

Director General
Mr. Fokion Fotiadis
D.G. Fisheries and Maritime Affairs
Rue de la Loi 200
B-1049 Brussels
Belgium

Date: 31 May 2007

Subject: Consultation on the Commission's Communication on discards

Dear Mr. Fotiadis,

Thank you for consulting the Baltic Sea RAC (BS RAC) on the Commission's Communication on discards.

The BS RAC has only had little time for discussions on the Communication and the questions put forward by the Commission. Therefore, at this time the BS RAC only have a few rather general comments.

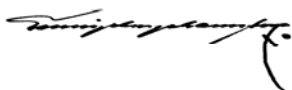
As you are probably aware, four major fisheries are conducted in the Baltic: cod, herring, sprat and salmon. These fisheries have very different levels and patterns of discards and will have to be dealt with separately – as we believe is the intention of the Commission.

Compared with many other EU fisheries, the Baltic fisheries have very low levels of discards (1.4 %¹), with an average discard rate of 7 % in the cod trawl fishery and 5 % in the salmon and cod gillnet fisheries. As few other species are caught, current discards primarily contain specimen of the target species that are below the legal minimum landing size. It is the opinion of the BS RAC that these discards can be dealt with appropriately, if not fully, via technical measures.

For your information, the BS RAC will explore ways to further reduce the discard levels in the cod fishery in cooperation with ICES. A meeting is scheduled to discuss the selectivity of the BACOMA window and the T 90 trawl, and any possible alterations to improve selectivity.

We look forward to a continued discussion on possible ways to reduce any discards, as well as any relevant monitoring and control measures, in the Baltic fisheries. We consider that close cooperation between management authorities, the industry and other relevant stakeholders is a prerequisite for a positive resolution of these issues.

Yours sincerely,



Reine J. Johansson
Chairman of the BS RAC

¹ Commission staff working document accompanying the Communication on a Policy to reduce unwanted by-catches and eliminate discards in European fisheries (SEC(2007)380)