

Director-General Ms Charlina Vitcheva,
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Sent by e mail to: Charlina.VITCHEVA@ec.europa.eu; mare-ac@ec.europa.eu
cc: BALTFISH Member States, ICES

Ref: BSAC/2023-2024/25

Copenhagen, Tuesday 17th October 2023

Subject: Follow-up to Baltfish Forum, 5th September 2023

Dear Ms Vitcheva,

The Baltic Sea Advisory Council welcomes the Commission's presentation, at the Baltfish Forum meeting of the 5th September 2023, of its proposal for Baltic TACs for 2024. The BSAC takes note, in particular, of the proposals to reduce TACs for cod, herring, sprat, and salmon, or even close all targeted fisheries for 5 of the 10 stocks. At the same time, the BSAC takes note of the Commission's non-paper published on 19th September 2023, containing updates on the Commission's TAC proposal for the remaining stocks which were marked as *pro memoria*, pending further ICES advice. ICES was not able to provide additional advice in the end. The BSAC notes that the process of requesting additional research from ICES was made already in October 2022 at the AGRIFISH Council meeting a year ago.

As the Commission is aware, these proposals give many stakeholders serious cause for concern regarding their livelihood. The BSAC also recognises that the fishery in the Baltic is severely challenged as highlighted in the BSAC recommendations for the fisheries 2024¹.

The BSAC acknowledges the information received from the Commission's representative that the Management Plan for the Baltic (MAP) does not lay down a requirement to accompany measures adopted under the MAP by evaluations of their socio-economic impact. However, the BSAC recalls the CFP objective that long-term environmental sustainability goes along with achieving economic, social and employment benefits. **Therefore, the BSAC is of the opinion that proposals such as the one made this year should be developed also in the light of their socio-economic impact.** The BSAC welcomes the statement made by the Commission representative that the Commission intends to discuss with Member States

¹ <https://www.bsac.dk/wp-content/uploads/2023/05/BSACrecommendationsTAC2024revised10072023.pdf>

possible ways to support the sector. Such support would be very important for vulnerable fishers and all sectors and communities that depend on them, especially in case of closures.

In connection with the discussions held in BALTFISH Forum as well as the BSAC working groups held in September on the Commission's proposals for Baltic TACs, **the BSAC recommends to the Commission to ask ICES to evaluate the new method behind setting reference points for central herring.** This matter could be considered by the ICES workshop on rebuilding strategies "WKREBUILD2-Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks"².

Furthermore, we would also like to ask the Commission to give some clarifications on what is exactly meant by the term "unavoidable by-catch", used in the Commission's proposal and the non-paper.

At the same time, **the BSAC would like to ask the Commission for more transparency in requesting scientific advice.** While the Commission has every right to ask ICES for particular advice for the Baltic, the BSAC is of the opinion that the Commission should share copies of such requests with the Advisory Councils when they are being formulated and discussed. We consider this a way of ensuring transparency and appropriate involvement of stakeholders, in particular Advisory Councils, at all stages. The BSAC welcomes the current work of ICES³ on stakeholder engagement aimed at ensuring the effective and balanced participation of stakeholders in developing the advice. The BSAC supports the recent NSAC Advice⁴ to start opening up to stakeholders' engagement in the request design stage of scientific advice. In this context, knowing exactly what ICES has been asked for enables Advisory Councils to better understand the advice. Without such transparency, the Commission distracts from the BSAC's ability to provide relevant stakeholder input on matters of vital interest to many of its members.

Kind regards,



Lise Laustsen
BSAC Pelagic Working Group Chair



Jarek Zieliński
BSAC Executive Committee Chair

² <https://www.ices.dk/community/groups/Pages/WKREBUILD2.aspx>

³ <https://www.ices.dk/community/groups/Pages/WKSTIMP.aspx>

⁴ <https://www.nsrac.org/wp-content/uploads/2023/10/16-2223-NSAC-Advice-on-stakeholder-engagement-in-ICES-Advice-requests.pdf>