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BSAC 2020-2021/15

Copenhagen Tuesday 21st July 2020

Dear Maris Stulgis,

Consultation of the ACs on Commission Implementing Decision on a standardization request to the European Committee for Standardisation as regards circular design of fishing gear in support of Directive (EU) 2019/904 Ref Ares. 2020 328798 - 24/06/2020

Thank you for inviting the Advisory Councils to provide comments to the above draft Commission Implementing Decision, and for providing background information to the draft.

The BSAC Executive Committee has been consulted. One of its members has sent them detailed comments to the draft. The Executive Committee has taken note. It has also been informed of the exchange of e mails on the subject between the BSAC Secretariat and the Secretary General of Eurocord, and with you. Thank you for the transparent approach, and for sharing relevant information on the dossier.

I am pleased to note that most of the comments in the BSAC paper (attached./.) have been dealt with through the technical committee of Eurocord, and which has been working closely with DG Mare. It is also positive that the Commission has mandated CENELEC to start the work of circular design of fishing gear through conception, manufacturing and use, involving all relevant stakeholders.

The Advisory Councils have been active on the subject, and several of them, including the BSAC, have recently sent recommendations on the Single Use Plastics Directive and on fishing for litter.¹

¹ <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/Multi-AC-advice-on-on-Single-Use-Plastics-Directiv>

These relate to key requirements on the reduction of the impact of certain plastics on the environment, including the recommendation to carry out further consultation with gear manufacturers to investigate the possibility of developing measures to extend the life of fishing gear by using more durable material, but also so it is easier to recycle at its end of life.

The gradual move towards a circular design of fishing gear will benefit from a collaborative process, with all expertise and hands on deck. We recognize the need to minimize the use of plastics and at the same time not to compromise the selective properties of gear as well as other savings, such as reduced fuel consumption. The circularity process is very important, and we want to tackle it in a holistic way. We look forward to working further on the subject.

Kind regards,



Esben Sverdrup-Jensen
BSAC Executive Committee chair