



MINISTER FOR FISHERIES AND EQUAL OPPORTUNITIES AND
MINISTER FOR NORDIC COOPERATION

Low Impact Fisheries of Europe
Att.: Jeremy Percy
Executive Director
Mail: director@lifeplatform.eu

5 April 2018

Dear Jeremy Percy,

I kindly refer to your letter dated 7 March 2018 regarding long-term sustainability of fish stocks in the Baltic Sea Region.

You address many highly important and relevant issues with regard to fisheries management in general, but also equally important to more specific issues concerning fishing activities in the Baltic Sea.

I agree that there is room for improvement and that we have many challenges ahead of us in order to maintain and improve sustainable fishery in general and in the Baltic Sea.

I am familiar with your organisation and appreciate the work of your organisation and the way you handle the interests of small-scale fishermen across Europe.

Being aware that that the landing obligation in the Baltic Sea is not fully complied with in all fisheries, I believe that the concept IUU, Illegal, Unreported, Unregulated fisheries in the context of the Baltic Sea is a wrong term as IUU covers much broader aspects of fishing activities and related activities. In my view, in this context it will be more appropriate to refer simply to discards.

Unfortunately, discards still occur in the cod fishery in the Baltic Sea. The total number of cod discarded in the Baltic Sea as you refer to for 2015 and 2016 seems at first sight high. I know the figure is contained in reports from ICES, The International Council for Exploration of the Sea.

However, if the estimates are based on weight and total catches as ICES also does, discard in the Western and the Eastern Baltic Sea is estimated to a share of 3 % and 13 % for the two areas respectively. It looks less dramatic, but there is still room for improvements.

I do recognize the need to improve the situation with respect to the implementation of the landing obligation, especially the monitoring and control parts. This view is also reflected in my letter of 23 January 2018 to Commissioner Karmenu Vella in which I underlined the need to continue discussions on the best way forward to monitor and enforce the landing obligation. I also underlined the need to continue discussions on possible use of fully documented fisheries where it makes sense within a framework that ensures a level playing field. It is important that we try to find solutions horizontally at the EU level or alternatively within a regional context. In this respect, Denmark also supports the proposal from the European Parliament for a new framework regulation on technical measures to include a provision on pilot projects on full documentation of catches and certain derogations from technical measures.

You refer to the reduction of the MCRS, Minimum Conservation Reference Size, as a highly questionable decision. It is my opinion that the reduction of the MRSC from 38 cm to 35 cm serves to facilitate the implementation of the landing obligation resulting in fewer catches of cod below the MCRS.

With regard to selectivity, it is of great importance to have gears with the best possible selectivity and many trials are carried out with a view to developing the most suitable gear to the current situation.

As a concrete measure to mitigate adverse effects on the spawning stocks, I would like to point out that the closure period and the spawning periods for the cod fishery are now identical following the change for the closure period in the Western Baltic Sea.

With the introduction of the landing obligation for species subject to regulation in the Baltic Sea applicable from 1 January 2015, a completely new set of regulations was introduced. We must acknowledge that this is a huge challenge for both administration and fishermen. We will continuously gain more knowledge about weaknesses in the implementation, and thus be better prepared to adjust management initiatives including control and monitoring measures.

You refer to the legal requirement for Member States to observe Article 17 of Regulation 1380/2013 with respect to allocation of fishing opportunities. I certainly believe that we comply with this obligation. With respect to Denmark, I can inform you that we last year adopted a new national fisheries regulation aiming at improving the situation for the small-scale fishermen using low impact gear in order to maintain and develop activities in local societies.

I have carefully read your letter and considered your statements and suggestions and I fully understand your concerns. I hope my written reply has addressed your concerns in a sufficiently comprehensive way, while, of course, recognizing that there may still remain differences of opinion.

Kind regards,

A handwritten signature in blue ink, consisting of a large initial 'K' followed by a series of loops and a long horizontal stroke.

Karen Ellemann