

**Ms Charlina Vitcheva**  
**Directorate-General for Maritime Affairs and Fisheries**  
**European Commission**  
**Rue Joseph II, 99B-1000**  
**Brussels, Belgium**

Ref: BSAC 2025-26/14

Copenhagen, 13<sup>th</sup> January 2026

**Subject: Proposal for a new Advisory Council dedicated to Small-Scale Fisheries, as referred to in the Communication on the European Ocean Pact**

Dear Ms Charlina Vitcheva,

The Baltic Sea Advisory Council (BSAC) welcomes the Communication on the European Ocean Pact and acknowledges that the Communication states “The Commission will also consider the establishment of a dedicated Advisory Council” as part of the European Union’s prioritised support for small scale fisheries. .

The BSAC understands that this is a possibility which the Commission is still exploring and which would – probably - require a legal proposal to amend the relevant provisions of the Regulation on the Common Fisheries Policy.

The BSAC is aware that 5 of the 11 Advisory Councils addressed a letter to you on 10 September 2025 in which they advocated against the creation of a dedicated advisory Council for the reasons set out therein. The proposed letter was discussed within BSAC and our Executive Committee (ExCom) elected to abstain from providing support. At our most recent ExCom meeting on 13 November 2025 the subject of the establishment of a small-scale fisheries advisory council was discussed again and the issue will be revisited in the new year.

The BSAC sees this support for small-scale fisheries as also reflecting what the Commission has already begun when changing the rules for the structure of advisory councils, notably in Delegated Regulation (EU) 2017/242 as amended by Delegated Regulation 2022/204. These amendments imply that advisory council must ensure a proper balanced representation of stakeholders, including small-scale fisheries, within the seats allocated to the fisheries sector. The BSAC also notes that the said delegated Regulations neither define small-scale fisheries nor offer guidance as to how the advisory council are to meet the goal of well-balanced representation of fisheries stakeholders. fisheries. The BSAC is also reflecting on this relevant issue.

The BSAC recognizes and supports the importance of well-balanced stakeholder representation, and we warmly welcome and associate small-scale fisheries as members.

We have also put in place certain measures to facilitate their participation.

An initial discussion within the BSAC of the idea of a possible new Advisory Council dedicated to small-scale fisheries has shown that many members representing only small-

scale fishers and other interest groups find much merit in the idea of a dedicated advisory council, whereas fisheries organizations with a mixed membership (both small-scale and large scale) are more skeptical. The BSAC, therefore, at present, reserves its position on a possible legal proposal from the European Commission and is looking forward to developing its views and offer advice during the usual preparatory phases of a possible proposal.

On behalf of the Baltic Sea Advisory Council Members,

Sincerely yours,



Jarek Zieliński

BSAC Executive Committee Chair