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Your ref: 4.2-3.1e/1760/2021  
BSAC 2021-2022/17

Copenhagen Monday 27<sup>th</sup> September 2021

Dear Normunds Riekstins,

**REF: BALTFISH draft Joint Recommendation on Technical measures for Baltic Demersal Trawl fishery – consulting the BSAC**

Dear Normunds Riekstins,

Thank you for your letter which we received on 14<sup>th</sup> September 2021, consulting the BSAC on the draft Joint Recommendation on technical measures for the Baltic demersal trawl fishery. The draft was sent post-haste to the BSAC for consultation.

At our BSAC General Assembly meeting on 22<sup>nd</sup> September 2021, I took note of the appeal made by our invited guest Director General Vitcheva for innovative solutions at all levels to be developed and introduced.

I referred to the BALTFISH proposal at the BSAC Executive Committee on the same day and invited feedback. It is difficult to deal with short deadlines from BALTFISH, and I made this point at the Executive Committee where members provided their initial comments.

The BSAC wants to see new and more selective gears in place in the Baltic, and by means of a faster process of approval. This has been a long-standing issue in the BSAC and in our discussions with BALTFISH and DG Mare.

The details of the draft proposal are complex. We really regret that there has not been the opportunity to have a more technical and thorough presentation and discussion.

Due to the short deadline, the BSAC can only provide preliminary comments.

Representatives of the fisheries welcome initiatives that enable fishermen to adapt to the conditions at sea. They fully support the rationale of the BALTFISH proposal which is to have an open-ended list of gear that can reduce bycatches of cod by a certain percentage [50%]. It is not clear from the draft whether the three gear options referred to already qualify as meeting the 50% reduction in by-catches of cod. However, a one-size-fits-all solution is not the solution. Moreover, they find it difficult to accept changes introduced on a compulsory basis. A faster way of developing and approving gears is also needed. This could be by means of national institutes developing and approving gears, until STECF is able to come out with possible negative assessment at a later stage.

A representative of the OIG underlines that the development of gears is essential and that their use should be made compulsory. He agrees that a faster way of developing and approving gears is needed. However, the introduction of new, selective gears may even create new problems in the light of the advice just provided by ICES for the western Baltic cod. Nevertheless, there is support for trying out the proposed gears, because under current conditions, there are no other options.

I would like to underline that the BSAC would really like to go through, discuss and understand the proposal and the annex.

For that reason, and if time allows, given current deadlines and workload, I would like to invite BALTFISH to a technical meeting with the BSAC, so you can present the Joint Recommendation at a technical level. If this is convenient for you, the BSAC would be very happy to arrange a meeting and see to the practical details.

Kind regards,



Esben Sverdrup-Jensen  
Chair BSAC Executive Committee

Copy to BALTFISH Member States and to DG Mare