

Ieva Žundienė  
Department of Fisheries  
Ministry of Agriculture  
Gedimino Ave. 19  
LT-01103  
Vilnius  
Lithuania

By e mail: [ieva.zundiene@mfa.lt](mailto:ieva.zundiene@mfa.lt)  
cc: [Jolanta.Cesiuliene@zum.lt](mailto:Jolanta.Cesiuliene@zum.lt) ; [Ana.Sedenko@zum.lt](mailto:Ana.Sedenko@zum.lt)

BSAC 2022-2023/28

Copenhagen, Wednesday 26<sup>th</sup> October 2022

**Subject: BSAC comments on BALTFISH draft Joint Recommendation regarding a derogation from the landing obligation in the Baltic Sea establishing a discard plan as regards salmon in the Baltic Sea (ICES Subdivisions 22-32)**

Dear Ieva,

Thank you for your email of 12<sup>th</sup> October 2022 to the BSAC, consulting the BSAC on the draft Joint Recommendation regarding derogation from the landing obligation on salmon.

The regulation in force<sup>1</sup> applies to fyke nets, pound nets and all other types of trap nets, except pontoon traps without an attached knot-less bag. The Article 4 of the Delegated Regulation 2021/1417 requires providing additional scientific information to the Commission on the survivability of salmon released from trap-nets including pontoon traps and pound-nets at the latest by 1 May 2023.

The draft Joint Recommendation presents scientific evidence (4 scientific articles attached) as required by Article 4 of the Delegated Regulation 2021/1417, and proposes to extend the exemption to salmon caught from the pontoon trap that are emptied directly into a water hold in the fishing vessel.

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<sup>1</sup> COMMISSION DELEGATED REGULATION (EU) 2021/1417 of 22 June 2021 supplementing Regulation (EU) 2016/1139 concerning the specifications for the landing obligation as regards salmon in the Baltic Sea for the period 2021-2023  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R1417>

You have invited the BSAC to send comments by Wednesday 26<sup>th</sup> October 2022.

We have consulted BSAC General assembly and Executive Committee members and highlighted the short deadline for input. The replies received from 9 members are attached in one paper.

Once again, the BSAC wants 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.

Furthermore, considering that STECF winter plenary meeting is scheduled for the 14<sup>th</sup> November (with a two weeks deadline for sending-in documents), we assume that this will only leave 2 days (26 to 28<sup>th</sup> October) for BALTFISH to take into account BSAC's comments. Such a tight schedule and complex answer from stakeholders could cast doubts on the consideration given to our input.

We are grateful for our regular meetings that allow to better coordinate work between BALTFISH Presidency and the BSAC. In the future, we hope that this will enable to further our cooperation and to fully engage on the topics that are key to our membership.

Kind regards,



Jarek Zieliński  
BSAC Executive Committee Chair