

The BSAC input to the roundtable meeting with the Commissioner

7th December 2023

Representatives from BSAC: Executive Committee Chair (Jarek Zielinski), Executive Committee Vice-Chair (Glenn Douglas)

The Baltic Sea Advisory Council (BSAC) would like to thank the Commissioner for his invitation to this roundtable held before the December AGRIFISH Council meeting, and for dedicating specific time to Baltic stocks before the October Council this year.

The BSAC would like to contribute to this roundtable discussion by highlighting three topics of particular importance to us:

- 1/ Recommendations on transparency of requests to ICES and socio-economic considerations in Commission fishing opportunities proposals.**
- 2/ Follow-up on the implementation of the Marine Action Plan.**
- 3/ Recommendations on stocks: two migratory - shared stocks, eel, and western Baltic spring spawning herring, which are also fished in the Baltic Sea.**

1. Recommendations on transparency of requests to ICES and socio-economic considerations in Commission fishing opportunities proposals

The BSAC warmly welcomes the Commission's offer to participate in the upcoming BSAC Executive Committee meetings to discuss ongoing and future ICES requests. ICES is an independent organisation, but hopefully you will agree that the exact formulation of such requests greatly influences the output since ICES advice is constrained by the framework of such request, as it is bound to answer the questions posed by requesters.

The BSAC would especially use such an opportunity to seek clarity on the ongoing requests about Baltic herring stocks. We therefore invite your services to participate in the BSAC Executive Committee meeting on 24th January 2024 in Warsaw.

The BSAC acknowledges that the Commission must implement the Baltic MAP as laid down by the European Parliament and the Council of the European Union. However, the BSAC insists that a MAP cannot be implemented in isolation and must be held up against the CFP Regulation which in several places stipulates the need to take account of the socio-economic consequences of measures, including those included in the MAP.

In this context, an extra layer of transparency towards stakeholders could be provided by an impact assessment of the socio-economic consequences. The Council would certainly also benefit from such impact assessment when fixing fishing opportunities within the permitted ranges. A socio-economic impact assessment would also help Member States in allocating public funding to assist the implementation of the CFP. By its very nature, such public funding, be it Union or national funding, is intrinsically linked to the socio-economic consequences of the political decisions taken under the CFP.

2. Follow-up on the implementation of the Marine Action Plan

The BSAC is preparing recommendations on the Marine Action Plan. These recommendations should be presented to you within the next few weeks.

In addition to the comments made in the recommendations on selectivity, environmental restoration, technical measures, and others, the BSAC welcomes the creation of the Joint Special Group and would like to be informed about progress in the implementation of this Action Plan.

The BSAC would also like to ask how Advisory Councils and stakeholders can participate in the implementation of the Action Plan, along with the Commission and Member States.

3. Recommendations on stocks

Eel

This year the BSAC recommended that European eel should be part of the work programme of the Joint Special Group. In addition, the BSAC recommended that the Commission publicly share the draft update of the Eel Management Plan guidance document and inquires on how the agreement on Biodiversity Beyond National Jurisdiction or “High Seas Treaty”, recently signed by the EU, could help protecting eels throughout their life cycle¹.

A dedicated meeting is being planned with the Commission, HELCOM, and BALTFISH.

The BSAC agrees that the eel stock is in a serious state and more measures are needed to deal with this complex issue. However, the BSAC is not in agreement on the ICES advice² of zero catches in EU waters³, and would like to refer to its recommendations on eel from May 2022⁴.

The recommendations put much emphasis on reacting swiftly and on the many sources of eel mortality not linked to fishing, as well as a series of other recommendations regarding eel.

Western Baltic herring

For the BSAC, the issue at stake pertains to management choices. The EU Baltic Sea MAP applies to herring in ICES subdivisions 22–24 and is therefore limited, exclusively, to the Baltic, not taking into account the adjacent waters. As pointed out by Director General Charlina Vitcheva, there is “*important intermixing of western Baltic herring with NSAS herring in the Skagerrak and eastern North Sea.*”. The EU Baltic Sea MAP plan has not

¹ https://www.bsac.dk/wp-content/uploads/2023/10/BSAC-letter_Joint-Special-Group_eel23-24-24.pdf

² https://ices-library.figshare.com/articles/report/European_eel_i_Anguilla_anguilla_i_throughout_its_natural_range/21907860

³ The majority of the BSAC members reject the ICES advice of zero catches. A minority does not agree with the statement rejecting the ICES advice.

⁴ https://www.bsac.dk/wp-content/uploads/2023/08/BSACChairLetterandrecseel22-23_5Complete.pdf

been adopted by Norway and therefore is not used as basis of the advice for this shared stock.

The BSAC recommends a twofold approach to the management of this stock.

- **In the short term**, the BSAC agrees that the Multi Annual Plan for the Baltic Sea should be used as a rebuilding plan for the western Baltic spring spawning herring. It can be the guiding tool for the management of this stock for now.
- **In the midterm**, the BSAC recommends that a specific long term rebuilding plan be prepared and discussed with the third countries. The BSAC exchanged letters with the Commission on this topic⁵ that now seems stalled. In the latest reply from the Commission, DG MARE explained that “*There are no discussions today on a rebuilding plan with UK and Norway for this stock since these countries do not consider themselves responsible for the management of the stock. The development of a rebuilding plan should be handled as a domestic management issue*”. The BSAC has decided to invite the Norwegian authorities to discuss the matter and the possibility to establish a long term rebuilding plan with them⁶.

In the context of this intervention, the BSAC reiterates its recommendation that a specific long term rebuilding plan be prepared in cooperation with Norway. ICES work through its workshop guidelines and methods for the evaluation of rebuilding plans could be useful for this purpose.

⁵<https://www.bsac.dk/wp-content/uploads/2023/08/Letter-followup-wbheel-2022-2023-33.pdf> and <https://www.bsac.dk/wp-content/uploads/2023/08/Reply-to-BSAC-on-WSSH-25-07-2023.pdf>

⁶ <https://www.bsac.dk/wp-content/uploads/2023/08/BSACPelagicWG26092023-REPORT-FINAL.pdf> see page 5