

Ieva Žundienė
Department of Fisheries
Ministry of Agriculture
Gedimino Ave. 19
LT-01103, Vilnius
Lithuania

By e mail to: ieva.zundiene@mfa.lt
cc: Jolanta.Cesiuliene@zum.lt ; Ana.Sedenko@zum.lt

BSAC 2022-2023/37

Copenhagen, Wednesday 22nd February 2023

Subject: BSAC comments on the additional document from the Natural Resources Institute Finland (Luke) to complement BALTFISH draft Joint Recommendation regarding a derogation from the landing obligation in the Baltic Sea establishing a discard plan as regards salmon in the Baltic Sea (ICES Subdivisions 22-32)

Dear Ieva Žundienė,

Thank you for sharing the newly available manuscript from the Natural Resources Institute Finland (Luke) with the BSAC with regards to the draft Joint recommendation regarding a derogation from the landing obligation on salmon¹.

The draft Joint Recommendation presents scientific evidence as required by Article 4 of the Delegated Regulation 2021/1417, and proposes to extend the exemption to salmon caught from the pontoon trap that are emptied directly into a water hold in the fishing vessel.

It was assessed by STECF during its winter plenary in November 2022 where some deficiencies were identified by STECF². The scientific study is meant to adjust the deficiencies identified by STECF in the draft Joint recommendation.

The BSAC Executive Committee was consulted and asked if they wanted to raise further comments from the ones sent to BALTFISH on the 27th October 2022 on the same draft Joint Recommendation³.

¹ Not publicly available yet

² Scientific, Technical and Economic Committee for Fisheries (STECF) – 71st Plenary report (STECF-PLEN-22-03). Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/016673, JRC132078. Pages 75-81, <https://stecf.jrc.ec.europa.eu/documents/43805/43440856/STECF+PLEN+22-03.pdf/d0acb3d4-6b6a-4067-9d08-0b6004660e25>

³ <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-letter-to-BALTFISH-on-derogation-from-landing>

You have invited the BSAC to send comments by Thursday 23rd February 2023. The short deadline did not allow for a BSAC meeting dedicated to this topic.

The replies received from members are attached to this letter in one paper.

STECF spring plenary meeting is scheduled for the 20th March 2023 and we thank you for consulting BSAC ahead of this meeting.

Kind regards,



Jarek Zieliński
BSAC Executive Committee Chair