



established and by indicating the expected effects of existing policies which are relevant for the management of salmon. The problems which remain should be better specified by evaluating more thoroughly the outcome of the current SAP, particularly by explaining why it failed to deliver on its objectives. Finally the report should develop and assess alternative options for a long-term plan by differentiating the nature and scope of management measures/instruments and ambition targets.

Given the nature of the recommendations, the Board would like to examine a revised draft impact assessment report on which it will issue a new opinion.

**(1) Establish a clear baseline by considering more thoroughly the already existing policies which are relevant for the management of salmon.** The report should present more clearly the current situation of the salmon stock and how it is expected to evolve over time through the implementation of the policies already in place (e.g. HD, WFD, EU Strategy for the Baltic Sea Region, HELCOM Baltic Sea Action Plan). On that basis the report should identify clearly the gaps that the new long-term plan should address. The report should present more clearly relevant background information on the current situation of the salmon stock and relevant characteristics of the sector (e.g. number/size/level of activity of vessels, number of employees, profit estimates of commercial salmon fisheries, importance of SME's).

**(2) Better specify the key problems and explain how they can be best addressed.** The report should better specify if the key problem is caused by fishery activities, and hence can be addressed by the sort of conservation measure envisaged in this initiative, or rather by other factors which determine the stock situation. In particular, the environmental dimension of the problem (e.g. water quality in rivers, harnessed rivers) should be analysed more thoroughly and linked to its drivers. The report should also be more specific about the level (EU/MS-level) at which the problems need to be addressed and should clarify the related subsidiarity (e.g. domestic rivers) and proportionality issues. In this context, the report should present a thorough evaluation of the outcome of the SAP and explain why it has not delivered on the objectives, which actors have underperformed and which concrete lessons have been learnt for the current initiative. The report should also present an analysis of transposition and compliance issues.

**(3) Develop alternative options for a long-term plan, specify concrete measures and analyse their expected impacts.** The report should improve the presentation of the option section by integrating the discussion and screening of high level options (e.g. integrated vs. non-integrated approach of relevant management measures) with the more focused development of (sub-)options under the two-step approach. It should define alternative options of an integrated long-term plan by differentiating the nature/scope of the management measures included (e.g. voluntary versus obligatory) and by specifying for each option what should be done (e.g. area closure; setting of production targets), how it will be done (e.g. expand closed areas; smolt production target X or Z) and who will be responsible (e.g. EU vs. Member States). On that basis the report should assess and compare the impacts (including the impact on administrative burdens) of the alternative options/sets of measures and define appropriate progress indicators.

#### **(D) Procedure and presentation**

The readability of the report as a stand alone document could be improved by further integrating relevant information available in documents referred to in the report (e.g. two scientific studies, outcome of the consultation). The report needs a thorough editorial and linguistic check.

## 2) IAB scrutiny process

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