

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 2023-2024/09

Copenhagen, Wednesday 7th June 2023

Subject: BSAC comments on the amendments to the 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 latest amendments proposed to the BALTFISH draft joint Recommendation with the BSAC¹.

The draft Joint Recommendation presents scientific evidence as required by Article 4 of the Delegated Regulation 2021/1417, and proposes to extend the exemption of the landing obligation for salmon caught from the pontoon trap, trap nets, fyke nets.

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 and the 22nd February on the previous drafts of the Joint Recommendation².

You have invited the BSAC to send comments by Wednesday 7th June 2023. The short deadline did not allow for a BSAC meeting dedicated to this topic.

Two replies were received: one from the OIG group of BSAC³ and one from SFPO, both sending the same comments as in February. The OIG group highlighting its concerns that BALTFISH had not taken them on board. The full comments are attached to this letter.

¹ Not publicly available yet

² <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-letter-to-BALTFISH-on-derogation-from-landing> and <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-comments-on-additional-document-for-BALTFISH>

³ From: Baltic Salmon Rivers Assoc., CCB, DAFV, EEA, FANC, FishSec, WWF

STECF additional plenary meeting is scheduled for the 15th June 2023 and we thank you for consulting BSAC ahead of this meeting.

Kind regards,



Jarek Zieliński
BSAC Executive Committee Chair