



Carla Montesi Director of Directorate E
Baltic Sea, North Sea and landlocked member states
European Commission
1049 Brussels
Belgium
MARE E2/SJ/ab ARES (2014)

Copenhagen 28th March 2014

Dear Carla Montesi,

Thank you very much for your letter of 7th February 2014 inviting us to come with a recommendation on measures in a future long term management plan for the Baltic Sea.

We welcome the chance to discuss the questions and to come with input. I shared your letter with the members of our recent working group on 25th February 2014 to discuss a response to the BALTFISH draft on discards and I referred to it at our recent Executive Committee meeting on 26th February 2014 and asked for initial comments.

Members agree that right now, we are addressing a number of issues which are closely woven together. Some of the questions in your letter are already linked to the forthcoming landing obligation: such as minimum conservation reference sizes and technical measures. They also relate to the Commission's Consultation Document on the development of a new framework for technical measures in the post reform CFP. At the end of this month, we aim to have a discussion on the consultation document on technical measures and prepare output on that.

It is important to be clear how the two forms of regulation specified in the Basic Regulation – on multi-annual plans and technical measures frameworks – will link together. One key wish from our side is to keep things simple, to avoid duplication and to avoid too much detail being imposed top down. That is the spirit of the CFP reform. This would imply having an overarching framework for setting the goals, whilst the details can be left to regionalization.

Baltic Sea Regional Advisory Council

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With respect to the scenarios for adopting and implementing technical measures, the BSRAC has repeatedly called for as much decision making to take place at the level of the region and with the involvement of stakeholders. That can apply to technical measures: selection of gears and gear types, closed areas, moving on provisions and so on, as well as the adjustment of minimum conservation reference sizes. We have previously called for a more adaptive fisheries management and we hope that this can be possible under the regionalization as described in the Basic Regulation.

What we call for is a level playing field across the Baltic. One of the strengths of the reformed CFP is that it opens up for regionalization. We do not want to go back to the days when rules were defined and implemented by individual member states. We seek very much this regional solution with common rules for all.

We now have to go through your questions in more detail and answer them in conjunction with the questions put in the Consultation Document on the technical measures.

So we will get back to you as soon as possible with a more detailed response.

Kind regards,



Reine J. Johansson
BSRAC Chair