

**Email from BSAC chair to BALTFISH Presidency 5<sup>th</sup> July 2019**

**Fra:** Esben Sverdrup-Jensen

**Sendt:** 5. juli 2019 11:47

**Til:** [Risto.Lampinen@mmm.fi](mailto:Risto.Lampinen@mmm.fi)

**Cc:** Andrzej <[abialas@oceana.org](mailto:abialas@oceana.org)>

**Emne:** Correction in regards to Consultation with the BSAC on a draft BALTFISH Joint Recommendation

Dear Risto Lampinen,

First of all, congratulations to Finland on taking over leadership of BALTFISH for the coming season. Fisheries and the ecosystem in the Baltic is in many areas in a critical state. I look forward to working together with my membership, the Finnish administration and the rest of BALTFISH on tackling these issues. I especially look forward to our meetings on September 3-4 in Helsinki.

On June 21. The BALTFISH received recommendation from the BSAC on proposed Joint Recommendation on derogations for high survival in the plaice fishery. In our letter, we compiled the input written received from members of the BSAC. I have been made aware, that the communication in regards to the position of “representatives from the fishing industry” could be read and understood as broad representation from the fishing industry. However we only received input from one representative from the fishing industry strongly supporting the derogation in all fisheries - Danish Fishermen’s Association PO. Although all the input received was also sent directly to BALTFISH, I regret the way it was formulated in our letter as it mistakenly could be read as broad support within the industry. As only two organizations from the industry responded to our consultation, and only one was positive in all fleet segments, we as BSAC have no real indication on how broad the support is for a derogation in regards to plaice. I hope members of BALTFISH are more successful in getting responses from the relevant national fleets involved in the fishery.

I hope my correction and comments are well received and the BALTFISH leadership will offer to make sure that this important correction is communicated to the rest of the BALTFISH membership ahead of any further discussion on the issue.

I wish you a wonderful summer and look forward to seeing you in Helsinki in September.

Rgds.

Esben Sverdrup-Jensen

BSAC chair

To members and substitutes of the BSAC Executive Committee

BSAC/2019-2020/8

Copenhagen Friday 12<sup>th</sup> July 2019

Dear members and substitutes of the ExCom,

Following the consultation from BALTFISH on a proposed exemption of plaice from the landing obligation, the Secretariat and I have been made aware of the risk of a possible misunderstanding of the BSAC response to BALTFISH.

In our letter to BALTFISH we communicated that “From the fisheries representatives there is strong support” for the proposed exemption. Within the deadline, the BSAC secretariat had received two written responses from fishing industry representatives. Only one communicates full support for the full extent of the exemption, although the Secretariat was notified verbally that the written response was supported by other fisheries organisations. Thus, the letter from the BSAC initially only reflected the position of “strong support” of one fisheries representative (Danish Fishermen PO).

The BSAC Secretariat forwarded to the BALTFISH presidency all of the written input received in the consultation phase.

Following consultation with the vice chair, I have in an email to the BALTFISH presidency made Member States aware of this and of how the nuances of the letter should be understood. Following this, I have received support for the proposed exemption from fisheries representatives from both Germany (the Union of German Cutter Fishery) and Sweden (the Swedish Fishermen PO). Thus, the wording in the original letter does reflect the position of broad support from the fishermen targeting plaice in the Baltic.

The BSAC strives to seek consensus on recommendations when dealing with consultations from Member States, BALTFISH and the Commission. However, this was not possible with regard to the proposed exemption for plaice. The case is special, since, due to the time constraints, it was not possible to have a thorough discussion on the issue at the joint working group meeting on 11<sup>th</sup> and 12<sup>th</sup> June 2019. The process was thus conducted by means of a written procedure only and with a very short deadline.

We have communicated clearly to BALTFISH that the BSAC was unable to give a consensus opinion in support of or against the proposal. We added that we fully appreciated being consulted, but that we would have welcomed more time to study the proposal, as well as the background documents.

The process underlines the need for the BSAC to communicate very clearly and transparently. It also underlines the need for all relevant members of working groups and ExCom to actively engage in the consultations, and to reply by the deadlines, including where possible, in those cases where members agree with proposed changes to legislation and other proposed management measures.

Below I have inserted the link to the consultation documents on the BSAC website. All responses from the BSAC members are available on request from the BSAC Secretariat.

Kind regards,



Esben Sverdrup-Jensen  
Chair BSAC Executive Committee

<http://www.bsac.dk/BSAC-Resources/BSAC-Statements-and-recommendations/Reply-from-BSAC-to-BALTFISH-about-exemption-of-pla>