

Sara Colliander, Fisheries Director,
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Ministry of Enterprise and Innovation
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By e mail

Your ref: N2018/04753/FJR

Our ref BSAC/2019-2020/1

Copenhagen Friday 21st June 2019

Consultation with the Baltic Sea Advisory Council regarding a draft joint recommendation:
Derogation from the landing obligation in the Baltic Sea for plaice ICES Subdivisions 22-32

Dear Sara,

Thank you very much for your letter of 7th June 2010 concerning the draft joint recommendation derogating plaice from the landing obligation and thank you for consulting the BSAC.

We consulted the BSAC Executive Committee as soon as possible and invited them to send in comments.

The Secretariat has received comments from the representatives of the fisheries and from the OIG.

From the fisheries representatives there is strong support for the proposal. They refer to the positive development of the plaice stocks, as documented in the recent ICES assessment. They have been repeatedly calling for such a derogation, and they refer to experience from the fishermen that plaice survive discarding. Discarding of plaice does happen and this is in their view a waste of resources. If the plaice were released as soon as the haul comes onboard, rather than being sorted on board, which is also time and labour consuming, the plaice would have a greater chance of survival.

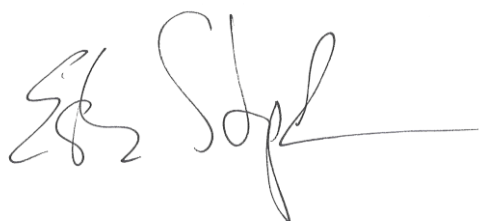
A representative of the small-scale is not against exemptions from the landing obligation in general, for example for passive gears. More studies are needed to look at the individual gear, as well as conditions onboard the vessel. Studies are also needed into the passive gear, so as to separate it from the active gear. At the same time, there is a need to look more closely at the factors concerning survival rates of both plaice and cod.

Representatives of the OIG are opposed to the proposal. They consider it poorly supported by relevant science and documentation from the Baltic Sea. In their view, the proposal totally removes all incentives to improve selectivity or reduce unwanted plaice bycatch. They also refer to the need for concrete measures to improve selectivity, as well as provisions for monitoring and compliance with the landing obligation. They are also critical of the procedure followed; for some the consultation process has not given sufficient time or opportunity to read through all the documents.

On the basis of the input received, the BSAC is unfortunately unable to give a consensus opinion in support of or against the proposal.

We fully appreciate being consulted. We would, however, like to highlight that we would have welcomed more time to study the proposal as well as the background documents. It would probably not have led to a consensus advice, but it would have given us longer to consult and discuss the proposal.

Kind regards,



Esben Sverdrup-Jensen
Chair BSAC Executive Committee



Andrzej Bialas
Vice Chair BSAC Executive Committee