



КОНСУЛТАТИВЕН СЪВЕТ ЗА ЧЕРНО МОРЕ  
/КСЧМ/

CONSILIUL CONSULTATIV PENTRU MAREA  
NEAGRA

Сдружение, вписано в РЮЛНЦ  
на Р България  
ЕИК 176964109  
Седалище и адрес на управление:  
гр. Варна, ул. "Охрид" N 24-26, ет.1  
[office@blsaceu.eu](mailto:office@blsaceu.eu)

Asociatie, inregistrata in Registrul  
persoanelor juridice fara scop patrimonial  
al R Bulgaria, CUI 176964109  
Sediul si adresa de conducere:  
Mun. Varna, str. "Ohrid" N 24-26, etaj 1  
[office@blsaceu.eu](mailto:office@blsaceu.eu)

---

## Minutes

### For the BISAC WG 5 meeting

**Meeting of Working Group 5** – "Data collection and implementation of actions and initiatives aimed at maintaining a system of safety, health and control of small-scale fisheries and commercial fishing, in order to create better conditions, taking into account all the fisheries sub-sectors: aquaculture, landing, first sale centers, processing, storage, transport, trade and traceability centers."

A meeting of BISAC Working Group 5 took place on 30 September 2020 in Bulgaria, Varna, St. Constantine and Helena Complex, Astor Garden Hotel with the following agenda:

1. Opening of the meeting, presentation of participants – Dr Yordan Gospodinov-Chairman of BISAC, leading the WG;
2. Presentation of recommendation from the WG in 2019 – Mihaela Mirea;
3. Revision of the EU Fisheries Control System – New provisions on traceability- Mihaela Mirea, after a presentation from DG Mare;
4. Opinions of the authorities, actual status and perspectives;
5. Status of water body classification, BISAC actions and authorities;
6. Conclusions, preliminary text of recommendation.

The meeting was attended as guests and participants by Assoc. Prof. Galin Nikolov - executive director of NAFA Burgas, Mr. Dimitar Valkov - ANAF, associate professor Prof. Elitsa Petrova IRR Varna, associate professor Univ. Violin Raykov - Institute of Oceanology, Varna, Mr. Vladimir Stoyanov "Fishing in the Black Sea" Burgas, Mr. Nikolay Pavlov "Ding et al." Burgas.

Mr. Gabriel Popescu from ANPA Constanța joined via video connection.

The meeting was opened by the President of BISAC, Mr Yordan Gospodinov. Participants and guests at the meeting greet BISAC members. Greetings from Mr. Galin Nikolov and Mr. Gabriel Popescu.

Ms Mihaela Candea-Mirea presented the previous activity of BISAC in 2019, as well as excerpts from a presentation by Mr Laurence Cordier from - DG Mare - Unit D4, held on 10-10-2019: "Review of the EU control system of fisheries - new provisions on traceability". The following changes to the traceability provisions can be seen as more significant:

- ◆ Clarification of the rules on lots of fishery and aquaculture products - new Article 56a;
- ◆ Connecting a specific batch of fishery products to a specific landing by an EU fishing vessel - issuing an identification number of the fishing trip;
- ◆ Digitisation - traceability information, recorded and transmitted electronically;
- ◆ Imported and processed products are also covered;
- ◆ Clear definition of the scope of traceability provisions;
- ◆ Digitisation of IUU catches and introduction of a catch certificate (CATCH).

The scope of the lot rules and traceability information shall apply to fresh and frozen fish, fillets, dried, salted, smoked fish, crustaceans and molluscs, as well as canned fish, crustaceans and molluscs. Excluded from the field are flour made from fish, crustaceans and molluscs, unfit for human consumption or feed and algae.

Discussions:

Mr. Dimitar Valkov explained that the identification number of a fishing expedition (trip) will be generated from the electronic logbook and will replace the number on the fishing logbook page.

Regarding the BISAC recommendation sent to DG MARE and MAFW from Bulgaria (number 062 / 23.10.2019) on small-scale fishing and the proposal to declare the catch by SMS, will it be clear enough who is sending the SMS? Can the information sent be tracked and how reliable is it? Ms. Mihaela Căndea explained that the use of the word SMS is just a suggestion and, rather, the idea was for a mobile application that records catches and is easy to use by small-scale fishermen.

Mr. Gabriel Popescu: ANPA Romania has already spoken with an external subcontractor about a security application and database storage - the purpose is to collect information on catches of fishing vessels both large-scale and small-scale small. The idea is that this application can be used via a mobile phone and that the catch data sent by the fisherman can be entered directly into the national database. This application will be used based on name and password and so the system will understand where the information comes from and can be tracked.

Mr Yordan Gospodinov commented that the 2019 BISAC recommendation is a proposal, due to the fact that at the moment the control is mainly focused on larger fishing vessels. Small-scale fishermen fill out a form in Bulgaria once a month and this is a prerequisite for hiding catch data.

Mr. Florin Luchian explained that in Romania, too, large ships are mainly controlled - they are monitored by the captains and the border police. One hour before the ship enters the port of landing, the master is obliged to call the ANPA inspector. But this requirement does not apply to small boats.

Ms. Dimitrina Kostova addressed the topic of recreational fishing and the amount of fish that fast boats catch. According to unofficial data, it can weigh up to 100 kg per trip, which is IUU fishing. These boats usually leave at night and often happen to destroy fishing nets. At the same time, the law on fisheries and aquaculture lacks a text to control the activity of these fast boats, as they are not on the register of fishing vessels.

Mr. Nikolay Pavlov: These scooters and speedboats are 20 miles inland. They need to be monitored by national fisheries agencies, but they do not have this capacity. He also congratulated the classification of water in the Black Sea in Romania and asked why this is not happening in Bulgaria.

The issue of NATURA 2000 protected areas and the fact that they were designated without consultation with the fisheries sector in both Member States has been raised again. They cover traditional fishing areas, in percentage terms are huge areas, and in practice fishermen have no other good fishing places.

Ms. Mihaela Mirea explained that at the end of October a BIO-Geographic seminar is planned and BISAC members who wish can participate. Discussions at such seminars form the basis for defining protected areas. Following the designation of the area, a management plan shall be drawn up setting out which fishing activities are favourable in the area concerned.

Mr. Nikolay Pavlov: For Bulgaria, the deadline for public discussions is one month. There is no information on who participated in the working group for the creation of NATURA 2000 sites or what were the reasons for their designation.

Mr Yordan Gospodinov: The subject of NATURA 2000 sites affects commercial fishing to a greater extent in both countries. In the documentation for determining the areas, one of the reasons is the protection of Danube mackerel species (*Alosa immaculata*), but in reality it is a transitional fish that breeds in the Danube and not in the Black Sea. According to a study by the BG FISH Association, 87% of this fish is caught by small-scale fishermen or stationary fishing gear and only 13% is caught with purse seine. This species of fish is not caught by large trawlers - 0.1% of species accidentally fall into the trawl. At the same time, the Ministry of Environment and Water is convinced that fishing gear should be banned and many families will be left without income.

Ms. Mihaela Căndeia: The problem is very complicated and the decision has already been made. The ultimate goal is to protect certain ecosystems, which is not good for fishermen in the short term, but can be beneficial in the long run. For example, in Romania, when the fishing industry focused on rapana fishing, turbot populations recovered. At the same time, the role of the fisheries sector is very important as it provides income to a large part of the population and provides healthy and appreciated food. It is important that there is real communication between the authorities and fishermen, because so far it is only formal. Most

often, Member States neglect fishermen and BISAC and this is unfortunate, because only together can real and simple solutions be found.

Assoc. Prof. Violin Raykov: The Ministry of Environment and Waters is responsible for maritime spatial planning and now is the time for BISAC to request information on the stage of consultations. In general, there is not enough information on this issue in the public domain.

Mr. Vladimir Stoyanov: He gives an example with Italy - a country where fishing taxes are significant - there are no large NATURA 2000 areas. In contrast, Bulgaria and Romania, whose fishing areas are not many, but the NATURA 2000 areas cover a most of the sea - over 37%. Instead of starting from the bottom up, Bulgaria and Romania do the opposite - a general ban called NATURA 2000 and then establish a management plan, with pelagic trawling being the most affected.

Mr. Yordan Gospodinov: If these plans provide for a ban on certain types of fishing, the MMP should find a way to compensate for the loss of fishermen.

Mr. Nikolay Pavlov: To be honest, the fishermen have been "fooled" - ten years of insidious actions to set up NATURA 2000 sites, and now a month is given for recommendations. A complete overhaul of how these areas are defined in Bulgaria and Romania is needed.

Following the discussions in the working group, some recommendations appear:

- ◆ The Ministry of Agriculture and Food of the Republic of Bulgaria to initiate a procedure for the completion of the biotoxin testing laboratory and other agents in accordance with Reg.853 / 04, equipment and accreditation of all methods according to the regulation,
- ◆ Recommendation on IUU fishing through recreational fishing;
- ◆ Letter to the Ministry of Environment and Waters on the establishment of NATURA 2000 zones, the establishment of permitted fishing areas; implementation of the management plan in these areas.

The meeting was closed.

The minutes were prepared by Mrs. Elena Peneva

Chairman of BISAC - Dr. Yordan Gospodinov