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## MINUTE

**From a meeting of Working Group 1 of BISAC, 23 November 2022**

**Subject : "Fishing gear selectivity "**

On November 23, 2022, at the Continental Forum Hotel, Constanța, Romania, and via ZOOM video link, a meeting of working group 1 of BISAC took place on the topic: "Selectivity of fishing gear".

The online meeting was attended as guests by: Mrs. Pinelopi Belekou - DG Maritime Affairs and Fisheries of the EC, Mrs. Steliana Bejan APM Constanța , Mrs. Oana Stancovici - APM Constanța , Mrs. Bianca Whiles - DG MARE, Mrs. Laura Rull del Aguila - DG MARE , Dr. Victor Nița - "Grigore Antipa" Institute, Constanța, Dr. Otilia Mihai - Romanian Ministry of Environment, Prof. Dr. Violin Raykov - Varna Institute of Oceanology, Mr. Mihail Leonov - Ministry of Agriculture and Rural Development Romania , Ms. Dimitrina Chakarova - IARA, Ms. Polina Tsoneva - "Strategma" OOD, Ms. Tihomira Trifonova - "Strategma" OOD.

The meeting was opened by the chairman of BISAC , Mr. Daniel Buhai , followed by greetings to the guests.

Following is a presentation by Assoc. Dr. Violin Raikov on the topic "Selectivity of fishing gear - principles, importance, measures". Technical measures are rules that govern how and where fishermen can fish. They aim to control the catch that can be taken with a given amount of fishing effort, as well as to minimize the impact of fishing on ecosystems. The measures are an integral part of the regulatory framework of most fisheries management systems, incl. in the territorial waters of the Union. They can be grouped in the following ways:

- measures that regulate the operation of fishing gear;
- measures that regulate the design characteristics of the fishing gear used;
- minimum sizes below which fish must be returned to the sea;
- measures that define spatial and temporal controls (eg closed areas, restricted access areas and seasonal fishing closures) to protect juvenile or spawning fish stocks;

- measures that reduce the impact of fishing gear on vulnerable species (eg marine mammals, birds and turtles) or closed areas to protect vulnerable habitats (eg cold-water coral reefs).

The presentation also indicates a number of problems that arose during the implementation of the technical measures. Yeah, they're like that:

- Not good enough: Technical measures provide few incentives for selective fishing, given that there is no cost to discarding catches, catching vulnerable species or adversely affecting the seabed. This results in a lack of control of fishing pressure, which in turn leads to overfishing of a number of fish stocks and high discard rates in some fisheries, as well as limited protection of vulnerable habitats and species. In addition, some measures have created legal obstacles or discouraged innovation to develop more selective fishing practices, resulting in widespread circumvention, both legal and illegal, in order to reduce the economic impact of the measures.
- Difficulty measuring performance: current regulations do not specify any parameters against which to measure success. Thus, it is difficult to measure the effective contribution of technical measures to achieving the conservation objectives of the CFP.
- Strict and complex rules: Over time, technical measures have become even more numerous and complex and attempt to control too many technical aspects of fishing operations. Some of them make it difficult for the authorities to exercise control, and for fishermen to comply. In addition, they represent a large administrative burden and generate costs for Member States and stakeholders. This has a negative impact on the confidence of those working in the fishing sector and is a serious incentive to break the regulations, which in turn leads to the adoption of additional legislation as a measure against breaking the rules.
- Lack of flexibility: Technical measures are in most cases adopted as a result of a complex, lengthy and inflexible policy-based process that is not suitable for setting detailed technical rules, as the latter need frequent updating and regular review. This limits the possibilities to adapt or revise technical measures in response to changes in the fisheries, to exploit technological innovations in gear or to respond to unforeseen events. In addition, some temporary rules or derogations have remained unchanged for too long, further undermining confidence in the fishing sector.
- Insufficient involvement of key stakeholders in the decision-making process. Technical measures are based on negative, mostly coercive incentives in a hierarchical management system (ie top-down instead of bottom-up). The impression left on fishermen and stakeholders is that they are not involved in the process, and consider the technical measures to be unenforceable, do not reflect current fishing practices and are sometimes contradictory.

Fishing selectivity can be defined as the ability to target and catch fish by species, size or sex during harvesting, allowing all incidental bycatch to be released. Selectivity plays an important role in the development of sustainable and economically viable fisheries. The results of selectivity experiments can be relevant to fishermen to allow them to catch only target fish and ensure the substantial return of young fish.

The presentation gives an example of the selectivity of gill nets when catching trizona. The conclusions are that as the mesh size of the bag increases, the amount of small individuals that escape the trawl increases. At the same time, the average length of the fish caught increases, i.e. it is part of the reproductive biomass that has already been involved in reproduction. Regional fishing commissions strive for maximum mesh sizes that would allow maximum "catch" of juveniles. The minimum allowable catch size for bluefin tuna specified in the Fisheries and Aquaculture Act (2001)

is 7 cm. This fact is indicative that in order to comply with the measure of use of the resource specified in the law, the size of the 'eye' of the trawl should be 8 mm, which would lead to catching individuals in the proportion  $L_{75\%}=7.8$  cm. This measure is essential to prevent the exploited resource from overfishing replenishment and depleting stocks in the longer term.

For the mullet species, the minimum landing size specified in the Fisheries and Aquaculture Act is 12 cm. The minimum catch size was then changed to  $TL = 8$  cm. Recently, changes proposed to the Fisheries and Aquaculture Act in Bulgaria proposed increasing the minimum landing size for mullet to 9 cm total length. This fact is indicative that in order to comply with the resource utilization measure specified in the law, it is recommended that the mesh size of the trawl bag be 16 to 18 mm, which would result in the proportion of individuals in the proportion of  $L_{50\%} = 11.6$  and 12.4 cm respectively. This measure is essential to protect the exploited resource from overfishing and depletion in the long term. The only technical measure for mullet exploitation in the Bulgarian part of the Black Sea is the minimum landing size.

The third affected species in the presentation is mejid. For him, the minimum landing size is specified in the Fisheries and Aquaculture Act, is  $TL= 9$  cm. This fact is indicative that to comply with the measure of resource utilization specified in the law, the mesh size of the trawl bag is recommended to be at least = 18 mm, which would result in the proportion of individuals in the ratio  $L_{50\%} = 12.6$  cm, respectively. This measure is essential to protect the exploited resources from overfishing (length at first maturity estimated at 12.5 cm!) and depletion of stocks in the long term. The only technical measure in place regarding the exploitation of whiting in the Bulgarian Black Sea is the minimum unloading size.

The general conclusion of the presentation is that there is a need to introduce new technical measures - determination of mesh size for nets, the requirement for selective gear to reduce unwanted catches, specifications for the design and use of gear and measures to minimize the impact of fishing on the sea, ecosystem and environment.

Comments follow:

Mr. Yordan Gospodinov: in the month of March 2022, BISAC sent a recommendation to the Ministry of Agriculture, Food and Forestry in Bulgaria regarding the establishment of the minimum reference size for the conservation of mullet ( *Mullus barbatus* ) in the Black Sea. BISAC offers the minimum reference size for catching mullet for Bulgaria should be 10 cm, as well as to introduce a ban on catching mullet from June 1 to September 1. The proposals are based on the fact that the BISAC always uses the scientific reports of specialists from Bulgaria and Romania, as well as its member fishing associations, which carry out about 60-70% of the fish catch in Bulgaria, taking into account the opinion of environmental associations.

Following is a presentation by Dr. Victor Nita and Dr. Magda Nencu on the topic " Pilot study for scientific justification of the removal/revocation of the obligation to discard the turbot catch in accordance with Commission Delegated Regulation (2021) 2065/25.08.2021". In accordance with this Regulation, the landing obligation provided for in Article 15(1) of Regulation (EU) No 1380/2013 shall apply in the Black Sea to fisheries targeting turbot (*Psetta maxima*) with gillnets nets (fishing gear code (5) — GNS) Fulfillment of the landing obligation.

Article 3 of the regulation provides for an exception to the obligation to land the species based on its survivability. In 2022, the exception to the landing obligation provided for in Article 15(4)(b) of Regulation (EU) No 1380/2013 for species which, according to scientific evidence, have a high survival rate, applies to turbot ( *Psetta maxima* ) which is caught with anchored bottom gill nets

(GNS) in the Black Sea. Turbot caught in the circumstances referred to in paragraph 1 shall be released immediately in the area in which it was caught. By 1 May 2022, Member States with a direct management interest in the Black Sea turbot fishery shall submit to the Commission additional data on survivability estimates for turbot with gill nets and other relevant scientific information in supporting the exception provided for in paragraph 1.

The presentation follows a description of the MedBLand project (Synthesis of Landing Obligation Measures and Catch Discard Rates for the Mediterranean and Black Seas, funded by the European Commission through the Executive Agency for Small and Medium Enterprises (EASME)), with an implementation period of 2021- 2022. The main objective of the project is to identify and evaluate the management measures put in place at EU level to fulfill the obligation to land all fish catches, including measures adopted by Member States to ensure control and detailed and accurate documentation on all commercial fishing expeditions. The project provides an overview of the measures implemented by each country, depending on the specifics of the fishery and target species, to assess their effectiveness in reducing discards. The methods of work include, on the one hand, an analysis of the normative acts aimed at the implementation of the Obligation to Land, and on the other hand, the development and completion of questionnaires intended both for the control authorities (NARA) and for other interested factors. For Romania, the landing obligation applies to sprat (*Sprattus sprattus*) (since 2015) and turbot (*Scophthalmus maeoticus*) (since 2017), but after some joint recommendations with Bulgaria, a derogation/cancellation was obtained for the catch of gannet (GNS) based on the presumed high survival rate. The discard data available for Romania only included the results of pilot surveys for *Rapana venosa* fisheries carried out in 2018 and 2019. The new fisheries data collection work plan also envisages obtaining discard data.

With the reform of the Common Fisheries Policy (CFP) in 2013, measures were taken to reduce the catch thrown back into the sea by introducing a landing obligation (LO). Under the basic rules for implementing the landing obligation, all catches must be retained on board, landed and deducted from the quotas. Undersized fish cannot be sold for consumption. The landing obligation applies to all commercial fisheries in the EU in accordance with the TAC (total allowable catch) and the quota regime or the minimum conservation reference size (MCRS). In order to allow fishermen to adapt to this change, in accordance with the provisions of Article 15.d of Regulation (EU) no. 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, the landing obligation for Black Sea Member States was phased in between 2015 and 2019.

In 2016, NARA Romania and IARA Bulgaria presented to the EC a joint recommendation on the Black Sea turbot catch discard plan, taking into account the sector's opinion. As a result, the EC adopted Delegated Regulation (EU) 2017/87 establishing a 3-year plan to eliminate discards of Black Sea turbot (EC, 2017), with the proviso that Romania and Bulgaria must provide additional data on the extent of survival. Since such data were not transmitted, from January 1, 2019, the fulfillment of the landing obligation became mandatory for Romania and Bulgaria. In 2021, a new Joint Recommendation was developed by the two Member States, substantiated with bibliographic sources and scientific opinions of the Institute for Fisheries Resources (IRR) Varna and the Grigore Antipa Institute, Constanta, and the Scientific Technical and Economic Committee for Fisheries (STECF ) issued a new derogation for turbot fishing by Commission Delegated Regulation C(2021) 2065/25.08.2021 with the following remarks: - The derogation allowed for species for which scientific evidence shows high survival rates applies in 2022 for turbot caught with nets (GNS) in the Black Sea; - Undersized turbot (< 45 cm) caught in the specified circumstances shall be released immediately in the area where it was caught.

In accordance with Commission Delegated Regulation C(2021) 2065/25.08.2021 approving a plan for the discarding at sea of turbot caught with nets in the Black Sea until 1 May 2022, given that the available data refer to other marine areas (Turkey, Ukraine), Romania and Bulgaria had to provide the EC with additional data on survivability estimates for turbot caught with purse seines, as well as any other relevant scientific information to justify the derogation until the end of 2022. To obtain this information, the Grigore Antipa Institute presented a project funded by NARA to conduct a pilot study to obtain evidence for a scientific justification for a derogation from the obligation to land turbot. The specific objectives of this pilot study are:

- 1) Development of a working methodology for assessing the survival of turbot caught with seine nets (GNS);
- 2) Implementation of field activities (scientific fishing);
- 3) Registration and centralization of the data received in the field;
- 4) Calculation of the survival rate of turbot, when caught with nets, in order to scientifically justify the derogation regarding the landing obligation.

In the presentation, the methodology of the research and the obtained results are described in detail, and the conclusions are as follows:

- The final results of the pilot study showed a high survival rate of turbot caught with monofilament nets: 81.67%, in full agreement with studies conducted with the same type of gear in the South (Turkey) and North-West Black Sea (Ukraine).
- No undersized specimens were caught during the expeditions, with all individuals (both live and dead) exceeding the legal size of 45 cm. These results indicate excellent selectivity of the tool (100%).
- The percentage of bycatch is relatively low (23%), with the most common species being *Raja clavata* (64% of the total). 10 sharks and 4 porpoises were also accidentally caught.
- A shorter time in water for gills (16/18 days) resulted in a higher survival rate (86.95%/86.53%). However, even with a longer stay in the water due to adverse weather conditions (maximum 31 days), the survival rate is reasonable (78.12%).
- In general, turbot caught with nets had a high survival rate, justifying the extension of the repeal of the landing obligation.

The final results of the pilot study were submitted to NARA Romania, which in turn sent them to the European Commission through a joint letter signed with the Bulgarian partners (IARA). The Scientific, Technical and Economic Committee for Fisheries (STECF) evaluated the data and concluded that the information provided is extremely valuable, considering that it represents the first initiative to assess the survival rate of turbot caught with nets in Black Community waters sea. Therefore, the derogation from the obligation to unload the turbot has been extended until 31 December 2024.

Comments follow:

Mr. Mihail Leonov , State Secretary at the Ministry of Agriculture in Romania: The Ministry has received the letter from BISAC requesting financial assistance and is currently working together with NARA on a draft of a government decision to provide BISAC with an amount of 10,000 EUR. This should have been done years ago and is on the recommendation of the EU. The Ministry highly values the activities of the BISAC and the recommendations provided, and it would be good for them to participate together in international meetings in which the BISAC sends its representatives.

Mr. Daniel Buhai: thanked the Ministry for taking into account the letter of the BISAC for financial assistance.

Mr. Yordan Gospodinov: For fishermen, sprats, mullet and turbot are one of the most important species in the Black Sea, and although their main goal is fishing and realization of added value, it is very important for them to preserve the species for future generations. This is dictated by the fact that generations of experts, material base and enterprises that require raw materials have been created. Although the EC is increasingly allocating funds to aquaculture, fishing remains the main source of livelihood for coastal regions, therefore the HCMC should work in the direction of supporting scientific findings, which would be the basis for future issued recommendations. Such as the claim that the mesh of the sprat fishing net is increased from 6.5 cm to 8 cm, then only sexually mature individuals will be retained. As for the mullet - in the recommendation, BISAC proposed to increase the mesh size of the fishing net to 10 cm, which is more than what was proposed by the state administration in Bulgaria. From the presentation given by Associate Professor Raykov, it is clear that this proposal of BISAC is absolutely adequate and in line with scientific research and would contribute to the preservation of the species. Regarding the turbot and the conclusion of Dr. Victor Nita, Mr. Gospodinov supports the idea of extending the derogation from the obligation to unload the turbot until December 31, 2024, because it is clear from the research that the mortality rate is very low, especially with devices with a sparing fishing eye size.

Mrs. Dimitrina Chakarova: The studies conducted on the territory of Bulgaria have similar results to those of Romanian colleagues.

Mr. Marian Paiu: The studies mentioned in the presentations of Dr. Nita and Associate Professor Raykov are the first specific studies aimed at sustainable fishing and ecosystem protection in the Black Sea.

Mr. Velislav Vangelov, Chairman of the Black Sea Clam Producers' Organization – a new member of the CSCM. Only natural persons engaged in coastal fishing and small-scale fishermen participate in the organization. Since this year, the "Black Sea Clam" organization has been recognized as a producers' organization by the Ministry of Agriculture, Food and Forestry of Bulgaria. The main catch of the members is white sand clam and in this regard he shares that the authorized method of catching this species is only by hand, and the product is sold in Western Europe, where dredging means are also allowed for its catch. The producer organization "Black Sea Mussel" has a development plan, in which a point is set for the development of a device for selective catching of white clam, while a scientific and technical campaign is also being conducted in parallel. Suggests to the BISAC to prepare a recommendation for conducting a scientific and technical campaign for the development of a new selective device for catching white mussel. The legalization of such a device would take a large part of fishermen out of the gray sector and reduce unfair competition.

Mr. Daniel Buhai: Regarding the proposal made, Mr. Vangelov should say more precisely what kind of device it is.

Mr. Velislav Vangelov: it is a matter of a bottom dredging device, the parameters of which can be specified after a scientific study.

Mr. Yordan Gospodinov: In recent years, Bulgaria and Romania have developed 10 economic species that are permanently present on the market and are subject to aquaculture or fishing. As it has been discussed before at meetings of the HCMC, in some places it is written in the Bulgarian legislation - dredging and trawling are prohibited, regardless of the legislator, that there are different types of fish and shellfish, bivalves, demersal, pelagic, etc., which are caught with different fishing gear. The Black Sea, on the other hand, is radically different from the Mediterranean Sea in terms of the size of the fishing vessels and the distance at which fishing is

done, the equipment and methods for fishing are different. In Bulgaria and Romania there are very good scientific institutes and specialists, as well as a large number of fishermen who catch bivalves, also processing companies, environmental NGOs, and they are all interested in finding the best possible way to catch bivalves without there are points of conflict. It is good for BISAC to refine a text and seek cooperation with scientific institutes to find the best solution. In Romania, the catch of bivalves with a hydraulic dredge is allowed, which is regulated in the European legislation, but in Bulgaria it is not. There should also be a point in the recommendation that what is allowed in one country should also be allowed in the other.

Mrs. Pinelopi Belekou: expressed high appreciation for the work and the progress of BISAC. The selectivity of fishing gears and the protection of vulnerable species in the context of the impact of fishing is a very important topic for the EU. The two presentations and discussions at the meeting contribute to the EU's 2030 biodiversity strategy, in which bycatch and the impact of fishing are important elements, and the objectives are to conserve sensitive habitats and species. GFCM works not only in the EU, but also with third countries and at the regional level it is important to monitor the work of the Blacksea 4 fish project . At the last annual session of the GFCM in Tirana, the need for greater selectivity of fishing gears was highlighted, and work will be done to create a regional plan for vulnerable species. Gear selectivity and vulnerable species are two topics that go hand in hand and the GFCM will build on the conclusions of the Specific Working Group on Fishing Technologies. In October 2022, there was a fruitful meeting of this working group with the participation of a large number of experts from the Mediterranean and the Black Sea. For this, the development of these specific topics commented on in the GFCM should be followed regionally in order to contribute to the sustainability of fish resources. In Dr Nita's presentation, it was seen that there is still bycatch in the turbot gillnet fishery - cetaceans, shark and stingray. Selectivity would not only contribute to species conservation, but also lower fuel consumption. This is important for the fishing sector, which is currently dealing with the consequences of Russian aggression against Ukraine, which is at the root of the energy crisis. After the Covid pandemic, this is another new challenge that could not have been predicted , but is a reality. This also leads to the need for decarbonization of the fleet, with the ultimate goal being the profitability of the fishing grounds. All these topics are very interconnected. Regarding the interesting discussion about the white mussel, the EC welcomes any information on the state of this resource, because the stock is considered to be declining, even depleted. It is very important that the work of BISAC is mutual with that of scientists aimed at the sustainability of species.

Mr. Yordan Gospodinov: In 2023, BISAC will continue to work on the topic of selectivity of fishing gear, which is very important for Bulgaria and Romania and there is a need to conduct a large scientific project funded by the EC, which will be for a long period of time and to evaluate which is the most economical gear for catching white clams in the Black Sea at different depths. Fishermen are willing to assist the scientists by providing vessels for the studies.

Mr. Daniel Buhai: BISAC will follow the work of the GFCM and familiarize itself with the future recommendations. To Mr. Vangelov: In Romania, since 2018, at the initiative of the private sector and at its expense, a scientific study was carried out by the "Grigore Antipa" Institute, on the impact of the hydro-dredging on bivalves in the Black Sea. As a result of this study, the 4.5 m hydrodrag device was approved and can be used by large ships. It was also determined under what conditions the device can be used - along the contour of the isobath 15 m to the south and 20 m to the north of Cape Midia. It should also be noted that no one is currently fishing with this device, because dredging was done to increase the beach line along the southern Black Sea coast of Romania, and the areas where bivalves were previously found and where the research was

conducted have already been destroyed. After the talks with the scientific community, it turns out that it will take 2 years to restore these stocks. This is one example of how the fishing sector is neglected at the expense of larger interests. In 2021, another study was conducted by the Danube Delta Research Institute to design bivalve fishing tools with minimal negative environmental impact. As a result, the following instruments were developed and allowed: - hydro-racket with a clearance of 1.5 m used by small boats; - hydraulic racket, which is operated manually by a person standing in the water; - the third device is a hand dredger like a backpack that is placed on a person's back. These are the only devices allowed to collect the clam, at a depth of less than 20 m. While the hydro dredger cannot be used at shallow depths. These studies were carried out due to the increased interest in bivalves at the European level and as an alternative to fishing, which requires a large expenditure of energy. Currently, in Romania, the consumption of bivalves is small, despite their nutritional properties. A recommendation to the Bulgarian colleagues is to find opportunities for funding from the EU to conduct separate scientific research on various devices for catching bivalves. The researches carried out in Romania are under different conditions compared to Bulgaria - for example, in the Danube Delta area, the bottom is much different from that on the Bulgarian coasts, also the great depths are much closer to the coast in Bulgaria than in Romania.

Mr. Yordan Gospodinov: in Bulgaria , the "BG Fish" Association submitted a proposal for a ban on catching white mussels for 3 months during their reproduction, supported by 6 scientific opinions from different institutes. The Ministry of Agriculture in Bulgaria made a decision and issued an order for only one month of ban. For their part, some Bulgarian associations decided on their own and did not catch white mussels during their growth and reproduction. The one-month ban benefited a small group of people who caught small clams during their breeding season. So that this year the EC is not surprised by the data collected by IARA, that the catches are very few. The Bulgarian Ministry of Agriculture did not recognize the scientific research, but leaned on the wishes of a small group of businessmen.

Mr. Laurentiu Mirea: When was this period of prohibition in Bulgaria?

Mr. Yordan Gospodinov: the ban was from April 15 to May 15, although it was requested that it be 3 months and more.

Mr. Daniel Buhai: in Romania, white clam fishing is prohibited from June 15 to September 15.

Mr. Velislav Vangelov: the initiative to introduce a ban on catching white clams for 3 months during the breeding period is the Black Sea Clam Producers' Organization, as it is in Europe and Turkey. They will continue to insist on a 3 month ban. Regarding the development of the white clam device, the idea is to be gentle, to be used close to the coast and to be developed together with scientific institutes.

Mrs. Mihaela Mirea: regarding the recommendation that BISAC should prepare, what is the scientific name when talking about the white clam that the Bulgarian colleagues catch?

Mr. Velislav Vangelov: *Donax trunculus* ( *Donax trunculus* ) and *camellia gallina* ( *Chamelea Gallina* ).

Mr. Laurentiu Mirea: he thinks that it is not bad to have a ban on the clam and that the period is long, but for the small coastal fisherman it is of great importance when this ban will be. If it's January to March or September to December then it's fine. But if it is during the summer, when small-scale fishermen also focus on catching shellfish, such a ban would take away their livelihood.

Mr. Yordan Gospodinov: in the summer months there is the most plankton and the white clam grows the most, it spawns 3-4 times and September, October is at its largest.

Mr. Daniel Buhai: each species of mussel, be it Donax, Arenaria or Camelia gallina, has different reproduction periods and the ban cannot be general, but must be tailored to the respective species. Therefore, for small-scale fishermen, if there is a ban on catching Donax, they can catch Camellia gallina.

Mrs. Lyubov Georgieva: BISAC has already given a similar recommendation, but it is good to repeat it, because it was not taken into account. There is no information about how it is in Romania, but for Bulgaria, all the mussels in question are called under one name - white mussel. The law must mention the types of mussels separately.

Next is closing the meeting.

Minutes of the meeting: Mrs. Elena Peneva

Chairman of BISAC: Mr. Daniel Buhai