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BSAC 2022-2023/2

Copenhagen Monday 25th April 2022

BALTFISH draft Joint Recommendation regarding Derogation from the landing obligation in the Baltic Sea for plaice (*Pleuronectes platessa*) in ICES Subdivisions 22-32

Dear Normunds and dear Santa,

Thank you for your e mail of 11th April 2022 to the BSAC, consulting the BSAC on the draft Joint Recommendation, which is from page 5 of the Draft JR:

The BALTFISH HLG recommends the following derogation from landing obligation for plaice:

Provided that scientific evidence for high survival for plaice in the Baltic Sea receives a positive opinion from STECF, exemption from the landing obligation should apply to catches of plaice below Minimum Conservation Reference Size, MCRS, of 25 cm caught in the period from 1 November to 30 April when fished with gears as indicated:

- Trawl (OTB, OTT, PTB and TTB), Danish (SND) and Scottish seine (SSC) with a mesh size of 90 mm or more in ICES subdivisions 22-23 and by
- Trawl (OTB, OTT, PTB and TTB), Danish (SND) and Scottish seine (SSC) with a mesh size of a minimum of 105 mm in ICES Subdivisions 24-32 and by
- Gillnet (GN), entangling net (GTN) or trammel net (GTR) with a mesh size of at least 90 mm in ICES subdivisions 22-32
- When discarding plaice caught in the cases referred to in paragraph 1, these catches shall be released immediately.

BALTFISH is prepared to discuss and to investigate whether it could be advisable and scientifically justified to further narrow down the scope of this Joint Recommendation with a view not to including vessels above 18 meters LOA fishing for plaice with trawl from the landing obligation with respect to plaice.

You have invited the BSAC to send comments by Monday 25th April 2022.

We have consulted BSAC ExCom members and highlighted the short deadline for input.

./ The reply from the Danish Fishermen PO, and the joint reply from Coalition Clean Baltic and Fisheries Secretariat are attached in one paper.

The latter two organisations point out that the input they provide is not conclusive and has been rushed in a way that is not compliant with the BSAC rules of procedure.

./ Low Impact Fishers of Europe (LIFE) has sent to the Secretariat comments which are also attached. Three members of LIFE, which are members of the BSAC ExCom, have written to confirm the LIFE paper.

./ The Association of Fisheries Protection has sent to the Secretariat its paper as a supplement (please find a translation into English at the end)

In line with the above comments from CCB and the Fisheries Secretariat, I very much want to underline the challenges of short deadlines. It makes it difficult for the BSAC to work optimally with BALTFISH and for the BSAC to deliver coordinated and quality output in time. Any early warnings and provisional details and drafts of draft Joint Recommendations are welcome and needed. This would give BSAC members the time to coordinate their positions and then meet and hold joint discussions on points where we could possibly find common ground.

Kind regards,



Esben Sverdrup-Jensen
BSAC Executive Committee Chair