

To Veronika Veits, Director
International Ocean Governance
and Sustainable Fisheries
DG Mare
By e mail

Copenhagen Thursday 28th November 2019

Your Ref. Ares (2019) 6551530 - 23/10/2019

BSAC 2019-2020/15

Dear Ms Veits,

Thank you for your letter of 23rd October 2019 concerning the place of Small-Scale Fisheries (SSF) in Advisory Councils. You ask how the rules aiming at encouraging the participation of SSF in Advisory Councils are being implemented, according to Commission Delegated Regulation 2015/242 laying down detailed rules on the functioning of the Advisory Councils.

You also ask to what extent they were implemented, what difficulties were encountered and/or how the situation could be improved.

The BSAC was established in 2006, and fisheries organisations representing fisheries interests for all the vessel sizes operating in the Baltic from all eight Baltic Member States joined, together with representatives of the other interest groups affected by the CFP. Of the organisations representing fisheries, the vast majority of their vessels are below 12 metres, the next category being from 12 to 17 metres, followed by larger vessels up to 40 metres. Vessels are fishing with passive and active gears. All vessel sizes are represented on the BSAC Executive Committee. The small scale fisheries have thus always been an integral part of the BSAC membership. The BSAC is a forum to represent all categories and sizes of vessels in the Baltic and to give advice and recommendations that relate to the diversity of fisheries taking place.

While the Executive Committee (Ex-COM) includes normally up to 25 members, the General Assembly (GA), after consultation of the Commission, may decide to appoint an Ex-COM of up to 30 members to ensure an appropriate representation of SSF.

At its meeting in on 11th May 2017, the General Assembly amended the BSAC statutes, so as to have the possibility to extend the ExCom to 30 members to ensure appropriate representation of small-scale fleets. When it met the following year, 8th May 2018, the General Assembly decided to extend the ExCom to 30 members, thus providing seats for 18 representatives from fishermen, and 12 representative of other interest groups.

Three SSF organisations took the opportunity to fill these extra seats: the Darłowska group of fish manufacturers and shipowners fishing boats (Darłowska grupa producentów ryb i armatorów łodzi rybackich SP. Z.O.O), the Association of Fisheries Protection, (Fischereischutzverband) and the Association for Low Impact Coastal Fishery (Foreningen for Skånsomt Kystfiskeri, FSK).

The GA and the Ex-COM shall ensure a balanced and wide representation of all stakeholders, with emphasis on SSF where appropriate. The number of representatives of SSF should reflect the share of SSF within the fishing sector of the Member States concerned.

The BSAC General Assembly currently comprises 41 members: 28 member representatives from fishermen and 13 member representatives of the other interest groups affected by the CFP. We consider this to be broad based and representative of stakeholder interests across the Baltic. We do not have full information about the fishery or number of fishing vessels for the specific SSF organisations, but as mentioned, most of the SSF is organised in most of the fisheries organisations that are members of the BSAC.

Each AC shall seek to ensure the efficiency and full participation of all members through [...] the provision of interpretation and translation services.

The BSAC rules of procedure state that for General Assembly and Executive Committee meetings, if interpreting is to be provided, a request from members is given to the Secretariat by a deadline set by the Secretariat. The Secretariat arranged interpreting for five of its meetings in the BSAC year 2018-2019: covering requests for German and Polish interpreting at Executive Committees, General Assembly and two working groups. During the current year, the Secretariat is again meeting requests and, depending on meeting room facilities, providing the service.

Each AC shall offer additional compensation to fishermen representing SSF organisations for their efficient participation to its work on top of the reimbursement of their travel and accommodation expenses. Such compensation shall be duly justified for each case.

At its meeting on 8th May 2018, the Executive Committee decided to give additional compensation to SSF representatives at meetings of the BSAC. They are given a per diem of 125 EUR to compensate for loss of earnings. They are required to sign a declaration of honour to state that they are an active SSF fisherman representing one of the BSAC member organisations and that in order to attend the relevant meeting, they are unable to fish. Members are informed of this requirement each time invitations to meetings of the BSAC are sent. If applied, the Secretariat will accept this request from fisheries representatives of any member organisation, provided they meet the conditions.

During the year 2018-2019 it was given to 3 SSF representatives to attend 10 of the BSAC meetings during the year. The budgeted maximum is for 14 during the current BSAC year; so far 6 have received per diem for three BSAC meetings.

A more pertinent issue for the BSAC is how to ensure active participation in the ACs. In general, it is a challenge to encourage active fisheries representatives from vessels of all vessel sizes to the BSAC meetings and work. What is at stake here is not related to vessel size, category or type of fishery, but to the time that fishermen have to be away from their fishery and engage in the activities of the BSAC.

We remain at your disposal for further information and dialogue.

Kind regards,



Esben Sverdrup-Jensen
Chair BSAC Executive Committee



Andrzej Bialas
Vice Chair BSAC Executive Committee