

Director-General Ms Charlina Vitcheva
Directorate General for Maritime Affairs and Fisheries
European Commission
Brussels
J99-05/17
B-1049 Brussels
Belgium

Ref: BSAC/2022-2023/27

Copenhagen, Friday 28th October 2022

Subject: BSAC recommendation on western Baltic Herring, in response to the Commission invitation to provide further explanations

Dear Ms Vitcheva,

The Baltic Sea Advisory Council (BSAC) sent on the 13th July 2022 its recommendations for the fishery in the Baltic Sea in 2023¹. Your answer for the Commission² was received by the BSAC on 20th July 2022. The letter invites the BSAC to explain more concretely the BSAC recommendation on the western Baltic herring stock.

The BSAC Pelagic Working Group met on the 3rd October 2022 and discussed this topic. Without prejudices to the different positions expressed by various members of the BSAC, the Working Group decided to give further explanation to the Commission. It seems particularly important to provide more details on the call for a rebuilding plan and the views on the MultiAnnual Plan for the Baltic Sea (EU MAP).

The BSAC does not refer to missing scientific elements for this stock. The issue at stake here pertains to management choices. The EU Baltic Sea MAP applies to herring in subdivisions 22–24. This plan is not adopted by Norway and thus not used as basis of the advice for this shared stock.

The BSAC recommends a twofold approach to the management of this stock.

¹ <http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-fisheries-2023/BSACrecommendationsfinal13072022-corrected14072022.pdf.aspx?lang=en-GB>

² <http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/BSAC-recommendations-for-the-fisheries-2023/2022-07-13-Reply-to-BSAC-on-Baltic-FO-2023-recommendations.pdf.aspx?lang=en-GB>

In the short term, the BSAC agrees that the **MultiAnnual Plan for the Baltic Sea** should act as a rebuilding plan and that it can be the guiding tool for the management of this stock for now. The Commission should aim to set the TAC according to its own EU MAP in the short term. The Commission in its letter to BSAC of May 2020³ highlighted that the EU MAP provides very clear and useful rules for setting TACs and remedial measures for stocks under pressure, such as western Baltic herring. The Commission should therefore request ICES to put the EU MAP advice as its headline advice. For 2023, ICES gives a total catch value for the EU MAP in the annual catch scenario table on page 2 of its advice.

In the midterm, the BSAC recommends that a specific **rebuilding plan** be prepared and discussed with the third countries. Agreeing on a management strategy for one stock through this rebuilding plan, with all the countries involved in the fishery of this stock might prove more successful than for the EU MAP. This rebuilding plan could follow the EU MAP for western Baltic herring and maybe be even more specific. ICES work through its workshop on guidelines and methods for the evaluation of rebuilding plans (WKREBUILD) could be useful for this purpose.

We hope that this letter brings more clarity on the BSAC consideration of the western Baltic herring stock.

We await your answer on this very important issue for the Baltic fisheries, and we look forward to hearing from you.

Kind regards,



Lise Laustsen
BSAC Pelagic Working Group Chair

³ <http://www.bsac.dk/getattachment/BSAC-Resources/BSAC-Statements-and-recommendations/Letter-from-BSAC-and-PELAC-on-rebuilding-plan-for/DGMareletter-BSACreply.pdf.aspx?lang=en-GB>