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BSAC 2021-2022/4

Copenhagen Friday 23<sup>rd</sup> April 2021

**Re: Activities relating to the work of the Marine Expert Group under the Birds and Habitats Directives and the draft technical note on criteria and guidance for protected area designations**

Dear Annick de Lombaerde,

The task of the BSAC is to advise the European Commission and Member States on matters relating to management of the fisheries in the Baltic Sea. A pre-requisite for sustainable fisheries management is a healthy Baltic Sea and ecosystem, and the BSAC has a dedicated Ecosystem Based Management (EBM) Working Group to deal with ecosystem related issues.

The work of DG Environment in relation to the marine space is very important to the BSAC. The BSAC has benefited from DG ENV expertise at its meetings, for example to present and explain the work to designate marine protected areas and develop fisheries management measures in these protected areas. Following a meeting in 2019, the BSAC adopted a set of basic principles on the development of fisheries management measures in Natura 2000 and protected areas.<sup>1</sup>

In connection with this, I want to refer to the subject of marine protected area targets under the EU’s Biodiversity Strategy. At a meeting of the BSAC Executive Committee on 29<sup>th</sup> January this year,<sup>2</sup> a BSAC member introduced the draft technical note on criteria and guidance for protected area designations developed by DG ENV.

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<sup>1</sup> <http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-basic-principles-on-fisheries-management-meas>

<sup>2</sup> [http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-\(3\)](http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-(3))

The note contains a set of guidelines connected to the Biodiversity Strategy.<sup>3</sup> The concern that was raised was the section about categorising fishing and hunting as an extractive activity together with mining, and as such not seen as compatible with strict protection (on page 14 of the Version 2 note: “Extractive activities, such as mining, fishing, hunting or forestry, are not compatible with this level of protection,”). Such categorisation may affect recreational fishing, small-scale and coastal fishing. Some representatives of fisheries and anglers proposed that the BSAC sends a request to the Commission to delete fishing and hunting from these guidelines in the technical note.

The BSAC is committed to sustainable fishing activities and to environmental sustainability. In the opinion of the BSAC, the wording in the technical note should be amended, so as to delete the reference to fishing as incompatible with strict protection.

The draft technical note was on the agenda for the meeting of the Marine Expert Group on 22<sup>nd</sup> – 23<sup>rd</sup> February 2021. The report from the meeting came online on Friday 16<sup>th</sup> March 2021. I note that the note is being updated, and the next discussions will be in June 2021.

Only registered members are invited to the meetings of the Marine Expert Group. For the sake of transparency, the BSAC would like to be able to attend the meeting and observe the proceedings and discussions, and to know who takes part.

In conclusion, I would also be very pleased to invite DG Environment to a coming BSAC meeting to explain the work of the Marine Expert Group and the processes related to marine protected areas and targets, as well as experts from the Working Group on Good Environmental Status to inform about the review of the Marine Strategy Framework Directive.

Kind regards,



Esben Sverdrup-Jensen  
Chair of the BSAC Executive Committee

Copied to BALTFISH Member States and to DG Mare

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<sup>3</sup> <https://circabc.europa.eu/sd/a/f298de23-322d-4cac-ba27-75ccabf03755/Doc%20NADEG%2020-10-03%20Draft%20Technical%20Note%20Protected%20Area%20Targets.docx.pdf>

A Version 2 was made available, February 2021 and it included a definition of no-take zones (footnote 39):

[http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Executive-Committee-\(3\)/Draft-note-protected-areas-v2-clean.pdf.aspx?lang=en-GB](http://www.bsac.dk/getattachment/Meetings/BSAC-meetings/BSAC-Executive-Committee-(3)/Draft-note-protected-areas-v2-clean.pdf.aspx?lang=en-GB)