because of too many uncertainties related to the impact of fishing in waters deeper than 20 m on cod, especially in the vicinity of cod spawning areas. He pointed to the need to have scientific research on whether, taking into account the increasing water temperature in the Baltic, cod and spawning move to deeper waters.

A fisheries representative from Denmark agreed that there are arguments for lifting the restrictions imposed by the legislation due to the observed changes in environmental conditions. The proposed amendment to the derogation will allow small vessels equipped with gillnets to fish at water depth up to 30 metres and thus to make full use of the existing resources of flatfish. In his view, the rules are too restrictive for small scale vessels which have no possibility to move to other fishing grounds. He underlined that any closures and restrictions on the fisheries should only be imposed around the spawning grounds, including a safety margin, and should not cover the entire sub-division, as it is the case at present.

A fisheries representative from Sweden underlined that there is an urgent need to conduct a thorough evaluation of the effectiveness of all the measures to protect cod spawning areas. She pointed out that some spawning closures have not been shown to have any measurable positive impact on stock development and at the same time, they have a major effect on the fishing and fish processing sectors.

The representative of an organisation representing small scale fishers stated that it is important to ensure that there is a level playing field in the application of the rules.

Some fisheries representatives underlined the need to precisely define cod spawning grounds. In their view, any measures applied to fisheries should be based on sound scientific research and evaluation. They pointed out that any management decisions have a substantial impact on the viability of the fisheries sector.

A representative of small scale fishers from Germany stated that the proposed amendment to the derogation should be implemented without delay to allow small vessels to make use of the existing resources of flatfish.

The Working Group agreed on the need to evaluate all the measures implemented to protect cod spawning areas. In particular, the depth for the derogations and by-catch levels for each specific fishery should be considered.

The Working Group agreed that a level playing field should be implemented across the different Baltic sub-divisions and exemptions from any protection measures should be granted in a fair way.

The Working Group agreed that the lack of adequate scientific data and expertise should be addressed by the Member States and respective national scientific institutes.

The Working Group decided to ask the BSAC Secretariat to draft a letter addressed to the Commission, referring to the derogation on closures to protect cod spawning (Council Regulation 2022/2090, Articles 7.2.b and 7.4.b) and to ask, among others for an evaluation

of the measures implemented to protect cod spawning areas and a level-playing field in the application of the rules.

4. Drafting of BSAC recommendation on the conclusion of the STECF AER report⁶

The WG Chair referred to the comments received from DG Mare after the ExCom in January 2023, regarding the STECF AER report⁷:

The 2023 AER will continue efforts made in previous years to streamline the contents while providing more in-depth look at the different factors driving the economic performance of the EU fleets. The report will provide an in-depth look at the different factors affecting the economic performance of the EU fishing fleet with a special focus on the major drivers and issues affecting the sector (in particular, the impacts of the high prices for fuel, energy transition of the fleet and conservation measures). Special focus should be given to the energy transition of the EU fleets and economic benefits of MSY. In particular it will produce a break-even revenue analysis in relation to fuel prices for the main fleet segments of the EU fishing fleet.

The Executive Secretary referred to the draft BSAC recommendation on the conclusions of the STECF AER distributed by the BSAC Secretariat to the members before the meeting. He reminded the participants that the ExCom in January 2023 agreed that the BSAC should address a recommendation on the STECF AER to the European Commission and Members States. It was agreed to continue the discussions of the AER in the framework of the Demersal WG. He informed that no written comments had been received to the draft recommendation.

The Working Group decided to ask the Secretariat to circulate the draft recommendation on the conclusions of the AER to the Working Group participants for comments. **The Working Group** decided that the final draft will be send to the ExCom for validation and then submitted to DG Mare in due time before the STECF meeting on 24th April 2023.

5. Preparatory work on BALTFISH - BSAC workshop on predators

The WG Chair referred to the draft preparatory document for the workshop on predators prepared by the Secretariat and consulted with the Management Team. She informed that the Management Team will discuss the date of the workshop and other practicalities with the Lithuanian BALTFISH Presidency during the virtual coffee meeting on 28th March 2023. The WG Chair invited the participants to provide comments on the specific topics to be discussed during the workshop, expected outcome and possible experts to be invited.

A fisheries representative recalled that discussion on seals had been going on for a long time in BSAC meetings. In his view, it should be acknowledged that the abundance of parasites in cod is closely related to the growing population of seals and that the proper management of the seal population could probably help to improve the condition of Baltic cod. Refriring to the statement made by the European Commission that the public opinion on seal management should be changed in order to introduce a management system, he underlined that the national administrations as well as the European Commission are

⁶ [http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-\(9\)/7-AER-2022-to-BSAC-\(1\).pdf.aspx?lang=en-GB](http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-(9)/7-AER-2022-to-BSAC-(1).pdf.aspx?lang=en-GB)

⁷ [INSTRUCCIONES \(bsac.dk\)](http://www.bsac.dk/INSTRUCCIONES)

responsible for the management of seals and the issue cannot be solved solely according to public wish.

A fisheries representative from Finland referred to the report on the mitigation of seal-fishery conflict prepared by the Natural Resources Institute in Finland (LUKE)⁸, which supports the development of a seal management plan covering the Baltic. Such management plan had been ordered by the Finnish Ministry of Agriculture and Forestry and will be prepared by the Finnish Wildlife Agency⁹. She also referred to the EU ban on trade in seal products and expressed hope that the ban could be lifted in the near future as it hampers the management of seals. She proposed to invite the European Commission to the workshop. She also referred to the BALTFISH symposium on seal – fish/fisheries interaction in the Baltic Sea, held in Gothenburg on 19-20 March 2019¹⁰ and proposed to invite some of the experts who took part in the symposium to make presentations at the workshop.

The representative of DG Mare underlined that with respect to seal management, the Member States can follow the provisions of the Habitats Directive. He proposed to invite the representatives of DG ENV which is responsible for the EU policies on the environment. With reference to the trade in seal products, he pointed out that any change to the Regulation¹¹ would need to be agreed between the Council and the European Parliament, which seemed unlikely unless the public opinion is in favour to amend these rules.

A representative of the OIG referred to the discussions on seals undertaken by the BSAC at several occasions. He underlined that many issues had been already addressed and the workshop should bring in some concrete solutions. In his view, the issue of both seals and cormorants should be addressed in the context of the ecosystem needs. More clarity is needed on the understanding of good environmental status (GES) and the carrying capacity level of the of seal and cormorant populations. He recalled that in the past the BSAC had agreed that one of the non-lethal methods to manage seal populations could be to suspend the efforts made to improve seal stocks in some areas where seals are already abundant. In his view, the interaction between seals and fisheries should be addressed by exchanging best practices and identifying solutions other than culling, such as seal-proof gears. HELCOM Recommendations referring to the carrying capacity of seal populations should be amended to match the current situation. The BSAC should invite experts from Canada and the US to share their experience in managing seal-fisheries conflict.

A representative of small scale fishers from Germany referred to the urgency to manage seals and cormorants in view of their impact on fish stocks. The task is

⁸ Mitigation of seal conservation and fisheries requires cooperation in the Baltic Sea region <https://www.luke.fi/en/news/mitigation-of-seal-conservation-and-fisheries-requires-cooperation-in-the-baltic-sea-region> by the National Resource Institute of Finland.

⁹ The plan was supposed to be ready already 2018-19, but is very much delayed. The plan will be written by The Finnish Wildlife Agency <https://riista.fi/en/>.

¹⁰ [190506-Minutes-for-participants-from-BALTFISH-symposium-on-Interaction-seal-fish-fisheries-19-20-March-2019-\(FINAL-PDFr\).pdf.aspx \(bsac.dk\)](#)

¹¹ Regulation (EC) 1007/2009 on trade in seal products, as amended by Regulation (EU) 2015/1775 [Regulation \(EC\) No 1007/2009 of the European Parliament and of the Council of 16 September 2009 on trade in seal products \(europa.eu\)](#)

challenging, but the decision-makers should acknowledge that the fish stocks in the Baltic will not improve without proper management of seals and cormorants. He also pointed out that not only the Baltic cod suffers from bad condition. He called for conducting scientific research to find the reason for the decreasing size of flatfish as it is not possible to sell the fish on the market.

A representative of anglers underlined that concrete steps to manage the populations of seals and cormorants in the Baltic are urgently needed, in order to rebuild the fish stocks. He referred to the opinion of a Swedish scientist who had proposed to manage the seal population in the same way as the moose population. To this end, the carrying capacity of the ecosystem needs to be calculated for both seals and cormorants, along with the population size and growth rate. He emphasized that the BSAC should recommend management measures, by majority decision, if consensus cannot be reached among the members.

A fisheries representative from Finland stated that the workshop should also discuss the economic consequences of seal and cormorants predation on fisheries, taking into account the costs of management measures (seal deterrent devices, such as pingers) and as well as economic losses caused by seals and cormorants to fisheries. She underlined that in Finland a lot of money had been invested in restoring the rivers, to preserve salmon and sea trout stocks, and the economic consequences have to be considered.

A fisheries representative from Poland agreed that a limit reference level should be set for seal populations in the Baltic. He underlined that, according to the information given by a scientist from Finland¹², the objective set by HELCOM as limit reference level for seals in the Baltic had been exceeded long time ago.

A representative of recreational fishers underlined that the objective of the workshop should not be to discuss whether to manage seals and cormorants, but how to do it.

A fisheries representative from Estonia stated that management measures are needed, otherwise there will be collapse of coastal fisheries. Estonia has introduced a hunting quota, mainly to remove problematic male seals.

A representative of the OIG stated that high costs of culling programmes and food web dynamics, which is of high relevance in the context of ecosystem based management, should also be discussed during the workshop.

The representative of an organisation representing small scale fishers proposed to base the content of the workshop on previous discussions on predators held in the BSAC. He drew the attention to the fact that cod is also a predator and therefore should be considered during the workshop.

A representative of small scale fishers from Sweden pointed to the fact that growing seal populations are the main cause of natural mortality of cod due to liver worm infections and predation. Therefore, he underlined that there is an urgent need to reduce the seal populations in the Baltic to give a chance to the cod stocks to recover.

¹² **Petri Suuronen from Natural Resources Institute Finland (LUKE)** presented the RESOCO project during the Demersal WG meeting on 5th October 2022 [BSAC - BSAC Demersal Working Group](#)

The Working Group decided to ask the BSAC members to submit more comments / proposals on the workshop on predators after the meeting. A BSAC proposal, based on the input from the meeting and written input received after the meeting will be discussed with BALTFISH Presidency on the 28th March 2023.

6. Information and updates on the Commission's Delegated Act for the flatfish gear and on the implementing act to the Technical Measures Regulation

A representative of DG Mare presented an update on the Commission's Delegated Act for the flatfish gear and on the related Implementing Act to the Technical Measures Regulation during the discussion of **item 7**.

7. DRAFT proposal from DFPO for a letter from BSAC on the introduction of new mandatory trawl gear devices

The WG Chair referred to the draft proposal from the Danish Fishers Producers Organisation (DFPO) for a BSAC letter on the introduction of new mandatory trawl gear devices. The draft letter draws attention to the problems imposed by the upcoming implementation of the new selective gears. She asked the WG to discuss whether the BSAC should sign this letter.

The representative of an organisation representing small scale fishers asked for clarification on the process that had led to this agenda item.

The Executive Secretary explained that the letter had been received in early February but that there had been a lack of clarity on the process to follow. The Management Team met and discussed this issue on the 03/03¹³. It decided to send the letter to the Working Group allowing for a more inclusive process. This was done on the 8th March, before the Working Group meeting, following a consultation with the author of the letter. Comments from two members of the ExCom were received¹⁴.

The ExCom Chair drew attention to the fact that according to the Rules of Procedure in force, the fast track procedure can only be used by the BSAC if a rapid consultation of the BSAC is required by the European Commission, BALTFISH or another body of similar standing. He underlined that the need to use the fast track procedure at other occasions will be considered during the ongoing revision of the BSAC Rules of Procedure.

A fisheries representative from Poland referred the comments raised with regard to the operability of the proposed gear modifications during previous discussions in the BSAC on the new gear devices. He agreed that some vessels may be too small to add on the gear extensions. He underlined that the trials conducted in Poland with an amended construction of the trawl and a 120 mm mesh size had proved to significantly reduce the bycatch of cod in flatfish fishery. Given these results, in his view, there is no need to

¹³ During the meeting of the Management Team, **some MT members** drew attention to the possibility to use the fast-track procedure for consulting the ExCom on this matter. One MT member was of the opinion that fast-track procedure would be in this case inappropriate to get sufficient input to the letter from the OIG members, given the fact that they are not experts on fishing gear specifications, need more time to provide their opinion on such technical matter, and might have significant comments on the letter. The MT therefore agreed to send this letter to the WG, preferring a more inclusive process.

¹⁴ European Anglers Alliance and Coalition Clean Baltic.

increase the mesh size to 125 mm. In his view, trials with the new devices should be continued before they are implemented as compulsory gears.

The fisheries representative from Denmark explained that the DFPO letter was submitted to the BSAC Secretariat with a request for an urgent procedure due to the fact that the internal consultations of the new trawl devices in the Commission are now being finalised. The letter is addressed to the Commissioner and draws attention to several technical issues related to the implementation of the new gear, especially for small vessels, as well as overly specific description leaving no room for necessary adaptations. The letter asks to postpone the implementation of the new trawl devices by at least one year, in order to collect more experience on how to operate and adapt the gears in various areas and for various vessels before its implementation. He expressed hope that the letter can be endorsed by the BSAC.

A representative of anglers referred to the comments submitted to the letter before the WG meeting. He underlined that European Anglers Alliance had no objections to the substance of the letter, however in his view gear experts should confirm the technical issues raised in the letter.

A fisheries representative from Poland stated that as a gear expert and producer he can confirm all technical problems anticipated with the introduction of the new gear in the letter drafted by DFPO. He referred to his presentation¹⁵ given at the ExCom in June 2022 where similar technical issues had been raised with respect to the proposed devices.

The representative of an organisation representing small scale fishers referred to the need to introduce new, more selective gears to minimise the bycatch of cod. He underlined that the use of the currently allowed gears is not an option, as cod stocks will not improve unless new gears are introduced. He referred to the ICES advice in 2022 and improved recruitment of the western cod and emphasized the need to use more selective gears to give a chance for the stock to improve.

A representative of the OIG underlined that considering the present situation in the Baltic fisheries and the fact that the gears which had been made compulsory in the past had proved ineffective, new gears should be introduced as soon as possible, on the condition that they are operational. In his view, the BSAC should raise the problems related to the operationality of the proposed gear modifications to the Commission.

A representative of DG MARE reiterated that the gears will be introduced in Annex VIII of Regulation 2019/1241 on technical measures¹⁶ with a Delegated Act, and the technical specifications will be detailed in an Implementing Act, in accordance with Article 24. The transposition into law of the BALTFISH JR requires a Delegated Act (for the principles of the gears and devices) and an Implementing Act (for the related technical details). The European Commission had consulted the STECF on technical matters related to the new

¹⁵ [\[Modtagerfelt\] \(bsac.dk\)](https://www.bsac.dk/Modtagerfelt)

¹⁶ Council Regulation 2019/1241 Article 24 on Implementing Acts [Regulation \(EU\) 2019/ 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 \(europa.eu\)](#)

gear. The Delegated Act already passed the 4-month scrutiny with Council and the EP and none of the two institutions objected, hence the Commission is allowed to adopt the Delegated Act. The Delegated Act corresponds to the content of the joint recommendation on which BSAC was consulted by BALTFISH and which was assessed by the STECF. The Commission will however will withhold the publication of the DA in the Official Journal until the Implementing Act is ready so as to adopt both acts at the same time. The Implementing Act is still being prepared internally. Its current content differs from the joint recommendation as some Member States asked for some technical modifications. The STECF positively assessed the new technical annex suggested by the Member States in its plenary of November 2022 (PLEN 22-03)¹⁷. The Commission recalled that, following the process of regionalisation, it can only accept or reject joint recommendations as a whole, but not amended them. Once the Commission has a final version of the implementing act, and after having consulted the other Commission services, the stakeholders, including the BSAC will be consulted for 4 weeks via the “have your say” website¹⁸. The Commission may consider, following the public consultation, requesting a third assessment to the STECF.

A fisheries representative from Poland expressed disappointment and frustration that the BSAC had not been consulted on the Delegated and Implementing Acts despite the fact that the BSAC had at several occasions requested proper consultation on the implementing rules for new gears. He underlined that fishers who use the gear should be consulted at an early stage of drafting the legislative acts to avoid any misinterpretations, which could have serious consequences. He shared the opinion expressed by DFPO in the letter that the new devices should not become the only compulsory gears in flatfish fishery.

A representative of DG Mare explained that the BSAC was consulted on the draft BALTFISH Joint Recommendation (JR) in September 2021 and during the BALTFISH – BSAC technical meeting organised in October 2021. At the time, the BSAC only raised concerns about the compulsory nature of the measures. Stakeholders will be consulted on the Implementing Act once the final draft has been through the internal Commission’s procedure. She also informed that the new technical Annex contains provisions as regards the adaptation of the gears to smaller vessels. **Another representative of DG Mare** stated that the Commission had taken due note of all the issues raised by the BSAC in the past, related to the implementation of the new devices and the existing technical measures, among others, comments made during the consultation of modified T90 and BACOMA codends, proposed by the Swedish BALTFISH Presidency. He referred to the fact that during the consultation of the BALTFISH Joint Recommendation on technical measures for Baltic demersal trawl fishery in 2021, the BSAC had been made aware that the political intention of the BALTFISH Joint Recommendation is to minimise bycatch of cod and that the existing gears should be phased out.

¹⁷ https://stecf.jrc.ec.europa.eu/reports/plenary/-/asset_publisher/oS6k/document/id/53131443?inheritRedirect=false&redirect=https%3A%2F%2Fstecf.jrc.ec.europa.eu%2Freports%2Fplenary%3Fp_p_id%3D101_INSTANCE_oS6k%26p_p_lifecycle%3D0%26p_p_state%3Dnormal%26p_p_mode%3Dview%26p_p_col_id%3Dcolumn-2%26p_p_col_pos%3D1%26p_p_col_count%3D2

¹⁸ Published initiatives (europa.eu)

The representative of an organisation representing small scale fishers expressed the view that wasteful fishery with high discards and unaccounted fishing mortality have a negative impact on the fishing opportunities and result in lower TACs for cod and plaice. In his view, if the new gear is not implemented, extra unnecessary mortality will result in lower TACs.

A representative of DG Mare commented that the 2023 TAC for plaice had been increased based on the assumption that the new gear devices will be implemented. The TAC for plaice for 2024 should not be impacted if the Delegated Act is adopted this year.

The Working Group agreed that any new gear should be fully operational on all vessels. **The Working Group decided** that technical issues related to the operability of the gear have to be considered by the Commission before the gear becomes mandatory.

The Working Group took note that some BSAC members had highlighted the need to move away from the current gear and to implement a new mandatory gear as soon as possible.

The Working Group did not reach agreement on the draft letter proposed by the DFPO.

The Working Group decided to ask the BSAC Secretariat to compile all comments received from members during and after the meeting and to draft a recommendation. The recommendation will be finalised after the publication of the final text of the Implementing Act, as a reply to the public consultation, which, according to the information provided by the representative of DG Mare will take place in spring 2023.

8. AOB

There was no AOB.

The WG Chair thanked all participants for good discussions.