

By email to: German BALTFISH Presidency BALTFISH Control Expert Group Bernd.Soentgerath@bmel.bund.de

Ref: BSAC/2024-25/32

Copenhagen, 17 March 2025

Subject: Implementation of the revised Control Regulation

Dear BALTFISH Presidency,

Based on the feedback received from our members, the Baltic Sea Advisory Council would like to draw your attention to the fact that several new provisions of the revised Control Regulation give many stakeholders serious cause for concern regarding their implementation.

The stakeholder engagement in this context is primarily the responsibility of the Member States. We therefore encourage Member States to proactively engage with stakeholders, including BSAC, and to ensure that consultations are held in a timely manner, allowing all relevant actors to contribute meaningfully to the process.

However, for this engagement to be meaningful and effective, it is essential that Member States are given sufficient time to conduct thorough consultations with stakeholders. Allowing adequate time for Member States to engage with stakeholders will ultimately contribute to a more balanced and effective regulatory framework. To this end, the BSAC is also addressing the EU Commission on the matter.

We wish to remind, that the BSAC members are uniquely positioned to provide technical expertise in fisheries control as they have firsthand experience and ground-level insights. We strongly believe that they should have the opportunity to participate more extensively in the discussions especially on the implementation of the Control Regulation. To this end, the BSAC calls on the BALFISH Presidency to include the BSAC in the discussions of the BALTFISH Control Expert Group on the implementation of the revised regulation.

The revised Control Regulation will shape fisheries management and control for many years to come. A well-prepared and participatory implementation process is key to ensuring that the regulation is not only effective but also sustainable in the long term. We trust that Member States will make every effort to facilitate comprehensive stakeholder involvement and allow the necessary time for this important dialogue.

BSAC remains committed to supporting this process and looks forward to continued collaboration with Member States.

Kind regards,

Lise Laustsen BSAC Pelagic Working Group Chair

Jarek Zieliński BSAC Executive Committee Chair