

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 2025”

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INTRODUCTION

The **BSAC** takes note of the Commission’s Communication and accompanying Staff Working Document. The **BSAC** is hereby providing, as requested by the Commission, comments to the Commission’s Communication and the accompanying Staff Working Document¹.

The **BSAC** takes note of the Commission report on state of play and the orientations that the Commission intends to follow in its proposals for 2025. It regrets that despite the Commission underlining the essential role of the ACs in “shaping policy”, some of the BSAC advice and recommendations, in particular the recommendations for the fishery of Baltic stocks does not seem to have 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 2024-2025.

The **BSAC** will also continue to improve cooperation with the European Fisheries Control Agency (EFCA) and will take part in a workshop on the recently published EFCA report on the Landing Obligation in the Baltic Sea in 2019-2021.

1. Progress on sustainable fishing

Referring to the environmental situation in the Baltic and the multiple pressures faced, as mentioned in the Commission’s communication, the BSAC recalls its comments of the 5th July 2024 from the recommendation for the fishery in the Baltic Sea in 2025 to the Commission²:

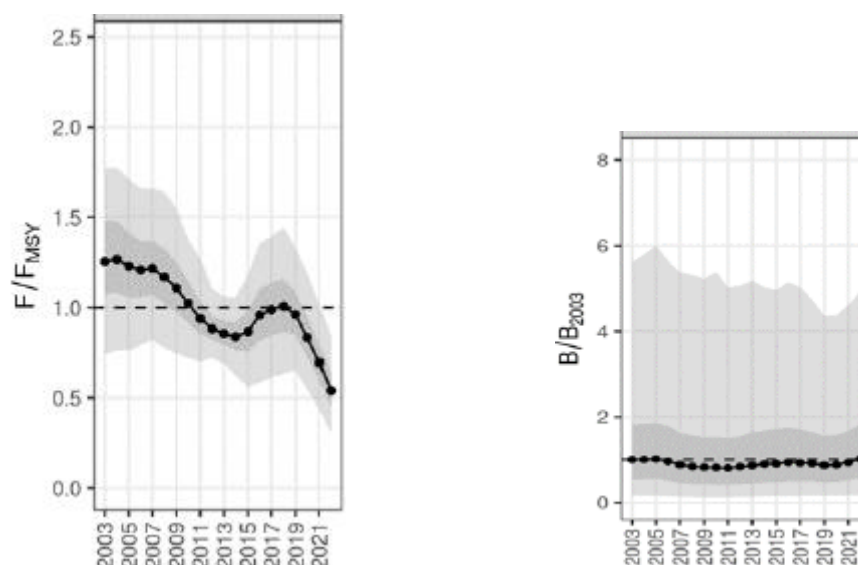
[The BSAC agrees] on the continued need to focus on the overall ecosystem, and the other factors that are affecting the well-being of certain stocks. Fishing is one of the factors that may have an influence on the stocks, although for several stocks in the Baltic fishing pressure is presently very low. Several other challenging developments are occurring at the same time, among other species interaction and climate change, eutrophication, and changes in salinity. Changes in ecosystem productivity in general raises the question of a regime shift. The BSAC is of the opinion that estimation and quantification of the effects of species interactions need to be undertaken urgently.

¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14294-Sustainable-fishing-in-the-EU-state-of-play-and-orientations-for-2025_en

² <https://www.bsac.dk/wp-content/uploads/2024/07/BSACrecommendationsfisheryBalticin2025.pdf>

Over recent decades, the rapid growth of seal and cormorant populations have caused substantial challenges to fisheries in the Baltic. Seals and cormorants are considered one of the major threats to the profitability of fisheries sector in the region [but also to some fish stocks and supply of those to markets]. The BSAC organised a workshop on predators (seals and cormorants) in October 2023. The objective of the workshop was to gain feedback on the legal rules and management measures related to seals and cormorants, on the status of populations, monitoring and interactions of seals and cormorants with fish stocks and fisheries. A follow-up workshop will take place in October 2024 with particular focus on concrete management measures at regional level.

The BSAC points out to the fact that the graphs illustrating general trends in the fishing mortality and biomass, included in the Communication, are of limited use in the Baltic context because of the fact that the Baltic is a special case, suffering from multiple pressures beyond fisheries. The dedicated graph illustrates specifically the fishing mortality and do not show other factors driving changes in natural mortality and influencing the resulting Biomass levels.



Graphs from the Commission's Staff working Document SWD(2024) 139 final: Upper trends in the average (median) F/F_{MSY} (left) and biomass (B/B_{2003}) (right) over the period 2003-2022 in the Baltic Sea.

The BSAC members also call for additional science to examine the problems of regime shift in the Baltic and species interrelations (such as predation). There is a need for a more substantial reflection on socio-economic aspects and the future of the fisheries and food production.

However, some members of the BSAC³ believe that socio-economic considerations should only be considered when fish stocks are well above critical reference points like Blim and Btrigger, as it is essential to ensure the long-term reproduction capability of fish stocks first. Other members of the BSAC⁴ strongly disagree and underline the need to implement inclusive fisheries management, where fishers are also part of the decision-making process.

³ BalticWaters

⁴ DFPO

The **BSAC** agrees with the report regarding the need for Member States to apply and implement EU legislation in full to recover fish stocks. The CFP and the Baltic Sea MAP remain to be fully implemented and so does the environmental policies on land, the Farm to Fork strategies and other regulations.

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 is planning a second such webinar on climate change and adaptation in August 2024.

2. State of the fleet and economic performance

The BSAC recognises the need to reduce dependency on fossil fuels and move to renewable and low-carbon energy sources as quickly as possible. The BSAC has published its recommendations on energy transition in October 2023⁶. It specifically calls on the Commission to look more closely at the capacity rules and their impact on the energy transition, especially the definition and calculation of capacity.

The BSAC hosted a presentation of the STECF Annual Economic Report (AER) last October which resulted in a BSAC letter providing a number of recommendations⁷ to help improve the AER's data and methodology.

Some members of the BSAC⁸ take note that fleet segments that fish on stocks exploited sustainably and that have increased their energy efficiency tend to perform better and generate higher salaries for their crews. This illustrates the important socio-economic gains in stock conservation and energy efficiency by EU fishing fleets.

3. Landing obligation

The **BSAC** takes note of the Commission's launch of a study underpinning the evaluation of the landing obligation and has provided an answer to the first consultation on this topic⁹. Indeed, much more efforts are needed to adapt the landing obligation to the reality, in order to improve its functioning. The development of alternative gears can help implement better the landing obligation.

The BSAC is of the opinion that in order for catch accountability to work, the fishers (commercial and recreational) should be given the freedom to choose the fishing gear that

⁵ https://www.bsac.dk/past-meetings/?meeting_search=webinar&meeting_year=&loc=

⁶ <https://www.bsac.dk/wp-content/uploads/2023/10/BSACrecommendationEnergyTransition.pdf>

⁷ https://www.bsac.dk/wp-content/uploads/2023/11/BSAC_RecommendationsSTECF_AER-2022-2023-32.pdf

⁸ BalticWaters

⁹ https://www.bsac.dk/wp-content/uploads/2024/07/BSACreply-to-LOconsultation_2024-2025-13.pdf

best matches their specific conditions. Moreover, the provision of correct catch data is of utmost importance. Whether fish are discarded at sea or landed and then discarded, in most cases, makes no difference to the stocks.

Moreover, some members of the BSAC¹⁰ note that for several stocks the survival of small fish is very high if they are discarded immediately.

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 in 2019-2021.

The BSAC has repeatedly appealed for more selective gears being made available 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 fisheries sector on the Delegated and Implementing Acts to Technical Measures Regulation 2019/1241¹¹.

4. Setting fishing opportunities for 2025

As stated, **the BSAC** has already delivered its recommendations for 2025 and anxiously awaits the Commission's proposal for the Baltic.

The BSAC notes that the Commission will propose TACs and quotas following the Multiannual Plan for the Baltic Sea.

The BSAC recalls its *response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea (MAP)*¹², sent in April 2024, that is critical towards the MAP and called again for its revision.

Furthermore, the BSAC recommendation for the fishery in the Baltic Sea in 2025 to the Commission sent on the 5th July 2024¹³ highlighted that:

Fisheries management should follow rapid changes in the ecosystem. It is important to have an adaptive and fast decision-making process at regional level. The interactions between sea uses should be taken into account in fisheries management (such as dredging, sand and gravel extraction, offshore wind renewable installations).

An ecosystem-based fisheries management should also account for both the prey/predator relationship and harvesting patterns, and how environmental conditions affect the conditions of the stocks.

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. Ecosystem, multi-species considerations and food-web interactions must be taken

¹⁰ DFPO

¹¹ <https://www.bsac.dk/wp-content/uploads/2023/07/BSACImplementingActfishinggear2023-2024-13.pdf>

¹² <https://www.bsac.dk/wp-content/uploads/2024/02/BSAC-answer-COM-quest-MAP-report2024-2025-1.pdf>

¹³ <https://www.bsac.dk/wp-content/uploads/2024/07/BSACrecommendationsfisheryBalticin2025.pdf>

into account in the overall policy orientations. Science should make more effort to understand the underlying causes and problems.

The BSAC takes note of the Commission's plans to move, where possible, to a system of multiannual TACs for EU only stocks. In the case of the Baltic, this would 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.

Finally, **the BSAC members** are concerned about the management of the eel stock¹⁴. **The BSAC** is unanimous in calling for stronger focus and a faster pace in implementing national measures with respect to man-made, non-fisheries-related sources of mortality.

CONCLUSION

The BSAC supports the overall objective of the Commission on the need to protect resources which must take into account all factors influencing the fish stocks in the Baltic Sea.

Some members of the BSAC¹⁵ acknowledges that fleets fishing on sustainably exploited stocks perform better than fleets that depend on overfished stocks. Hence, there are important socio-economic gains in stock conservation that could be considered.

At the same time, the BSAC draws attention to the need to ensure food supplies and sustainable revenues for EU fishers.

The BSAC will contribute to the important work on the evaluation of the CFP that has just started. In that respect, it invites the Commission to specifically engage with Advisory Councils and to consult them in a way that accounts for their particular setting.

¹⁴ [\[Modtagerfelt\] \(bsac.dk\)](#)

¹⁵ BalticWaters