

BSAC recommendations on the Commission Communication on CFP today and tomorrow

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Introduction

This document presents the BSAC recommendations on a shortlist of actions from the *Commission Communication on CFP today and tomorrow: a Fisheries and Oceans Pact towards sustainable, science-based, innovative and inclusive fisheries management*¹ (later called CFP Communication) identified by BSAC ExCom to be relevant for BSAC.

[BSAC already delivered its recommendations on the EU Action Plan](#) in December 2023, these recommendations focus on the CFP Communication. It has been prepared based on discussions in the EBM WG in October 2023 and in the Demersal, Pelagic and EBW WG in February and March 2023.

Actions where Advisory Councils are explicitly mentioned

The CFP Communication explicitly mentions Advisory Councils under 4 actions.

The first one pertains to the evaluation of the **Landing Obligation** that the Commission will undertake. Advisory Councils (ACs) should be consulted in spring 2024 and the Commission has confirmed that they will come back with questions in Q2-Q3 2024.

The BSAC highlights that EFCA's report on the evaluation of compliance with the Landing Obligation in the Baltic will be useful to provide input to the Commission evaluation. The BSAC also notes that the available data on spatial distribution and species geographic/time overlap should be taken into account, in order to better implement the Landing Obligation.

The second action addresses to the **Member States' fisheries regional groups** to better involve stakeholders. The BSAC welcomes this action and repeats that there has been good cooperation with BALTFISH Presidency in the past years.

The third action calls on ACs to make recommendations regarding the **Energy Transition**. The BSAC recalls that it addressed this under its recommendations on the energy transition of the Baltic Sea fisheries sector². The recommendations covered: infrastructure requirements, financial support for the transition, overcapacity and capacity ceiling, pilot projects and research, broader considerations, governance and outreach.

The final action that explicitly mentions the ACs invites them to contribute to the **creation of an annual award for sustainable innovation in fisheries**, with a view to handing it out

¹ https://oceans-and-fisheries.ec.europa.eu/publications/common-fisheries-policy-today-and-tomorrow-fisheries-and-oceans-pact-towards-sustainable-science_en

² <https://www.bsac.dk/wp-content/uploads/2023/10/BSACletterEnergyTransition-2023-2024-23.pdf>
<https://www.bsac.dk/wp-content/uploads/2023/10/BSACrecommendationEnergyTransition.pdf>

for the first time in 2024. The BSAC is not able to formulate a proposal on this but highlights that in any case, it is important to understand “innovation” as both technical innovation but also innovation in the approaches (scientific approach and management approach including legal/regulation changes).

Other actions not directly linked to Advisory Councils

A number of other actions have also been flagged by the BSAC Executive Committee as relevant for the BSAC to comment on.

Pact for Fisheries and Oceans'

The Commission announces a '**Pact for Fisheries and Oceans**' that will support the full implementation of the Common Fisheries Policy (CFP). The BSAC welcomes this action and the recognition of the role of stakeholders in this process. The BSAC brings together stakeholders and therefore has a key responsibility here. In February 2022, the BSAC published its white paper on the CFP³ that highlights important issues and points to suggestions for improvement of the CFP and its implementation.

Fishers of the Future

A foresight project on '**Fishers of the Future**' is announced for 2023-2024. The BSAC members have been consulted through a survey in February by the project leaders. The BSAC notes that its recommendations on energy transition⁴ included a provision calling the Commission and Member States to “*help fishers diversify their activities and attract a new generation of fishers where there is a sustainable future*”. The BSAC also points that the topic of generation renewal in the fisheries has been added to its Work Programme for 2024-2025.

Social indicators

The CFP Communication also foresees the development of **social indicators by STECF and further develop social indicators to be used in the analysis of socio-economic reports**. The first STECF report with such work has now been published (STECF 23-17)⁵. This is also the focus of an ongoing consultation of the Commission.

The BSAC sees a need to introduce social indicators, that should also consider the support structures for fisheries, including recreational fishing. For example: full time employment, geographic distribution of the industry, number of active harbours, value chains and exports structures.

The BSAC highlights the shortcomings in the indicators currently used in STECF report (accounting for part time work, measure of fishing effort, etc). The BSAC asks to be

³<https://www.bsac.dk/wp-content/uploads/2023/08/White-paper-02-05-2022forprintandweb.pdf>

⁴ <https://www.bsac.dk/wp-content/uploads/2023/10/BSACrecommendationEnergyTransition.pdf>

⁵ https://stecf.ec.europa.eu/document/download/cbcfe4ae-98f8-401f-9400-476ceefe33f4_en

consulted in the development of socio-economic indicators, in order to ensure proper interpretation of the results presented in the report. More details are given in the BSAC letter to STECF on the AER report from November 2023⁶.

MSY objective

In the CFP Communication, the Commission calls on Member States to focus efforts on ensuring the **MSY objective is reached** in all sea basins in the discussions on 2024 fishing opportunities. The BSAC recalls its recommendations for the fisheries 2024⁷ but also general recommendations regarding reference points under BSAC White Paper on CFP⁸. In May 2023, the BSAC held a workshop on Baltic MAP⁹ where participants expressed the view that the MSY target needs to be adaptative to the changing environmental conditions.

In addition, some members argue about the need to use Bmsy instead of Bpa as a threshold when setting the fishing opportunities. They favour moving away from single stock management/indicators and indicate that fishing mortality rates need to vary depending on the trophic level of the stock. For example, lower trophic level prey species should be fished at 0.3-0.5 Fmsy, whereas for higher level predatory species up to 0.8 Fmsy.

Ecosystem-based approach to EU fisheries management

One action focuses on the ecosystem based approach and the need to develop scientific advice in support of **the ecosystem-based approach to EU fisheries management** in 2023 and 2024.

There is agreement in the BSAC 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. The BSAC welcomes the fact that ICES advice in 2023 included a chapter on conservation status for some stocks in order to deliver ecosystem-based management options. The BSAC is of the opinion that estimation and quantification of the effects of species interactions need to be undertaken urgently.

The BSAC strongly supports the increased Commission's efforts to develop scientific support for the ecosystem-based approach to EU fisheries management (EAFM). At the same time the BSAC reminds that pressures from other human activities such as offshore wind energy developments and their impact should also be considered. The BSAC also highlights climate change led impacts on the Baltic ecosystem, and its fisheries. These impacts on the Baltic Sea, its ecosystem and fisheries should be better understood, in

⁶ https://www.bsac.dk/wp-content/uploads/2023/11/BSAC_RecommendationsSTECF_AER-2022-2023-32.pdf

⁷ <https://www.bsac.dk/wp-content/uploads/2023/08/BSACrecommendationsTAC2024revised10072023-2.pdf>

⁸ <https://www.bsac.dk/wp-content/uploads/2023/08/White-paper-02-05-2022forprintandweb.pdf>

⁹ <https://www.bsac.dk/wp-content/uploads/2023/07/BSACworkshopMAP17052023reportfinal.pdf>

order to develop management strategies to adapt to climate change. In this context, the BSAC draws attention to the conclusions of the BSAC Webinar on climate change¹⁰.

The BSAC is of the opinion that the MAP as well as the technical measures should be revised to take account of the changes in the state of the fish stocks and the environment, including the interspecies considerations.

Single use plastic directive & marine litter

The CFP Communication also refers to **the single use plastic directive implementation and the issue of marine litter**. The BSAC recalls the Multi-AC Advice on the implementation of the Single Use Plastics Directive and operational aspects of the Fishing for Litter Scheme¹¹ published in 2020. Specifically, it highlights the reference to the need for Member States to support the collection of passively fished waste from fishing vessels. The BSAC also recalls that a considerable proportion of plastic litter comes from land-based sources and recognises the need for a preventive approach.

Finally, the BSAC underlines the need to take into account the impact of recreational fishing activities in relation to marine litter and abandoned/lost/discarded fishing gears. In this regard, Member States should apply a preventive approach and implement measures for all sources of marine litter.

Allocation of fishing opportunities

The BSAC welcomes the action proposing that **STECF analyses the criteria used by Member States for the allocation of fishing opportunities** at national level and that the Commission prepared a **vademecum on the allocation of fishing opportunities** in order to improve transparency, promote sustainable fishing practices across the EU, and support small-scale and coastal fishers. This is also the focus of an ongoing consultation of the Commission.

The BSAC is of the opinion that Member States should be transparent and publish these criteria and is specifically interested in an analysis of the ITQ system results and how it has affected capacity (Gt, Kw) and catching capacity. Finally, the BSAC recommends that the implementation of the landing obligation should also be included as an indicator when evaluating the criteria used for allocation of fishing opportunities at national level.

Transparency in fishing capacity management

The last action flagged as relevant for BSAC pertains to the **increase the transparency and flexibility of Member States fishing capacity management**. The BSAC recalls that it has already encountered difficulties to assess capacity issues because of lack of transparency on that topic under its recommendations for the energy transition¹².

¹⁰ <https://www.bsac.dk/wp-content/uploads/2023/07/Save-the-date-WEBINAR-ClimateChangeBaltic4May-1.pdf>

¹¹ <https://www.bsac.dk/wp-content/uploads/2023/08/FINAL-Multi-AC-advice-implementation-of-SUP-Directive.pdf>

¹² <https://www.bsac.dk/wp-content/uploads/2023/10/BSACrecommendationEnergyTransition.pdf>