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Copenhagen Friday 12th November 2021

RE: Draft Joint Recommendation on fisheries management measures in Natura 2000 sites in the German EEZ in the Baltic Sea.

Dear Leonie,

Thank you for your e mail of 15th October 2021 sending the draft Joint Recommendation on fisheries management measures in Natura 2000 sites in the German EEZ in the Baltic Sea. Thank you for following up with the Annex III showing international fishing activities in the areas. You gave a deadline of 12th November 2021 for comments.

The BSAC ExCom had until 10th November 2021 to send comments. They were also made aware that you were willing to meet and discuss the draft. The Secretariat has received two sets of input. There is no overall BSAC position on the German draft proposal.

The Union of German Cutter Fishery/German Cutter-and Coastal-Fishermen's Association have sent remarks, which are attached. ./ They do not see that the measures are shown to be necessary; low level of fisheries revenues in the areas means there has been low fishing effort: freezing existing effort in the areas would be the logical conclusion; they recommend following the Danish approach to developing fisheries management measures.

The input received from German Angling Association (DAFV) and the European Anglers Alliance (EAA) is attached ./ They express concerns about the lack of consultation of the angling communities; they claim that bans on recreational fishing in the SACs mentioned are unjustified.

They also include an extract from the Commission draft technical note on criteria and guidance for protected areas designations (Version 4), where there is a section on effective stakeholder participation (Section 3.5 Stakeholder involvement). This is also attached. ./.

The BSAC appreciates this section in the revised Version 4 of the guidance. It recalls the BSAC basic principles on the development of the fisheries management measures in Natura 2000 and protected areas from 2019, referred to in the footnote.¹

Kind regards,



Esben Sverdrup-Jensen
Chair of the BSAC Executive Committee

Copied to BALTFISH Member States and to DG Mare

¹ Find the BSAC basic principles here:

<http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-basic-principles-on-fisheries-management-meas/BSACbasicprinciplesfisheriesmeasuresFINAL.pdf.aspx?lang=en-GB>