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Ref: BSAC/2020-2021/7
Your ref: Ares (2020)1964081 - 07/04/2020

By e mail

Copenhagen Thursday 14th May 2020

Subject: BSAC recommendations on the Commission's proposal for a control regulation amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control COM/2018/368 final: Follow-up

Dear Bernhard Friess,

Thank you very much for your letter of 7th April 2020, replying to the BSAC and its recommendations on the above proposal (BSAC/2019_2020/21).

We took note of your clarifications and explanations to some of the recommendations made by the BSAC.

Your reply was sent to the BSAC Executive Committee and to all General Assembly members.

One particular issue has been raised by an ExCom member from the fisheries interests, and I think it is important to pursue this and seek clarification.

It concerns the proposed provisions in Articles 14 and 15 and completion of the fishing logbook. In the recommendations from the BSAC, several members of the BSAC noted that the proposed measure to have an electronic logbook for all vessels is not fit for purpose. They stated that the rules on electronic logbook reporting that currently apply only to the vessels over 12 metres in length should remain in place. They recommended to delete Article 15.2 obliging the masters of vessels under 12 metres to report in electronic logbooks before entering into port.

This is seen as a rule difficult to handle for the small-scale vessels. Some members of the OIG underlined several advantages of electronic logbooks and did not agree to its deletion.

We noted in your reply that the requirement to complete a logbook is fundamental to the proper control and sound management of the fisheries, and that it is necessary to use modern electronic systems of reporting and to extend the scope to all EU fishing vessels.

Members of ExCom find that this explanation is unsatisfactory and disregards the well justified comments provided. The measures proposed are not easily applied in practice without tailor-made technical solutions.

This is very much a practical and safety issue rather than a control issue. It is easy to imagine how the conditions are on board small vessels, in particular up to 8 metres, without a wheelhouse in the case of bad weather conditions such as rain and with the motion of the sea and manned with only one person. So, we seek advice from you on what technical solutions are or will be available for use on such vessels. More detailed information on possible technical solutions would greatly help and facilitate BSAC work on securing compliance in all fisheries and for all fleet segments.

The BSAC is ready to discuss and clarify this in more detail with you.

We look forward to hearing from you.

Kind regards,



Esben Sverdrup-Jensen
Chair BSAC Executive Committee

Copy to: DG Mare Baltic Unit, BALTFISH Member States, Fisheries Council of the European Community, European Parliament, European Fisheries Control Agency, ICES and HELCOM