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Copenhagen Tuesday 24th August 2021

Ref: BSAC/2021-2022/16

Re: BSAC reply to the draft amended Commission Delegated Regulation on the functioning of the Advisory Councils

Dear Charlina Vitcheva,

Thank you for inviting comments to the draft Commission Delegated Regulation amending Delegated Regulation (EU) No 2015/242 laying down detailed rules on the functioning of the Advisory Councils under the Common Fisheries Policy.

The BSAC ExCom has been consulted and invited to comment.

The BSAC is satisfied that the proposal builds on the discussion and exchange with the Advisory Councils since the start of the year. We note that the Commission has taken into account a lot of the input received.

With respect to the proposal to improve the balance in chairing positions, this confirms current practice in the BSAC.

We note the strengthening of requirements for an appropriate level of representation of OIGs, whilst at the same time maintaining the balance of 60% - 40%, as laid down in the Basic Regulation Annex III.

One small-scale fisheries representative has commented that whilst the Commission's proposal about priorities and orientation of the advice helps to improve the situation concerning the representation of interests, the interests and representation of small-scale interests must not be limited.

The proposals to improve the working methods to ensure transparency and respect of all opinions are noted. Use of an additional cover note for Advisory Councils to better explain the purpose of their recommendation is beneficial, rather than following a set template for providing advice.

The BSAC would like to see a similar commitment from the Commission on the rationale behind its proposals, as well as a reflection on the advice provided by the Advisory Councils.

Introducing a requirement for external and independent performance reviews poses no problems. The BSAC has done one, and can repeat the exercise at timely intervals.

We take note of the criteria in the Annex to classify members into the respective interest groups. Classification of members has not been an issue for the BSAC. There have instead been occasional discussions on whether to accept a particular organisation into the BSAC, which falls under the competence of the Member States. We will have to see how the criteria work in practice, and we hope that the Commission can provide help if we are in any doubt.

Kind regards,



Esben Sverdrup-Jensen
BSAC ExCom Chair

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