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BSAC 2020-2021/5

Copenhagen 1st May 2020

Dear Risto,

Consultation of the Baltic Sea Advisory Council regarding a BALTFISH draft joint recommendation on salmon

Thank you very much for your letter of 8th April 2020 consulting the BSAC about your joint recommendation to exempt from the landing obligation all catches of salmon in the Baltic Sea caught with trap-nets, creels/pots, fyke-nets and pound nets (as already agreed by STECF) including pontoon traps, as long as pontoon traps are equipped with an attached knot-less bag (“Vittjanpåse”).

The BSAC Executive Committee has been consulted and invited to comment.

The Association of Fisheries Protection, Germany replied that pontoon traps are not used in Germany; they express support for exemptions of catches from the landing obligation as long as evidence of high survivability is detected by scientists. Their full answer by e mail is attached. ./.

The Federation of Finnish Fisheries Associations supports that the exemption from the landing obligation should apply to all catches of salmon in the Baltic Sea caught with trap-nets, creels/pots, fyke-nets and pound nets, including pontoon traps. The FFFA supports the idea that fishermen should use a more gentle way of emptying pontoon traps than the “traditional” emptying method as was described in the SLU Aqua report. However, fishermen should be able to choose this method themselves according to local conditions instead of forcing them to use pontoon traps equipped with an attached knot-less bag, the “Vittjanpåse”. In the reply from the FFFA, they explain why the findings concerning the use of this knot-less bag are not conclusive and why its use can jeopardise health and safety of fishing, and have a detrimental effect on the salmon. Their full reply is attached ./.

Four OIG organisations: Fisheries Secretariat, Coalition Clean Baltic, European Anglers Alliance, Finnish Association for Nature Conservation and WWF in the first sentence of their input consider that the proposed derogation from the landing obligation as regards salmon in the Baltic Sea caught in pontoon trap-nets, including those with a knot-less net bag modification (vittjanpåse) should not be granted or extended. Their full reply is attached. ./.

No other comments were received.

We look forward to hearing the outcome of your deliberations in the BALTFISH HLG, as well as the opinion from STECF.

We also look forward to the BALTFISH Forum, which you have planned for 8th June 2020. Given the current situation, we look forward to knowing whether that will be held as a web conference meeting.

Kind regards,



Esben Sverdrup-Jensen, BSAC Executive Committee chair