

Director-General Ms Charlina Vitcheva,
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Ref: BSAC/2022-2023/14

Dear Ms Vitcheva,

Copenhagen Wednesday 13th July 2022

Subject: Baltic Sea Advisory Council **recommendations for the fishery in the Baltic Sea for year 2023**

On behalf of the Baltic Sea Advisory Council (BSAC), please find attached the BSAC recommendations for year 2023.

The table, in the submitted document, presents the BSAC recommendations and the minority positions.

Positions are gone into more detail in the document; under each stock we explain the recommendations of the BSAC and of dissenting opinions.

I hope that the proposed template for presentation of recommendations and suggestions will not have a limiting effect on the way we present the different views and opinions of the members.

The difficult and delayed scientific advice have led this year, more than before, to split member's opinions.

This year also the questions have been raised on the interpretation to be given to the EU Regulation No 1380/2013¹, with regards to the rules of procedure. In particular, the Commission was informally addressed, by one of the GA members, about the role and opinions of the General Assembly members, who are not members of the ExCom. Eventually, also for this year, reflecting the exceptional circumstances, the BSAC has decided to include within the document, all comments made by members of the ExCom and also those provided by the members of the General Assembly.

¹ REGULATION (EU) No 1380/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2013 on the Common Fisheries Policy

Clarity is also needed, in order to offer a meaningful advice, and for practical reasons relevant to the functioning of the BSAC. Therefore a revision of the rules of procedure will be undertaken before next year's recommendations. The Commission will be included in the discussions on that matter and kindly requested to provide input.

This revision will allow for the BSAC to use precise working methods and measures to ensure efficiency and transparency by reflecting and respecting all opinions expressed by members and in delivering meaningful advice.

The impacts of the pandemic and the crisis caused by the war in Ukraine are felt in the fishing sector that called for commensurate flexibility in the setting of fishing opportunities.

One key issue for the BSAC is the urgent need to implement technical solutions to reduce bycatch. The BSAC makes a clear call to approve, adopt and implement, as soon as possible, new gears that have been tested and meet the required selectivity. A presentation of work conducted in Poland on a promising gear limiting cod bycatch in the flat fish fishery was given during the Executive Committee of the 30th June 2022².

During the Joint Working Group meetings of the 20th June 2022³, the issues of environmental factors consequences on Baltic fish stocks were discussed at length. In particular, prey-predator relationships during the life cycle of key pelagic stocks and cod, along with interactions of other species.

We strongly encourage the Commission to push for more research on these topics and explore how the scientific advice and political decisions can better understand, measure, and acknowledge these complexities.

As always, we appreciate the participation, at our meetings, of your colleagues and the dialogue and explanations. We look forward to receiving your reply and explanations to our recommendations.

Kind regards,



Jarek Zieliński
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.

² [http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-\(8\)](http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Executive-Committee-meeting-(8))

³ [http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Joint-Working-Group-\(4\)](http://www.bsac.dk/Meetings/BSAC-meetings/BSAC-Joint-Working-Group-(4))