

European Commission  
D.G. Fisheries and Maritime Affairs  
Att.: Stefanie Schmidt

9 October 2006

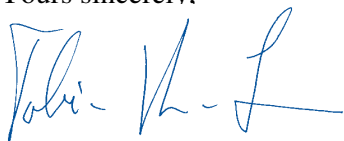
Dear Stefanie,

Thank you for the invitation to send comments and suggestions to the draft Terms of Reference for an impact assessment on the multi-annual plan for cod in the Baltic.

Our comments are as follows:

- The BS RAC misses an evaluation of the probability of recovery to the historic levels of biomass – in particular for the Eastern stock. This is to find out if the reference biomass levels are relevant with the prevailing environmental condition.
- The BS RAC recommends that the study includes an evaluation of when the two cod stocks are considered within safe limits and how this should be evaluated.
- The BS RAC recommends that the study also focus on, to what extent the plan will impact the level of compliance.
- The study must evaluate how monitoring and enforcement can be more effective through the implementation of harmonized, transparent and more simple regulations and enforcement systems.
- It should be evaluated whether the success of the multi annual plan is dependent on reductions in fleet capacity and to what extent.
- There is a need also to investigate the effect of a similar plan – without the decrease in effort – and with decrease in effort only to be applied when the stocks are below Bpa.
- Under the heading “Timetable and reports” the second paragraph mentions the obligation to participate in a meeting with “...the Commission and a representative of the Baltic Sea RAC.”, this should be changed to “...the Commission and representatives of the Baltic Sea RAC.”

Yours sincerely,



Tobias Kerm-Jespersen  
BS RAC Secretary