



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels  
MARE.D3/PCO/mbe/Ares (2020)

Mr Esben Sverdrup-Jensen  
Chair BSAC Executive Committee  
es@pelagisk.dk

**Subject:** BSAC recommendations on the Commission's proposal COM/2018/368 final for a control regulation amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control

Dear Mr Sverdrup-Jensen,

I would like to thank the Baltic Sea Advisory Council for the detailed recommendations delivered on the Commission's proposal concerning the revision of the EU fisheries control system.

We take note of the reservations of the fisheries representatives concerning the proposed provisions in Article 14 on the logbook and the margin of tolerance. We consider that the requirement to complete a logbook at the end of each day is a fundamental requirement necessary for the proper control and sound management of the fisheries. The accurate reporting of catches is a corner stone of the Common Fisheries Policy. Catch recording and reporting has significantly improved with the introduction of electronic logbooks and is at its poorest where no logbooks are required. Therefore, it is necessary to use modern electronic systems of reporting and to extend the scope to all EU fishing vessels. Furthermore, we consider that catches should be recorded in the logbook before landing, i.e. before the operator is aware whether he might be inspected or not in port. This is the reason why completion of the landing declaration after weighing cannot replace the logbook.

We agree with the comment of the representatives of the small-scale industry about continuous monitoring of engine power. This monitoring will enhance fair competition between fishers/fleets and improve the protection of the stocks.

We noted that the representatives of recreational anglers are in favour of a licence or registration system for recreational fisheries. We also note your comments relating to

chartered vessels for recreational fisheries and your recommendation to have a registration and tracking of these vessels.

For weighing, we understand that the sector considers that they should be allowed to weigh on board (for fish that is packed at sea).

We noted that OIG have underlined the need for initiatives to improve the control of the compliance with the technical measures, such as training of inspectors. We noted also the suggestions for specific references to technical measures in the provisions on serious infringements.

As you know, the Commission's proposal is currently being discussed by the co-legislators. It is too early to say at this stage when the discussions will be concluded but the Commission will continue to work constructively with the co-legislators to ensure that a more fit-for-purpose control and enforcement framework is in place.

Let me thank you for your recommendation. I am looking forward to our continued fruitful cooperation and invite you to take contact with Ms Pascale Colson ([Pascale.Colson@ec.europa.eu](mailto:Pascale.Colson@ec.europa.eu); + 32 2 29 56273) should you have any further question on this reply.

Yours sincerely,



**Bernhard FRIESS**  
Acting Director-General