

Ref: BSAC 2025-26/19

Copenhagen, 5th February 2026

Input to the functioning of Advisory Councils for informing the Commission's Code of Conduct/Guidance for Advisory Councils

Danish Fishers PO

Rather than suggesting changes to the functioning of the ACs, DFPO would like to point to things that work well and should not be changed:

- The 60/40 split should be maintained as it represents a fair reflexion of the fact that some of the members are directly affected by the CFP and others are concerned, but not immediately affected.
- Small scale fishers are well represented in the existing structure and can present issues that are mainly affecting them (to the extent that such issues can be identified) in the regional Councils. It is difficult to see what issues would only affect small scale fishers and therefore discussions should not be taken in fora with specific interests. Further; organisations that represent the fishing fleets in most of the countries have a mixture of small and large scale fishers as members, so small scale fishers are by no means only represented by alleged dedicated small scale representatives. As a matter of fact, in many countries more small scale fishers are members of the large national organisations, than of alleged dedicated SSFs.
- The work in the ACs benefits immensely when representatives from COM are physically present, enabling in-depth discussions. This should be given high priority in the future.

Swedish Pelagic PO and Swedish Fishermen PO:

- 60/40 composition should be kept
- Scientists should be invited to talk about relevant topics as an important part of the AC work
- AC:s should strive for consensus advice. Advice composed of majority/minority positions is not very helpful. All members must realise that the AC cannot mirror and include every member's specific viewpoints and comments in every document in the name of finding a consensus position. Members should also come to meetings without locked positions that cannot be discussed.
- Attendance in-person is sometimes low. Could be amended by having certain meetings in-person only (PeIAC for example has 2 in-person meetings and 2 digital (not hybrid) meetings per year).

- Some members have influence over multiple votes in BSAC by being both members themselves and through one or more umbrella organisations. This poses a problem with the credibility of the AC and AC positions since a single member in this way can have an exaggerated influence on AC positions, advice, discussions etc.

European Fishmeal and Fish Oil Producers EFFOP:

- EFFOP proposes that it should be specified that advisory councils are composed of representatives from the blue value chain. In this way, primary fishers, processing industries (for both human and non-human consumption), aquaculture, etc. are included. If only fishers and aquaculture are mentioned, processing companies, which are the link to consumers, are excluded. Referring to the blue value chain is therefore more encompassing.
- Regarding the question of integrating scientists and academics, EFFOP recommends that they should continue to be observers in the BSAC and provide apolitical and neutral scientific input, rather than becoming full members. We will follow scientific advice, but scientists should remain neutral and apolitical. Including them as full members of the BSAC poses a significant risk of politicising scientific advice and could undermine the perceived objectivity and scientific integrity of their recommendations

LIFE and Fischereischutzverband (Association of Fisheries Protection)

General comments

At present, the Advisory Councils lack inclusivity, persuasiveness, and effectiveness, in contributing to sustainable fisheries, value chains, healthy aquatic ecosystems and maritime affairs management. Despite significant investment from public funds recommendations from ACs are rarely implemented at the EU level.

- Stakeholder consultation and engagement in policymaking can be improved. See - Better Regulation initiative.
- Clarify cases where the COM must consult the ACs

Membership and composition

- The application of Article 4(7) of Delegated Regulation (EU) 2015/242, as amended by Delegated Regulation (EU) 2022/204 has proved challenging. The legislation states “the number of representatives of small-scale fleets should reflect the share of small-scale fleets within the fishing sector of the Member States concerned.” However, dedicated small-scale representatives are still particularly poorly represented on the majority of advisory councils as both members and in leadership positions.

- Establishment of a SSF AC would better allow for their Delegated Act to be successfully implemented
- ACs are characterised by having an unbalanced representation amongst the membership. In the industry there are a lack of members from the small-scale fishing sector and the OIG group is persistently lacking members.
- Acknowledging that some AC members have their membership fees and working time funded through the EMFAF regulation, removing membership fees for small-scale fishery representatives and underrepresented interests would help to improve access and provide a more level playing field.
- Working conditions would be improved within the ACs by setting up a whistle blower mechanism or conflict resolution mechanisms assigned to a contact person within the Commission to guarantee a positive working environment for all participants in all ACs. As the principal funder and advice requester of the ACs it is incumbent on the Commission to ensure proper functioning.

Current Challenge: ACs are not fully trusted or utilized by all stakeholders, limiting their influence on EU fisheries policies.

Recommendation: Enhance transparency and accountability of the Advisory Councils: Conduct annual public fora to discuss AC activities and their impact, building trust among stakeholders.

Current challenge: utilisation and participation within the scientific advice process

Recommendation: Integrate Scientists and Academics into ACs. Allow scientists and scientific bodies full membership within the OIG group. Their expertise is essential for grounding recommendations in the latest scientific research and ensuring evidence-based decision-making.

Baltic Salmon Fund

From us, the Baltic Salmon Fund, we would of course like to see everyone equal in our AC. Fishing currently has 60% and environmental organisations have 40%. Our organisation represents fishing rights owners in the rivers and estuaries. I don't know where we fit into this distribution. It would be reasonable if we all had an equal say.

WWF

- In our view, the working conditions and cooperation within BSAC have improved significantly in recent years. The recent challenges are mainly related to the contribution of the Executive Secretary and, eventually, the lack of an Executive Secretary. In our view, the working atmosphere and cooperation are influenced above all by the members' personal commitment and willingness to work together

towards shared objectives. It is precisely in this respect that significant progress has been made within BSAC.

- As an internal area for development in all the ACs, including in BSAC, would be an obligation for a chair person to ALWAYS remind the participants at the very beginning of the meeting (during the welcoming part) of the rules, such as the need for respecting each other, that every view is valid and that the AC is a safe space. That would encourage meaningful discussion and an atmosphere of trust.
- As a factor independent of BSAC, we would also like to highlight that we would hope for more active participation by the Member States in BSAC meetings. It would be important for the authorities of the Member States to be aware of the discussions taking place within BSAC and, where necessary, to be able to explain the positions and reasoning of the Member State they represent on the matters under consideration. In addition, it would be desirable for representatives of the European Commission to attend at least some of the meetings in person.

Coalition Clean Baltic

General comments and observations by CCB:

Coalition Clean Baltic (CCB) and many other e-NGOs have actively participated since the BSAC was created in 2016. We have spent many hours actively attending meetings and contributed to numerous AC positions and recommendations. We have worked constructively with industry and other stakeholder representatives to reach compromises where possible, and where consensus could not be reached, we have laid out clear, science-based evidence to support our positions. We have always valued the purpose of the BSACs in fostering constructive dialogue, developing consensus solutions among different stakeholders and promoting sustainable fisheries management in the Baltic - and we continue to value the role of the BSAC in doing this.

Below we suggest general measures that could improve the functioning of all ACs and also come with specific input to how the BSAC could become even better.

General suggestions with regards to all ACs:

1. More balanced representation of all AC members' views at external meetings or processes.

When ACs are invited to contribute to broader meetings and processes, always ensure that invitations extend to both the sector and OIGs. If that is not possible, ensure that statements and input are clearly agreed upon among all stakeholder groups in the AC well in advance of the external meeting. If this isn't possible, views of OIG must be properly reflected, presented and respected even when OIGs are not able to attend.

2. Reaching a better balance among Industry and OIG in Executive Committees

The 60/40 division of the ACs in Executive Committees is a root issue in terms of participation, not only from ENGOs, but also from other users of our common fish resources. Thus, we propose a series of solutions - non-mutually exclusive - that could resolve this issue:

- A 50%-50% membership split;
- A 30% cap on fleet segment representation;
- "balanced" votes, so that regardless of the number of organisations voting on each category, the total votes from each one amount to 50%.

3. Unbiased representatives (Chair and Secretariat) of the ACs

The establishment of "Management Teams" in several ACs, where members from the OIG have a seat/seats, allows for a more balanced management and representation and provides a more plural framework for the secretariats to operate.

4. Reaching consensus and openly and clearly accepting discord.

- When it is not possible to reach consensus solutions/advice/proposals, minority positions have to be clearly outlined - they cannot be reduced to just an almost invisible footnotes. Different positions must be easily readable and understandable. They should be included in the text as specific paragraphs within the body of the advice, presented right after the majority position, and a mention to the existence of a minority position should be included in the cover e-mail or letter.
- More must be done to foster and accept of difference of positions and that all positions have a "right" to be there, even if they are not shared by the majority.
- Guidelines and/or template to present minority positions could be provided to ACs by DG Mare.

5. Respectful and professional atmosphere and behaviour in all meetings

- Develop rules of conduct, including establishing "whistle-blowing" mechanisms applicable to all ACs.
- There must be zero tolerance for bullying and/or disrespectful behaviour. Consider a workshop with a moderator to work together with all members to define what constitutes bullying and disrespectful behaviour, as there are generally different views on what qualifies as such behaviour. At the workshop, members can also learn how to deal with situations where discussions become too heated or if anyone acts in a disrespectful or bullying manner.

Suggestions for the BSAC

Executive Committee Meetings

Generally, the meeting agenda is too packed, which allows too little time for discussions, reflections, and respectful dialogue. Therefore, ensure that if the ExCom is to vote on a policy document, either:

- There is plenty of time in the agenda for respectful and constructive dialogue. It is the chair's responsibility to plan for this and to ensure a respectful tone and constructive dialogue.
- Or, all content discussions happen only at the working group/focus group level. Once there is full consensus at WG/focus group level, the position is then sent for input and voting in writing only to the ExCom members. It must then be the role of the chair of the WG/FG to find consensus language that ExCom members can accept. Alternatively, present majority/minority positions in a way that fully represents all views of both the different industry positions and the different OIGs.

Management Team Transparency

Increase transparency of decisions and discussions that happen at the management team:

- Share agenda and notes of the meeting with the ExCom
- Invite ExCom members to provide input to the management team discussions

Member State Participation

Actively continue to encourage and invite member state representatives, the Baltfish chair, and the council presidency to participate in BSAC meetings.

External Meeting Representation

Increase transparency regarding which external meetings the chair, vice chairs, and WG chairs are attending on behalf of BSAC, well before the meeting. Actively ensure that BSAC members are consulted about prioritisation of those meetings and that members can provide input to the presentations and speeches well before the external meeting.

Social Events and networking opportunities foster better relationships

Social Events and networking opportunities foster better relationships. Continue with joint dinners and lunches among BSAC members—these foster better relations and understanding among members.

More Joint Meetings

Actively seek opportunities for further joint meetings with Baltfish, EFCA, DG MARE, DG ENV, EEA, ICES and HELCOM, and joint dinners when this is possible logistically/financially.