

## BSAC Ecosystem Based Management Working Group

21 May 2025

09.00 – 12.30 (CEST)

Lulea, Sweden and online through Zoom

### Report

#### 1. Welcome by the EBM WG Chair

The **WG Chair** welcomed representatives of the Commission (DG MARE), Member States, BSAC members, presenters (HELCOM and DG ENV), and observers. He was happy to chair the meeting for the first time close to the Bothnian Bay, a unique place in the Baltic.

#### 2. Formalities for the start of the meeting

Apologies, AOB, and adoption of the agenda

The agenda was adopted.

**Under the AOB** was noted a point by the Working Group Chair: information on the HELCOM draft salmon recommendation and FISH M meeting in May 2025.

**A small-scale fisheries representative** proposed to discuss a possible review of the BSAC position on Baltic Multiannual Plan.

#### 3. Presentation of the MSFD evaluation

*European Commission, DG ENV, Unit C2 (marine environment & clean water services)*

The **WG Chair** referred to the evaluation of the Marine Strategy Framework Directive (MSFD) published on 6<sup>th</sup> March 2025<sup>1</sup>. He reminded the BSAC members that the review of the MSFD is also part of the BSAC workplan, in the framework of the EBM Working Group<sup>2</sup>. He underlined that MSFD is one of the tools to improve the state of the Baltic and achieve good environmental status for each of 11 descriptors.

The **representative of DG ENV, Unit C2 (Marine environment & clean water services)**, presented the results of the evaluation<sup>3</sup> published in March 2025. She underlined that the evaluation had been conducted in line with the Commission's Better Regulation guidelines. The questions asked in the framework of the evaluation referred to the effectiveness, efficiency, coherence, added value and relevance of the MSFD. The findings of the evaluation report, published in March 2025 show, in terms of effectiveness, that this Directive set up a comprehensive integrated framework for protecting EU marine waters. It

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<sup>1</sup> [Marine environment - European Commission](#);

<sup>2</sup> The Marine Strategy Framework Directive: ongoing work with its the review, including work on those descriptors that are relevant to fisheries

<sup>3</sup> [Marine Strategy Framework Directive Evaluation 2025 | Environment](#)

has also generated vast amounts of data and knowledge on the marine environment that have led to a better understanding of our seas and oceans. Nevertheless, good environmental status (GES) has not been achieved across the 11 descriptors and all EU waters, and progress on the ground has been limited. The complexity of the legislation hinders the development of marine strategies and has resulted in an insufficient level of action in terms of reducing the key pressures on the marine environment. This includes the lack of clarity on key definitions and concepts (e.g. GES, EBA), and unclear procedures for the setting of legally binding thresholds at regional and EU level. Setting a 2020 deadline for achieving GES has proven unrealistic; instead, it would be better to have concrete operational targets in place that allow for monitoring progress towards GES of MSFD marine waters.

The MSFD has paved the way for the broad scale collection of data and building of knowledge on the marine environment, according to 11 descriptors. However, the data collected is not fully harmonised, often lacks sufficient quality, leaving important knowledge gaps: Data management could be improved through harmonised monitoring standards across EU marine regions and data quality control by experts/national research institutes. This would lead to higher quality harmonised data that can be used for Member State and regional assessments, data sharing with other digital platforms and communication with decision-makers and the public. Data management and reporting can be further facilitated by strengthening e-reporting and reducing reporting requirements where these do not directly serve policy needs.

Regional coherence and cooperation/coordination are key pillars of the MSFD, but regional differences persist: To strengthen regional cooperation, and ensure a higher level of regional coherence, there is a need for formal rules governing the interactions between EU policies and the Regional Sea Conventions (RSCs). At the same time, there is legal ambivalence in the Directive's requirements on regional coordination and coherence, making it difficult to enforce these rules.

In terms of efficiency, the MSFD has delivered cost effectively, as costs from implementation are superseded by the estimated benefits. Even so, most benefits are still to be enjoyed in the future, when GES is achieved across 11 descriptors, and there is good potential for achieving administrative burden reduction by addressing the inefficiencies in the system: While benefits generally outweigh costs, there are still important inefficiencies in the system that lead to unnecessary administrative costs. Through improvements in governance and data sharing, as well as harmonised monitoring, reporting can be reduced, which would result in a lower administrative burden for Member States. Also streamlining monitoring, assessment and reporting at regional level, in line with MSFD requirements, would tackle inefficiencies, and reduce administrative costs.

In terms of coherence, the MSFD is generally coherent with EU environmental policy, although some inconsistencies exist with the WFD and HD. As regards the interplay between MSFD and other relevant sectoral policies, in particular those of the fisheries and maritime sector, there is good potential to improve coherence and ensure a better application of the Ecosystem-Based Approach: There is good potential for closing remaining coherence gaps with the WFD and the HD and establishing closer links with the

Maritime Spatial Planning Directive. There is a need to ensure that MSFD and Blue Economy policies mutually enhance and complement each other, by serving the same sustainability concept (and avoid competing interests), respecting the carrying capacity of EU seas and ocean, which should be at the basis of an effective management of the marine environment and its resources. To this end, greater and consistent cross-sectoral cooperation between different governmental bodies would help deliver on common objectives and work towards ensuring healthy and productive seas and oceans.

In terms of relevance, the MSFD has had clear EU added value, and remains highly relevant to date, but does not fully integrate climate change impacts. The MSFD provides a solid framework, taking an ecosystem-based approach to the management of different activities having an impact on the marine environment and promoting the sustainable use of marine resources.

However, the Directive is not entirely future proof to be able to fulfil this role. It does not fully allow for monitoring and reporting on progress towards GES through for instance a set of high-level targets. Also, it lacks clear procedures and effective and harmonised monitoring and reporting, as well as, hindering effective marine protection. To this end, links with Maritime Spatial Planning could be further strengthened, making the MSFD fully operational. There is a clear need for better integration of climate change impacts in the monitoring and assessment activities under MSFD, as well as in the design and implementation of the programmes of measures.

The presenter summarised the main problem areas identified in the Evaluation, including: (1) the legal framework around directive (objective of GES, difficult to identify how far we are from achieving), (2) insufficient level of implementation and enforcement (complex and burdensome implementation cycle), (3) great disparities across regions and varying levels of ambition of individual Member States within the same region, (4) lack of policy coherence, both with environmental legislation and the wider maritime policy (notably the Common Fisheries Policy and the Maritime Spatial Planning (MSP) Directive, and (5) insufficient and non-harmonised monitoring, limited access to data, heavy and ineffective reporting.

A possible revision of the MSFD should be announced in both the Water Resilience Strategy and the Ocean Pact at the beginning of June 2025. The Commission has already started the preparatory process for the revision. The revision will be aimed at improving the regulatory framework, improving the implementation and data management. The BSAC will be included in the consultations of the MSFD.

**The WG Chair** thanked the representative of DG ENV for her presentation. He underlined the readiness of the BSAC EBM Working Group to contribute to the consultations.

**A representative of anglers** asked about the timeline of the MSFD review. He pointed out that age and size criteria are very poorly incorporated in the management decisions. He looked forward to stakeholder consultations to improve the implementation of the MSFD.

**The representative of DG ENV** replied that a tentative timeline would start with the publication of a Call for Evidence (later this year), and a full Impact Assessment of the options for a future revision of the Directive (Commission proposal planned for 2027).

**A representative of the OIG** appreciated a longer consultation process for the MSFD revision. She underlined that in the meantime the implementation of the current directive should be continued, including the work on establishing the thresholds on seabed integrity (MSFD Descriptor 6).

**The representative of DG ENV** replied that a wide range of stakeholders including the fisheries sector will be included in the consultation process. fisheries part will be included in the consultations. She confirmed that the implementation of the current MSFD will continue, including the work on Descriptor 6, and the work on developing threshold values for different descriptors.

**Another representative of the OIG** asked whether the MSFD evaluation will include the outcomes of the CFP evaluation, in view of the fact that several elements of both legislations are interlinked.

**The representative of DG ENV** underlined that the Commission puts focus on policy coherence, therefore the evaluation of other policies, including the CFP will be taken into account in the review of the MSFD, in order to eliminate any inconsistencies between maritime policies.

**A fisheries representative from Poland** appreciated self-criticism in the assessment of the directive, pointing out the weaknesses of the MSFD in achieving the objectives and the fact that it has been oriented more towards process than outcome. In his view, the identified weaknesses of the directive should lead the Commission to think about alternative ways to reach the goals. In this context, he expressed the view that improving the selectivity should no longer be the objective of certain descriptors of MSFD in the light of scientific findings on the mortality of fish escaping from selective gears.

**The representative of DG ENV** agreed that according to the evaluation the Directive has only been partially effective. However, it has also delivered significant benefits. The Directive sets up a comprehensive framework for protecting EU marine waters and has led to a better understanding of our seas and oceans. The state of marine waters is still deplorable, therefore the overall objective of reaching the good environmental status should remain in place as an overarching objective, but should include more realistic deadlines and interim goals. Targets for monitoring progress towards GES could be considered. She invited the stakeholders to participate in the future consultation process to present their views on a possible future revision of the Directive (once the revision has been announced and the Call for Evidence is published).

**A representative of the OIG** pointed to the insufficiencies in the implementation and enforcement cycle in the evaluation. She asked what challenges have been recognised with relation to the descriptors related to the fish stocks and what should be the way forward.

**The representative of DG ENV** reiterated that this discussion will be held in the context of future stakeholder consultations as part of the Impact Assessment process for a legislative revision of the MSFD.

**The WG Chair** underlined that the BSAC stands ready to contribute to the review of the MSFD. He stated that the Ocean Pact might contribute to reaching a more coherent and simplified legislation as it will seek to align governance frameworks. He pointed out that from the Baltic perspective it is also important to consider the coherence with the Water

Framework Directive in the future review of MSFD as measures implemented on land will help in reaching the goals of the MSFD.

#### **4. Discussion on the HELCOM understanding of the ecosystem-based fisheries management - *draft paper provided by HELCOM***

**The WG Chair** informed that he had participated in a dedicated HELCOM workshop on the ecosystem-based fisheries management (EBFM), held in March 2025 on behalf of the BSAC. The draft HELCOM understanding of EBFM was discussed. The BSAC has been asked to provide comments to the current draft.

**The HELCOM representative** presented the HELCOM structure. She presented the work on developing a HELCOM common understanding on ecosystem-based fisheries management.

She referred to the HELCOM scope of EBFM. The Helsinki Convention sets out the obligation on Contracting Parties to undertake individually or jointly all appropriate legislative, administrative or other relevant measures to promote the ecological restoration of the Baltic Sea Area and the preservation of its ecological balance. The Convention also sets out that the Contracting Parties shall apply the precautionary approach which means to take preventive measures to reduce risk of environmental damage even when there is no conclusive evidence of a causal relationship between inputs or activities and their alleged effects. The Working Group Fish deals with the implementation of the ecosystem approach to fisheries management (EBFM), as required within the context of key EU policies (MSFD; CFP; MSP; EU Biodiversity Strategy).

Background for the common understanding of EBFM was presented:

- There are different interpretations on what the ecosystem approach to fisheries management means in theory and practice.
- Coming to a common understanding of ecosystem-based fisheries management in the context of the HELCOM Fish Working Group would simplify the work of the Group.
- A common understanding can be used to clarify the contribution the Fish Working Group can make towards EBFM in the Baltic and builds the foundation for future endeavours.

The process of drafting the HELCOM understanding of EBFM started in 2023 and the document has since been considered by several sessions of HELCOM WG Fish, a dedicated workshop held on 4 March 2025 and various drafting group sessions. During this summer views and comments are welcomed to the current draft by BSAC members as well as BALTFISH during their upcoming meeting on 25 June 2025. In the autumn 2025 possible drafting group sessions will be organized to further work on the document, based on received comments, and during the one-day informal consultation session of WG Fish on 12 November the document is expected to be recommended for approval on the HELCOM Heads of Delegation level. In early 2026 WG Fish would circulate the document with other subsidiary bodies and other organizations such as BSAC and BALTFISH upon its completion to identify concrete tasks and actions to implement EBFM. She underlined that defining a HELCOM common understanding of EBFM is work in progress, the shared

document is a draft and shared with the intention of engaging in a meaningful interaction and exchange of views with other authorities and stakeholders.

**The WG Chair** thanked the HELCOM representative for presenting the draft document on EBFM and inviting the BSAC to provide comments. As concluded by the HELCOM workshop in March, fishers would be an important stakeholder group to engage in a further step when developing the EBFM common understanding and engaging through BSAC was seen as an important channel for this engagement.

**A fisheries representative from Poland** referred to the structure of HELCOM and asked to what extent is HELCOM a policy organisation and how much it is based on science? He asked if the comments by the BSAC members will be taken into account in the final HELCOM document.

**The HELCOM representative** replied that that HELCOM is a policy organisation, that utilises with scientific input as important background for policy making. Input from the BSAC to the EBFM document will be considered along the process.

**A representative of the OIG** informed that several comments to the draft had already been submitted at the workshop. She noted that fisheries representatives had been duly missed at the workshop. Therefore, their input to the draft is important. She also proposed to add the CFP definition of the EBFM to the HELCOM draft.

**A representative of the OIG** asked to include a reference to the recreational value of the ecosystem, in the context of subsistence fishing.

**The HELCOM representative** took note of the proposed amendments to the draft. She informed that the drafting group meetings will possibly take place in early autumn 2025 to further work on the document and highlighted that the drafting group sessions as well as HELCOM Working Group sessions are also open to HELCOM observers and that during the one-day informal consultation session of WG Fish on 12th November 2025 the document is expected to be recommended for approval on the HELCOM Heads of Delegation level.

**The HELCOM representative** informed that the HELCOM's input on seals as requested by the BSAC will be delivered to the BSAC, as recommended by HELCOM IC WG BIODIV 5-2025..

**The WG Chair** asked the WG to provide comments on the HELCOM draft document until Friday, 30<sup>th</sup> May. The BSAC Secretariat will draft a consolidated response to the document by the end June.

**The Working Group** agreed.

## 5. Discussion on the BSAC recommendation on the EBFM

*Discussion on the EBM is part of the BSAC work programme for 2025-26.*

**The WG Chair** referred to the draft BSAC advice on implementation of the ecosystem-based fisheries management (EBFM) in the Baltic, drafted before the meeting by the Chair and the Secretariat. He underlined the need to draft such advice to clarify what is needed to implement the EBFM. He asked the BSAC members to discuss the draft advice to gather first comments. The draft will then be sent to the ExCom for further comments.

He pointed to the fact that the background of the advice refers to the fragility and uniqueness of the Baltic ecosystem, and includes references to the BSAC White Paper published in 2022.

The participants discussed the introductory part of the draft BSAC advice.

**A representative of the OIG** stated that the introductory part of the BSAC advice could highlight that the deadlines set in legally binding policy documents have not been met. She underlined that the situation in the Baltic would be better if the objectives and deadlines were achieved.

**Another representative of the OIG** proposed to mention MSFD as the overarching directive.

**A representative of anglers** stated that the White Paper is a solid background for the BSAC advice on EBFM. His organisation will submit comments to the document. He underlined that the implementation of the EBFM requires adaptive and progressive decision-making processes.

**A representative of the OIG** proposed to add reference to the study on EBFM published in 2022 by the European Commission<sup>4</sup>, which sought to provide a clear state-of-play of the implementation of EAFM in order to achieve policy objectives beyond the target species in specific EU marine areas.

**A fisheries representative from Poland** stated that in his view it should be clearly mentioned that fishers are also part of the ecosystem.

**Another representative of the OIG** proposed to mention that ecosystem-based management has been discussed for over 10 years and there is no progress in its implementation. The BSAC should make a strong call to the decision-makers to implement the EBFM.

**A fisheries representative from Denmark** stated that the BSAC advice on EBFM should also highlight shared management with Norway. She applauded the sentence stating that fishing is just one of the factors that are having an influence on the stocks.

The participants discussed the recommendations.

**Some representatives of the OIG** mentioned the need to include precautionary approach in the EBFM advice. They also asked for more pro-active language in the advice and for concrete actions under the sentence referring to the need to revise the Baltic MAP. They proposed some amendments and clarifications to the text.

**A small-scale fisheries representative** proposed to use a uniform term, either ecosystem-based approach to fisheries or ecosystem-based fisheries management throughout the text, as both terms differ in meaning. With reference to the Baltic MAP, some suggestions from the advice such as integrating environmental factors and interactions in fisheries management have already been put in place and could be deleted from the text. In his view, the ICES should be asked to provide a more detailed advice on non-quota species to have a full picture of the stocks needed for EBFM. He asked to delete the reference to regime shift in the Baltic as there is no scientific consensus on this.

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<sup>4</sup> [The implementation of ecosystem-based approaches applied to fisheries management under the CFP - European Commission](#)

**A fisheries representative from Poland** proposed to add that the knowledge from the fishers is essential in fisheries management.

With respect to the sentence on the Baltic MAP, **a fisheries representative from Denmark** expressed the opinion that it should be stated that the MAP has not been very productive in implementing EBM rather than counterproductive, and should include a reference to the knowledge gaps related to EBFM that hinder its implementation.

**A representative of recreational fishers from Denmark** asked to include a mention of invasive species in the section on multispecies management.

**A representative of the OIG** referred to the need for advanced scientific advice, to ensure that the development and implementation of Ecological Reference Points (ERPs), such as the “F<sub>eco</sub>” approach are included in the ICES advice. In this context she referred to the PelAC recommendation on EBFM<sup>5</sup>.

With reference to the point on climate change, the participants proposed some amendments. They called for including reference to Energy Transition Partnerships, as well HELCOM’s statement on climate change, adding “protecting” to the sentence on restoring the fish populations and habitats.

**A fisheries representative from Denmark** pointed to the need to focus on fisheries management in the EBFM recommendation. Other legislations such as the Nature Restoration Law could be referred to.

**A representative of the OIG** expressed the view that such silos approach has led to the present situation. There is a need to have a more holistic approach to fisheries management, including the environmental perspective.

**A fisheries representative from Poland** argued with references to the legislations that has not been productive. In his opinion, there is a need for more innovative approach.

**The WG Chair** reminded the participants that in the CFP recommendation published in November 2024 the BSAC had agreed that the BSAC comments formulated in 2022 in the White Paper are still valid. In this context the White paper had been the basis of the draft EBFM recommendation.

**A representative of the OIG** underlined the need to take measures on land to ensure a holistic approach to EBFM. **Another representative of the OIG** expressed the opinion that the implementation of EBFM deserves increased funding (from EMFAF).

**The WG Chair** asked to submit amendments on the draft EBFM recommendations, in written form to the Secretariat, before the next ExCom meeting in June. He proposed to discuss the revised draft version at the next EBM Working Group meeting in the autumn.

**The Working Group agreed.**

## 6. AOB

**The WG Chair** informed about the HELCOM FISH M meeting on 27<sup>th</sup> May online to discuss the draft HELCOM recommendation on salmon. The new draft is published on the

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<sup>5</sup> Pelagic Advisory Council: Recommendation on the implementation of the ecosystem-based approach to fisheries management (EAFM) in pelagic fisheries [2223PAC02-PelAC-recommendation-on-the-ecosystem-based-approach-to-fisheries-management.pdf](#)

HELCOM website. The representatives of the EAA and the Baltic Salmon Fund, members of the BSAC will attend the meeting.

**A small-scale fisheries representative** proposed to discuss a possible review of the BSAC position on Baltic Multiannual Plan at one of the next meetings of BSAC Working Groups. The purpose of this discussion would be for the BSAC to come with concrete proposals for amendments to the MAP.

**The WG Chair** stated that a recommendation on the revision of the Baltic MAP could be a horizontal topic to be dealt with by all BSAC Working Groups.

**The Working Group** agreed that a BSAC recommendations on the Baltic MAP could be reviewed by all BSAC Working groups.

**The WG Chair** thanked all participants for good discussions.