

To the BALTFISH Presidency  
Normunds Riekstins Director and BALTFISH Chair  
Fisheries Department  
Ministry of Agriculture, Latvia

By e mail [normunds.riekstins@zm.gov.lv](mailto:normunds.riekstins@zm.gov.lv); [santa.jansone@zm.gov.lv](mailto:santa.jansone@zm.gov.lv)

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Copenhagen Monday 12<sup>th</sup> July 2021

Dear Normunds Riekstins,

**Subject:** "Baltfish Presidency draft supplementing Joint Recommendation on the mitigation measures to prevent bycatch of Baltic Proper harbour porpoise in the Baltic Sea fisheries" **BSAC input to your draft**

I want to thank the BALTFISH Presidency for consulting the BSAC on the above draft supplementing Joint Recommendation 2 on harbour porpoise mitigation/protection measures. We appreciate that you succeeded in reaching an agreement in the High Level Group. However, your short deadline of today has made it very difficult to get feedback from all members. Nevertheless, I am impressed with the collective effort made by members to give you qualified input.

All the input received has been collected together and is attached, clearly showing who wrote what and why. ./.

This section extracts the essential from those who have contributed:

Coalition Clean Baltic finds that the draft does not go far enough to address parts of the ICES advice that were not addressed in the first BALTFISH Joint Recommendation, and questions the reasons for not proposing the use of ADDs. The Association of Fisheries Protection and the Confederation of Fishermen and Fish Processors of West Lithuania recommend the use of electronic deterrents, rather than implementing closed areas. More detailed comments about the PAL system are provided, including input from a company representative developing this system. The Union of German Cutter Fishery refers to good experience with interactive PAL-Pingers and voluntary agreements to stop fishing when there are observations of higher densities of harbour porpoise. The Darlowska Group of Fish Producers and Shipowners states that closing static gillnet fisheries in the Baltic coastal area will eliminate the small-scale fisheries.

The Association for Low Impact Coastal Fishery-PO expresses concerns about the area selected with respect to the actual geographical distribution of the Baltic harbour porpoise. The Danish Fishermen PO and the Fishermen's Association of Bornholm and Christiansø state that the proposed closure lies outside the area of occurrence of Baltic harbour porpoise population; an obligation to use pingers would be much more appropriate. The Swedish Fishermen's PO finds the closure unacceptable and not in line with the principle of proportionality. The Finnish fisheries members, Danish Fishermen PO, the Fishermen's Association of Bornholm and Christiansø and the Swedish Fishermen's PO find the suggested BALTFISH declaration of intent about national measures unrealistic.

On the basis of the input received - and I underline that very limited time was given and during the holiday season - the BSAC finds the draft BALTFISH proposal completely lacking.

I commend to you all the attached input. ./.

The BSAC calls for further discussion on how to work towards a realistic and workable solution to protect the Baltic harbour porpoise and to maintain the commercial fisheries. The BSAC also urges continued work to test and further develop the ADDs that are on the market, especially in order to meet concerns expressed about national security. The BSAC is more than ready to facilitate a meeting to discuss all this and to invite the providers of technical solutions.

Finally, we look forward to our Management Team meeting with you on 10th August 2021, when we can to discuss this and other issues. A draft agenda follows separately.

We look forward to hearing from you.

Kind regards,



Esben Sverdrup-Jensen  
Chair BSAC Executive Committee

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