



Baltic Marine Environment Protection Commission

Helsinki Commission
Helsinki, Finland, 5-6 March 2014

HELCOM 35-2014

Document title	Danish comments on the proposed Policy Groups on Agriculture and Fisheries
Code	3-7
Category	CMNT
Agenda Item	3 - Streamlining HELCOM
Submission date	26.2.2014
Submitted by	Denmark
Reference	Document HELCOM 35-2014, 3-4

Action required

The Meeting is invited to consider the attached comments.



Re: Document 3-4 Working Structure

Danish comments on proposed Policy Group on Agriculture

In general terms Denmark is of the opinion that further development of rules and regulations to be taken nationally should be promoted under the aegis of the European Union, rather than as a result of the forthcoming work in the proposed HELCOM policy group for agriculture.

However, Denmark fully supports the idea of using the proposed group as a forum for exchange of practical experience and knowledge between representatives of the Contracting States.

Therefore, in the list of possible tasks laid out on page 16 in document 3-4 only the first two and the last three bullet points should be included in the forthcoming group. The remaining bullets instructing Contracting States to develop and implement guidelines and measures and so on, should not be part of the duties of this group.

As for the proposed name "Policy Group" Denmark consider this a misleading name. Denmark prefer to retain it as a Forum or perhaps Experience Group, Knowledge Sharing Group or similar. The name should respond to the aims of the cooperation – e.g. sharing of knowledge and best practice in relation to implementation of the BSAP as well as EU-obligations under the Common Agriculture Policy, Water Framework Directive and Nitrates Directive for those HELCOM states being also members of the European Union.

Furthermore, Denmark would like the group to refer to e.g. a permanent working group in the HELCOM working structure in-stead of referring directly to the HOD group and thereby underlining the concept of knowledge sharing.

**Re: Document 3-4 Working Structure:****Danish comment related to the proposed HELCOM Policy Group on Fisheries**

With the integration of the ecosystem based approach and the integration of environmental objectives in the new Common Fisheries Policy, it would be advisable to reconsider the need for a HELCOM Policy Group on Fisheries.

In that light it is relevant to investigate the possibilities to broaden the cooperation within The Baltic Sea Fisheries Forum (BALTFISH). BALTFISH is a regional body that serves as a platform for discussion and implementation of important regional fisheries issues and related environmental aspects in the Baltic Sea. BALTFISH is based on the regionalization concept of the EU Common Fisheries Policy as referred to in the Basic Regulation (i.e. no. 1380/2013), and the main objective is to promote cooperation among administrations and other key stakeholders in developing sustainable fisheries in the Baltic Sea region.

Besides being an integrated part of the regionalization processes with regard to fisheries management in the Baltic Sea, BALTFISH can forward to the EU Commission common management proposals on fisheries. It would contribute significantly to streamlining the decision making process in the Baltic Sea if both discussions on assessment and needs for fisheries management can take place in the same forum. It should be noted, that within BALTFISH, it has already been decided to establish a Working Group on fisheries management in order to coordinate proposed measures in the marine NATURA 2000 areas in the Baltic Sea.

As a consequence of a wider incorporation of environmental issues within the framework of BALTFISH, it should be considered how the environmental authorities in the Member States, relevant stakeholders and HELCOM could be involved in a satisfactory way in BALTFISH decision making process when and where relevant.

Another point for discussion would be the involvement of the Russian Federation with respect to decisions on fisheries management related to ecosystem issues as addressed in BALTFISH. This could perhaps be done on a more general level in HELCOM HoD (Head of delegation) or by offering the Russian Federation an observer post or a post as participant in relevant working groups in BALTFISH as appropriate. In that case a "Terms of Reference" regarding participation of the Russian Federation in these working groups need to be developed.

Therefore, Denmark proposes that the HELCOM Commission discusses the pros and cons of suspending the Policy Group on fisheries within HELCOM in order to remove the extra workload and inconsistencies that may occur from establishing parallel systems under HELCOM and the Common Fisheries Policy. Likewise we propose that the HELCOM Commission contact BALTFISH (chairmanship) to discuss the possible way forward on these considerations.