



## NGO considerations for BALTFISH members on the Multiannual plan for the main Baltic Fisheries

The undersigned NGOs welcome the European Commission's proposal and appreciate the general lines of the plan, for example the clear ambition to include bycatch species in the plan. However, the plan does not adhere fully to what the Common Fisheries Policy stipulates. The proposal as it is currently written invites different interpretations and confusion for both managers and stakeholders. We have, on a number of areas, found weak or non-existing links to both the CFP Regulation and the so called Inter-institutional Task Force agreement on Multiannual Plans between Parliament and the Council that we wish to highlight. In particular, it is clear that the proposal lacks a wider ecosystem consideration.

We welcome the use of delegated acts as the main tool to facilitate regional adaptations. However there are ways to make the use of delegated acts more clear and to set goals for what they should achieve. Also, in the case that Member States do not adhere to the timelines that have been set, the plan should clearly state that the European Commission will take action.

It is our view that all major regulations that will have an impact on the fisheries should be gathered and clearly stated in one piece of legislation. It is unfortunate that there are several ongoing processes running in parallel with finalization of this management plan, both regarding scientific advice and other related regulations such as the landing obligation, Omnibus regulation adjustment and the new technical framework. These processes are meant to deliver advice and support to the development of management plans. We see a great need to clearly shape this plan in such a way as to facilitate inclusions of new and relevant targets and objectives at later stage, and not within a 6 year timeframe.

Therefore we feel it important to amend this proposal with several additions.

- The objectives must be fully in line with the following articles of the CFP Basic Regulation: article 2 on the objectives of the policy; article 9 on the objectives of the plan; and on article 10 on the content of the plans. The plan should give more direction to the delegated acts which are meant to cover almost all details on everything from emergency measures to technical regulations (MCRS, closures, gears etc.).
- The scope should be wider to at least cover all species that are incidentally caught: fish, seabirds and mammals.
- The plan must contain correct data on Fmsy ranges and the intention to **add Biomass targets** in line with MSY must be clear in the plan (CFP art 9-10).

- Fmsy must be considered as the upper limit to exploitation in order to ensure that the article 2 of the CFP Basic Regulation is fulfilled.
- There is a need to include clear provisions on how to set TACs and that the abundance of cod, the main predator must be prioritised.
- The plan has no clear ambition to fulfill the objectives of the MSFD ;this is only mentioned in recital 3) and not followed by any objectives or targets.
- Revision of the plan must include also Fishing mortality and Biomass values in a reasonable way. Commission may propose a review of exploitation and conservation reference parameters on the basis of periodic benchmark exercise by ICES. The Task Force clearly call for such link (annex 2, point 9). Article 14 on the evaluation of the plan should therefore include a revision clause to ensure that the plan is updated in this respect.

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