

BSAC response to the communication from the Commission to the European Parliament and the Council “Towards more sustainable fishing in the EU: state of play and orientations for 2024”

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INTRODUCTION

The **BSAC** takes note of the Commission’s Communication and accompanying Staff Working Document. The **BSAC** provides feedback and comments following the Commission’s request. On 7th July 2023, the BSAC has already sent its recommendation for the fishery in the Baltic Sea in 2024 to the Commission¹.

1. Progress on sustainable fishing

In its response to the Communication the BSAC would like to highlight some of the issues that were put forward in the previous BSAC recommendations².

The **BSAC** acknowledges that this year more than ever the Baltic is severely challenged. In addition to the threats to the marine environment posed by climate change, the fisheries sector has also been dealing with a series of major challenges, most recently, the repercussions of the war in Ukraine have significantly disrupted the fishery and the fish market in the Baltic and resulted in high fuel prices, logistic issues and disruptions in market supplies.

The **BSAC** would like to highlight the need for a more holistic approach to fisheries, in the context of the Green Deal and Biodiversity Strategy. In line with these strategies, the fisheries sector plays an important role in ensuring food security in Europe. Fish and seafood products generate a lower carbon footprint than animal production on land. In the near future, the sector is expected to provide more fish to the market to replace red meat. The Farm to Fork Strategy recognises the need to ensure the livelihood of primary producers such as fishers for the transition to a sustainable EU food system³.

The **BSAC** welcomes the Ocean Package⁴ published by the Commission to tackle the key challenges and improve the resilience of EU fisheries. The BSAC working groups are preparing recommendations on the different actions foreseen in the package.

¹ <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-fisheries-2024>

² [http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-fisheries-2024/BSACrecommendationsTAC2024revised10072023-\(2\).pdf.aspx?lang=en-GB](http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-fisheries-2024/BSACrecommendationsTAC2024revised10072023-(2).pdf.aspx?lang=en-GB)

³ Farm to Fork Strategy [EUR-Lex - 52020DC0381 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/lexUri.do?uri=CELEX:52020DC0381:EN:EUR-Lex)

⁴ https://ec.europa.eu/commission/presscorner/detail/en/IP_23_828

The BSAC regrets that despite the fact that the Commission underlines the fundamental role of the ACs in the implementation of the CFP, some of the BSAC advice and recommendations had not been taken into account by the decision-makers in recent years. The Commission's Staff Working Document highlights the good cooperation between the BSAC and BALTFISH. The BSAC will continue to cooperate with BALTFISH and its Presidency in 2023-2024.

The BSAC will also continue to improve cooperation with the European Fisheries Control Agency (EFCA).

2. Setting fishing opportunities

The BSAC continues to underline that fisheries management and science should focus on the overall ecosystem, as well as other factors that are affecting the well-being of certain stocks. In the Baltic specifically, ecosystem, multi-species considerations and food-web interactions must be taken into account in the overall policy orientations. Science should make more effort to understand the underlying causes and problems. To facilitate this process, the BSAC plans a workshop on additional science in early 2024.

The BSAC is well aware that the effects of climate change are becoming increasingly noticeable across the Baltic Sea and there is a clear need to take measures to mitigate its effects on fish stocks and fisheries. To this end, in May 2023 the BSAC held a webinar on climate change⁵ and works on the recommendation on the energy transition in the framework of a BSAC Focus Group.

In May 2023, **the BSAC** organised the workshop on the Multiannual Plan for the Baltic (MAP) to discuss and hear the stakeholders' views 7 years after the adoption of the plan and 3 years after its first evaluation. The meeting concluded, among others, that there is a need to revise the MAP in view of the current state of the fish stocks, in order to adjust it to the on-going changes in the ecosystem.

The BSAC decided to organise a follow-up meeting on the Baltic MAP in the near future. **The BSAC members welcome** the upcoming evaluation of the MAP planned by the European Commission in 2024 and request further discussion ahead of the evaluation scheduled by the Commission.

The BSAC takes note that the Commission plans to move, where possible, to a system of multiannual TACs for EU only stocks. In the case of the Baltic, this will increase efficiency and predictability for the fisheries. The BSAC is of the opinion that nevertheless an updated advice should be given for each stock annually, in order to take account of any new developments of the stocks, as it is the case of the western Baltic cod.

3. State of the fleet and economic performance

The rise in fuel prices, as well as the costs of energy used for processing and storing the catches, caused by the Russian invasion in Ukraine has had a substantial impact on the

⁵ [BSAC - WEBINAR: Climate change and natural mortality in the Baltic Sea](#)

Baltic fishing fleets. There is a need for a more substantial reflection on the energy transition, including socio-economic aspects and other kinds of aid to convert or adapt the sector.

The BSAC recognises the need to reduce dependency on fossil fuels and move to renewable and low-carbon energy sources as quickly as possible. In order to prepare the recommendations on the energy transition, the BSAC has set up a Focus Group on energy transition.

The BSAC hosted a presentation of the STECF Annual Economic Report last October which triggered remarks from the members on the economic performance of the different fleet segments and the reasons for the difficulties encountered. The discussions will be carried forward when STECF will publish its updated report this year.

4. Landing obligation

The BSAC takes note that Member State action to monitor and enforce the landing obligation remains insufficient. The main risks associated with the landing obligation, such as illegal and undocumented discards of catches during fishing at sea, are not mitigated sufficiently.

The BSAC welcomes progress with regard to the new Control Regulation after five years of tough negotiations between the Commission, the European Parliament and the Council. Control and implementation can be improved through a revised Control Regulation and the Technical Measures Framework, whereby gear changes and developments can be more swiftly implemented.

The fishing opportunities for Baltic cod, in both east and west, limited to a bycatch quota, bring into focus the imperative need to use technical solutions to reduce the catch of cod whilst continuing fisheries for stocks that have a good status. **The BSAC** had repeatedly appealed for more selective gears being deployed in the Baltic, and for faster approval processes and at the same time pointed to the need for the correct formulation and interpretation of the rules on technical measures concerning gear designs and the need to consult the Delegated and Implementing Acts to Technical Measures Regulation 2019/1241 with the fisheries sector. The BSAC fisheries members anticipate serious technical problems related to the mandatory use of the new gears, especially on small vessels. **The BSAC therefore recommends**⁶ to the Commission to modify the legal texts in order to open up the possibility to use the new gears while postponing their mandatory use by at least one year.

The BSAC will hold a workshop with EFCA and BALTFISH following the publication of the EFCA report on the evaluation of compliance with the Landing Obligation in the Baltic Sea.

⁶ <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-on-the-legal-Acts-introducing>

5. Main messages and orientations for 2024 fishing opportunities proposals

As stated, the BSAC has already delivered its recommendations for 2024 and anxiously awaits the Commission's proposal for the Baltic. The challenges for the Baltic continue.

For example, ICES has again advised zero catches for the eastern Baltic cod and the western Baltic herring stock. The BSAC recommends to maintain a bycatch TAC for the eastern and western Baltic cod and western Baltic herring at the same level as in 2023. There are minority positions for these stocks.

The BSAC agreed that the commitment behind the CFP should be based on the available scientific advice. However, the available advice does not always match the challenges inherent with ecosystem-based management, such as interspecies relationship, natural stock fluctuations and ecosystem regime shifts.

The BSAC highlights the need for the environmental factors to be quantified, assessed, and taken into account. This not only applies to nutrient flow and low oxygen levels but also pertains to species interactions, including prey-predator relationships (predation during life cycle, parasites, competition) and habitats loss or severe habitat modifications. To this end, the BSAC will discuss the mixed fisheries and species interactions in dedicated meetings. The BSAC will also organise a workshop on predators (cormorants and seals) on the 27th October 2023 to present the status of these species, legal considerations and current management.

In the BSAC, there is agreement on the continued need to focus on the overall ecosystem, and the other factors that are affecting the well-being of certain stocks. Fishing is one of the factors that is having an influence on the stocks. Several other challenging developments are occurring at the same time, among other species interaction and climate change..

CONCLUSION

The BSAC supports the overall objective by the Commission on the need to protect resources. At the same time, the BSAC draws attention to the need to ensure food supplies and sustainable revenue for EU fishers.