

BSAC response to the communication from the Commission to the European Parliament and the Council "Sustainable fishing in the EU: state of play and orientations for 2027"

Ref: BSAC/2026-2027/07

DATE: 31 August 2026

INTRODUCTION

The BSAC hereby provides its comments on the Commission Communication 'Sustainable fishing in the EU: state of play and orientations for 2027' and the accompanying Staff Working Document.¹

Comments by chapter:

Progress in achieving maximum sustainable yield

Orientations for 2027 fishing opportunities

The BSAC takes note of the Commission's assessment of the state of play and its orientations for 2027. The accompanying Staff Working Document refers to BSAC recommendations on fishing opportunities and the implementation of an ecosystem-based approach to fisheries management and highlights the cooperation between the BSAC and BALTFISH.

The BSAC also notes that the Commission adopted its proposal for the 2027 Baltic Sea fishing opportunities on 24 August 2026. It would welcome due consideration of its adopted recommendations on fishing opportunities for 2027, together with the minority positions recorded therein, during the forthcoming Council deliberations. In line with Article 44(3) of Regulation (EU) No 1380/2013, the BSAC would appreciate timely feedback from the Commission, where possible on a stock-by-stock basis, explaining how its advice has been taken into account and, where the proposed or final measures differ from the recommendations, the reasons for that divergence.

The BSAC acknowledges the continued reduction in fishing pressure reported at EU level. However, developments in fishing mortality, biomass and recruitment are not uniform across sea basins or individual stocks. A comprehensive assessment of stock status should therefore draw on the available stock-specific indicators, including fishing mortality, biomass and recruitment, as well as, where scientifically appropriate, demographic characteristics and relevant ecosystem conditions. Significant concerns remain regarding a number of Baltic stocks, while recent developments for certain herring and sprat stocks underline the importance of assessing the condition and prospects of each stock individually. In the Baltic Sea, many stocks remain under severe pressure due to factors beyond fisheries management alone. Environmental degradation, including eutrophication, habitat loss, pollution, and climate-related changes, has contributed to ecosystem dysfunction and declining biodiversity. **The BSAC** therefore agrees that Baltic fisheries management must establish a clear and credible pathway towards stock recovery. Rebuilding fish stocks is essential not only for restoring ecosystem health and resilience but also for improving the long-term socio-economic viability of the fishing sector and reducing the substantial year-to-year fluctuations that undermine business stability and coastal communities.

¹ [Sustainable fishing in the EU: state of play and orientations for 2027](#)

The Communication refers to the joint statement by the Commission and eight Baltic Member States on the urgent need for rebuilding fisheries in the Baltic Sea.² The statement recognised the need for ICES to provide stock-specific catch scenarios for rebuilding the stocks concerned to the required biomass levels within different timeframes. **The BSAC** welcomes the Commission's early engagement in developing the related ICES requests and recalls its recommendation of 26 June 2026 on the creation of a Rebuilding Framework for Baltic Sea stocks.³ Rebuilding trajectories should be stock-specific and time-bound; reflect the biological characteristics and demographic structure of each stock; assess alternative catch and management scenarios; consider environmental pressures, food-web interactions and mixed-fisheries constraints where the science allows; and include transparent review points and scientific evaluation of the measures applied. The BSAC would also welcome publication of the final requests submitted to ICES, together with information on the stocks covered and the timetable for delivery of the resulting advice.

The BSAC asks the Commission and Council to ensure that remedial measures and rebuilding pathways for stocks below relevant biological reference points are transparent, scientifically evaluated and consistent with the CFP and the Baltic Multiannual Plan.

The BSAC refers to its recommendations for the fishery in the Baltic Sea in 2027, finalised by the Executive Committee on 25 June 2026 and published on 28 August 2026. Where consensus could not be reached, those recommendations present minority positions transparently and identify the organisations supporting them.⁴

Reduced fishing mortality has not resulted in sustained biomass recovery for several depleted Baltic stocks, although developments differ between stocks. This calls for a dual-track response: fisheries measures consistent with the best available scientific advice, the CFP and the Baltic Multiannual Plan, combined with measurable implementation of environmental legislation addressing eutrophication, pollution, habitat degradation, climate-related change and other ecosystem pressures. Action on wider ecosystem pressures should complement, and not detract from, the timely implementation of fisheries measures required under the applicable legal framework. Equally, fisheries restrictions cannot substitute for effective action on pressures generated by other sectors.

The BSAC agrees that the focus must remain on the overall ecosystem while also recognising other factors that affect fish stocks.

The Baltic Sea is a shallow and semi-enclosed brackish sea that is highly vulnerable to natural and human-induced changes. Fishing is one of several interacting pressures, whose relative importance differs between stocks, geographical areas and periods.

Fisheries management should be capable of responding to material changes in the ecosystem and fish populations through a precautionary, adaptive and timely decision-making process at regional level. New information concerning natural mortality, recruitment, distribution, age and size structure, stock mixing, habitat availability and food-web dynamics should be assessed without unnecessary delay and, where appropriate, incorporated into scientific advice and management decisions. Ecosystem-based fisheries management should also contribute to achieving Good Environmental

²Council of the European Union, Joint Statement by the Commission and eight Baltic Member States on the urgent need for rebuilding fisheries in the Baltic Sea, ST 14734/25 ADD 1 REV 1, 24 November 2025, p. 5. [link](#)

³ BSAC, "Advice on the creation of a Rebuilding Framework for Baltic Sea stocks", Ref. BSAC 2026–2027/04, 26 June 2026. [Link](#)

⁴ BSAC recommendations for the fishery in the Baltic Sea in 2027, Ref. BSAC/2026-2027/06. [Link](#)

Status under the Marine Strategy Framework Directive, including in relation to commercial fish populations, marine food webs and seabed integrity.⁵⁶⁷⁸

For the Baltic Sea region, strengthened regional coordination, clear operational targets and improved cross-sectoral governance are essential. Consultation should begin sufficiently early to influence the development of options, follow a predictable annual timetable and include traceable feedback from the Commission and BALTFISH explaining how BSAC advice has been considered.

The BSAC agrees that in the Baltic Sea context restoring productive marine ecosystems and ensuring the long-term sustainability of fisheries are necessary. The BSAC emphasises that restoration and fisheries objectives are closely interconnected and go hand in hand. Restoration supports healthier and more productive fisheries and reduces the risk of future stock decline. Fishers, together with other on-the-ground stakeholders, should be considered as key actors in restoration. Their local ecological knowledge, practical experience and involvement in monitoring are essential for effective implementation.

The BSAC refers first and foremost to its recommendations on cormorants and seals, adopted on 29 November 2024,⁹¹⁰ which were subsequently complemented by the consensus NSAC/BSAC advice on the management of predators, approved on 30 April 2026.¹¹ Healthy and resilient fish stocks are the foundation for resolving predator-related conflicts. Monitoring of predator populations and fish stocks should be strengthened, and predator-induced mortality should be better incorporated into natural-mortality estimates and relevant stock assessments where data and models allow. Alternative conflict-mitigation strategies, including non-lethal methods, should be assessed before lethal control is considered. Where scientific evidence demonstrates significant local effects on a vulnerable fish stock or documented fisheries impacts, geographically targeted measures may be considered in accordance with applicable nature legislation and should be accompanied by scientific monitoring of their effectiveness.

The BSAC members have been highlighting the need for improving the scientific advice that informs fisheries management and the setting of fishing limits. The BSAC emphasizes that addressing these challenges requires stronger collaboration between scientists, NGOs, and the fishing industry to ensure transparent reporting, effective enforcement, and shared solutions. The BSAC has therefore increasingly focused its work on bridging the gap between science, policy, and implementation. Key areas of engagement included improving the usability and clarity of scientific advice, addressing major knowledge gaps such as species interactions, and contributing to the development of ecosystem-based fisheries management approaches. The establishment and work of the Science Focus Group reflect this strategic shift.

⁵ BSAC advice on implementation of Ecosystem-Based Approach to Fisheries Management in the Baltic Sea [link](#)

⁶ COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS EU Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries (COM/2023/102 final) [EUR-Lex - 52023DC0102 - EN - EUR-Lex](#)

⁷ [EUR-Lex - 52025DC0281 - EN - EUR-Lex](#)

⁸ BSAC statement on the Ocean Pact [link](#)

⁹ BSAC recommendations on seals, 29 November 2024 <https://www.bsac.dk/wp-content/uploads/2024/12/BSACrecomendation-on-seals.pdf>

¹⁰ BSAC recommendations on cormorants, 29 November 2024 <https://www.bsac.dk/wp-content/uploads/2024/12/BSACrecomendation-on-cormorants.pdf>

¹¹ 08-2526-NSAC-BSAC-advice-on-management-of-predators: <https://www.bsac.dk/wp-content/uploads/2026/05/08-2526-NSAC-BSAC-advice-on-management-of-predators.pdf>

The Fischereischutzverband Schleswig-Holstein considers that uncertainties associated with possible differences between total catches and recorded landings should be taken into account when interpreting stock assessments and MSY-based management advice.

Socio-economic outlook

The BSAC notes that the Communication appropriately acknowledges the significant efforts and sacrifices made by fishers over recent decades, which have contributed to substantial reductions in fishing mortality and to improved fisheries management outcomes across all European sea basins. These achievements demonstrate the sector's commitment to sustainable fisheries and responsible resource management.

The BSAC notes that landings of a number of Baltic stocks remain historically low and continue to affect parts of the sector and fishing-dependent communities. At the same time, the improved aggregate economic indicators reported by the Commission for the Baltic fleet in 2023 should be acknowledged. Basin-wide averages may conceal divergent outcomes between Member States, fleet segments, active and passive gears, target fisheries, ports and communities. The BSAC encourages the Commission to consider accompanying rebuilding scenarios and significant management options with socio-economic analysis that, where possible, identifies the impacts on different fleet segments, fisheries and coastal communities.

The BSAC underscores that the socio-economic consequences of declining fish stocks, including employment losses and threats to traditional livelihoods, must be acknowledged. Healthy and resilient fish stocks are the foundation for the long-term environmental, economic and social viability of the fisheries sector. Socio-economic evidence should inform management choices within the applicable scientific and legal framework, while respecting the conservation obligations established under the CFP. Consistent, transparent and evidence-based implementation of that framework is important both for stock recovery and for providing the predictability needed by the fishing sector and coastal communities. Achieving Good Environmental Status also requires concrete and enforceable measures across all sectors affecting the Baltic marine environment.¹²

Balance between the fishing capacity of the Member States' fleets and their fishing opportunities

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 published its recommendations on energy transition in October 2023. To discuss the input to the Advisory Councils' recommendations, the BSAC has reactivated its Energy Transition Focus Group in 2025. The BSAC called on the Commission to look more closely at the capacity rules and their impact on the energy transition, especially the definition and calculation of capacity¹³. There is a need for a more substantial reflection on socio-economic aspects and the future of fisheries and food production.

The BSAC considers it important to maintain an appropriate balance between fleet capacity and available fishing opportunities. At the same time, capacity rules should not unnecessarily restrict vessel modifications required for safety, improved working conditions, energy efficiency or the transition to low-carbon propulsion. **The BSAC** therefore encourages the Commission to examine further how gross tonnage and engine power are defined and calculated in relation to such technologies.¹⁴ Any adjustment should be accompanied by appropriate safeguards to avoid unintended increases in effective fishing power or fishing pressure. This is particularly relevant

¹² BSAC statement on the Vision 2040 [link](#)

¹³ [AC-recommendations-ETP_BSAC-final-input_sent-to-COM.pdf](#)

¹⁴ [AC-recommendations-ETP_BSAC-final-input_sent-to-COM.pdf](#)

because technological developments may increase a vessel's catching efficiency even where its registered gross tonnage and engine power remain unchanged.¹⁵

The BSAC welcomes the Commission's recognition that current trends 'highlight the importance of stock conservation and of accelerating the energy transition in the EU fishing fleets'. Rebuilding healthy and abundant fish populations should be treated as an integral part of the fleet's decarbonisation pathway because improved stock availability can reduce searching time, fishing effort, fuel use and operating costs.

As a general consideration, any energy transition effort must be based on a viable outlook for fishery businesses to plan investments, adhere to future legislation and improve ecosystem health. The Baltic is particularly vulnerable to environmental changes contributing to a dramatic decline in some commercial fish stocks. This situation requires a special approach, also in terms of energy transition, as the majority of vessels fishing in the Baltic are small-scale vessels that are restricted to Baltic fish stocks and spread over a multitude of small harbours with limited infrastructure. A modernisation of the fleet can give fishers the chance to diversify their income based on local opportunities to fish for new species, use new gear or pursue non-fishing activities like guided tours and crew transport. This may enable economic stability and support a return on investment. Fluctuations in the fishing opportunities alone cannot compensate the investments made in modernisation. Thus, special regard must be given to Baltic-locked fisheries in the Baltic. Together with the small-scale fleet, the larger fleet segments also face a disadvantage in the Baltic compared to other basins: being at the end of the maritime transport chain¹⁶.

The BSAC agrees on the need to improve the socio-economic situation of fishers by supporting a profitable sector capable of investing in fleet modernisation and the wider transition towards decarbonisation. This, in turn, would help improve the attractiveness of the sector to new generations.

Landing obligation

As stated in the BSAC response to the Commission's survey to inform the second report on the implementation of the Multiannual Plan for the Baltic Sea¹⁷, the BSAC is of the opinion that the implementation of the landing obligation (LO) has not been fully successful. New gears have been developed for the active gear fleet targeting flatfish and an evaluation of their effectiveness in reducing cod bycatch would facilitate the potential for this gear to be exported to other regions. Furthermore, novel control techniques such as PIT-tags and eDNA sampling have the potential to utilise cost-effective non-invasive techniques that would provide greater certainty regarding controls. BSAC has hosted researchers from regional scientific institutes and BSAC members have participated in trials aimed at furthering the applicability of these technological solutions.

Effective implementation requires a combination of improved selectivity, workable technical rules, reliable catch documentation and proportionate control. Remote Electronic Monitoring, including CCTV, can support enforcement in fleets identified as presenting a high risk of non-compliance. Its implementation should be effective, proportionate, adequately financed and consistent with data-protection requirements.

The Fischereischutzverband Schleswig-Holstein considers that greater priority should be given to improving gear selectivity and reducing unwanted catches at source. It also considers that additional

¹⁵ Bastardie F, Wakeford RC, Torreele E, Aranda M, Doering R, Ligas A, Mele I, Castresana J, Gabiña G, Maes SM, Sabatella R and Malvarosa L (2026) How to ensure sustainable fisheries while renewing the EU fishing fleet for modernization and energy transition?. *Front. Mar. Sci.* 13:1812898. doi: 10.3389/fmars.2026.1812898

¹⁶ [AC-recommendations-ETP_BSAC-final-input_sent-to-COM.pdf](#)

¹⁷ [BSAC-answer-COM-quest-MAP-report2024-2025-1.pdf](#)

landing-stage weighing requirements should be assessed in terms of their proportionality, cost and contribution to addressing mortality and catch losses occurring at sea.

Implementation at sea basin level: Control and enforcement by Member States

The BSAC recognises the importance of effective control, compliance and traceability in ensuring sustainable fisheries management. However, it is essential that any future requirements for electronic monitoring, including remote electronic monitoring (REM) systems, are implemented in a proportionate and risk-based manner. Support should be given to those parts of the fleet that are unable to finance the measures or requirements that are being implemented.

The Commission Staff Working Document identifies serious shortcomings in catch registration, weighing and control in parts of the Baltic. Representatives of the environmental NGOs BalticWaters, Coalition Clean Baltic, Baltic Salmon Fund and WWF additionally refer to ICES observations concerning species misreporting between herring and sprat and call for strengthened control, onboard monitoring, representative sampling and species-verification procedures. Their further concern regarding reporting of sprat as non-quota species such as flounder remains explicitly attributed to the named NGO members.¹⁸

The BSAC notes that implementation of the revised Control Regulation raises practical questions concerning proportionality, financing, data protection, harmonisation and the interaction between new technical requirements and fishing operations.

In 2025–2026, the BSAC participated in exchanges with Commission control experts, EFCA and the BALTIFISH Control Expert Group concerning implementation of the revised Control Regulation and the need for improved stakeholder consultation. Electronic monitoring and observer coverage in appropriate fleet segments can support more reliable data and more effective enforcement of the landing obligation. The BSAC looks forward to further research and testing of eDNA and PIT-tag applications.

On 16 July 2026, the BSAC participated in a multi-Advisory Council control workshop following the workshop held in February 2025. The BSAC requests early and structured consultation on the implementing and delegated measures required under the revised Control Regulation. Particular attention is needed to harmonised high-risk criteria, REM scope and financing, data protection, margin-of-tolerance rules, weighing and representative sampling, electronic logbooks, serious-infringement rules and consistent implementation across Member States.

CONCLUSIONS

The BSAC supports the objective of rebuilding Baltic fish stocks and securing environmentally, economically and socially sustainable fisheries. Achieving this objective requires transparent stock-specific rebuilding trajectories, fisheries measures consistent with the best available scientific advice and the applicable legal framework, effective action on wider ecosystem pressures, and restoration of essential fish habitats. **The BSAC** encourages the Commission to accompany major management scenarios with detailed socio-economic analysis and to support proportionate and harmonised implementation of the revised Control Regulation across Member States.

The CFP alone cannot deliver all the environmental improvements required to restore marine ecosystems. An integrated approach aimed at enhancing synergies between fisheries and environmental policies is needed. There is an urgent need to establish a governance framework to resolve user conflicts and to enable region-specific solutions.

¹⁸ [Joint NGO recommendations on Baltic Sea fishing opportunities for 2027](#)

With regard to the uniqueness and fragility of the Baltic Sea, any marine measures, including efforts addressing pollution, must go hand in hand with efforts on land. This points to the need to include agricultural policies as well as the objectives of the Water Framework Directive in the Ocean Pact, to foster a broader, holistic governance approach needed for the sea and the marine environment and fish stocks in the Baltic region. Socio-economic assessments should accompany environmental assessments when evaluating alternative maritime uses.

The BSAC has contributed to the important work on the evaluation of the CFP, consultations on the Vision 2040 and the Ocean Act.

The BSAC considers that the forthcoming European Ocean Act and the Vision for Fisheries and Aquaculture 2040 must provide a coherent and integrated framework for ocean governance, with clear long-term strategic direction for sustainable fisheries, aquaculture and resilient coastal communities across all relevant policy areas.¹⁹

¹⁹ BSAC statement on the Ocean Act as of 13 July 2026 [link](#) and BSAC statement on the Vision 2040 as of 7 May 2026 [link](#).