

Normunds Riekstins by e mail  
Director of the Fisheries Department  
Ministry of Agriculture  
Latvia  
on behalf of Latvian BALTFISH Presidency

Copenhagen 22nd May 2014

Dear Normunds,

Thank you for sending the final draft of the Discard Plan elaborated in accordance with the last agreements reached in the HLG on 30th April 2014. Thank you for including us in the final consultations before presenting the Plan to the European Commission.

We would like to praise you for the hard work that you have put in to produce the final draft. It is a good piece of work and it presents in a well-balanced way an outline for a discard ban in the Baltic.

There are also two specific technical remarks which we would like to make and which have been sent to us by the chair of the Demersal WG after a careful read through of the text. These comments have been made at previous meetings of BALTFISH:

1. **Exemptions for certain types of fisheries:** There is also a need for an exemption for other species caught in poundnets. The exemption is particularly required for herring and mackerel which can be released live from the open parts of the nets by lowering the head rope. No handling of the fish is necessary. Catches of several tonnes are sometimes encountered and it would be a waste if such fish have to be killed because of legal requirements. The survival rate from this gear type is 100%.
2. **De minimis rule:** the text in places is not entirely clear because sometimes it refers to damaged fish and sometimes it refers to fish damaged by predators such as seals.

With respect to damaged fish, the fishing industry has repeatedly referred to catches of fish damaged by gas bombs, paints and other pollutants. These catches must also be covered by the de minimis provisions.

Members of the BSAC are ready to work together with you on the practical implementation of the landing obligation in the Baltic. This is going to be a very big change in the way the fishery is conducted and we do not yet know what will happen once the landing obligation is implemented. It will be a learning curve for us all. That makes it extremely important that we hold regular meetings with BALTFISH after the introduction of the ban. It is also very important that we follow up our cooperation with BALTFISH through contacts with the Commission, the European Parliament and the European Control Agency.

We look forward very much to further continued involvement and dialogue.

Kind regards,



Reine J. Johansson  
Chairman of the BSAC



Ewa Milewska  
Vice-chair of the BSAC

Copy to Ginta Perle-Sile

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Baltic Sea Advisory Council

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