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PUBLIC CONSULTATION ON A MULTIANNUAL PLAN FOR THE FISHERIES EXPLOITING DEMERSAL STOCKS IN THE WESTERN MEDITERRANEAN SEA

B. Fisheries exploiting demersal stocks in the W-Med

1. To what extent do you agree or disagree with the perception of the problem described in the background document (i.e. "high levels of overfishing and limitations of the current management framework")?

Neutral

On the 14th July 2015, during the Commission's yearly meeting on "State of Fish Stocks and the Economic Performance of Fishing Fleets", European Commission services emphasized the dramatic decline of Mediterranean stocks. All the efforts made by stakeholders, and the current management framework, have not produced the expected results considered the great reduction in the fishing efforts already implemented.

STECF report[1] on Western Mediterranean Sea, states that the exploitation levels of the stocks assessed are very high and concentrated on young ages. This over-exploitation is severely undermining the potential yield that could be obtained from these stocks and is likely to keep the biological risk of collapse at high levels.

On February 9th and 10th 2016, in Catania, European Commission services responsible for Fisheries Conservation and Control in the Mediterranean and Black Sea and the MEDAC co-organized a High-level Seminar during which scientists presented a diagnostic of the status of the resources in the Mediterranean Sea. As clearly stated by Commissioner Vella, any facts were undisputed: fish stocks in the Mediterranean are declining, some are close to depletion. Overall, 93% of the fish stocks assessed, that are only 30% of the total of the fish population are over-exploited.

2. Are there any other aspects that you consider should be taken into account when defining the problem?

As it was pointed out in Catania, other important elements than the ones strictly related to the fisheries, must be taken into account when addressing the depletion of the stocks in the

[1] Scientific, Technical and Economic Committee for Fisheries (STECF) – Western Mediterranean Multi-annual Plan STECF-15-09. 2015. Publications Office of the European Union, Luxembourg, EUR XXXX EN, JRC XXXX, XXX pp.

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Mediterranean (environment, climate change, other human impact, etc..) as to implement the ecosystem base approach to fisheries management.

WWF believes that the following aspects should be taken into account:

- In order to address overfishing in the area, the MAP should set clear objectives and time-frame for reference points (MSY, SSB, F)
- An ecosystemic approach should be adopted, ensuring a strong linkage between Marine Spatial Planning and fishery measures and the achievement of Good Environmental Status
- The management measures in the MAP should also take into account the impact of fishing activity by recreational fishers.
- Enforcement of control is crucial for the effectiveness of the measures. All fleets and vessels must be treated equally, using balanced monitoring and control methods according to their fisheries operations and characteristics. The EU and Member States need to alter their attitude towards chronic non-compliance and restrict EMFF funds to Member States with poor compliance records.

3. To what extent do you agree or disagree that the current management framework (through national management plans) is sufficient to meet the objectives of the CFP (i.e. sustainable exploitation of marine biological resources) in the Western Mediterranean Sea?

Disagree

Most of the national management plans (NMP) in the Mediterranean have been adopted before the revised CFP and therefore they are not set on the objective to reach MSY within 2020. In addition, management plans at national level have to be supported by other management measures and cannot solve the problems because in most cases they are not yet fully implemented. Moreover, national MP do not include any measure related to recreational fisheries, despite the fact that in many areas this segment plays an important role in terms of exploitation of the stocks.

Moreover, they manage fisheries by fishing gear, but as Mediterranean demersal fisheries are highly multi-species, it would be more effective to approach by species or groups of species.

Nowadays, as scientist evaluation shows, fishing exploitation of marine biological resources is far of being sustainable.

4. To what extent do you agree or disagree that complementing the current management framework with short-term measures such as emergency measures set at national or EU level (e.g. trawling ban, etc..) would be a sufficient solution to meet the objectives of the CFP?

Disagree

Multi Annual Management Plans (MAPs), should be a tool driving Mediterranean fisheries towards a sustainable exploitation of marine resources. Emergency measures should be only used as a last resource, when it becomes clear that CFP and MAPs objectives cannot be achieved without such measures.

The landing obligation is not taken into account in the current management framework. A MAP should integrate the management measures with the provisions set by the LO rather than focusing on how to deal with the fish that it is landed, the challenge of discards must be addressed in the water by promoting measures that support fish selectivity at sea and the minimization of impacts in sensitive species i.e. marine mammals, reptiles and seabirds, such as technical modifications of nets to include fish exclusion devices (eg. grids, panels, turtle exclusion devices) as well as avoidance of critical and sensitive areas, particularly during seasonal migrations.

5. To what extent do you agree or disagree that amending the current management framework would be a sufficient solution to meet the objectives of the CFP?

Disagree

MAP for sustainable exploitation of marine resources in the Mediterranean is a crucial tool. Current NMPs fail to set clear management objectives and timeline in line with the best available scientific advice as to recover stocks to sustainable levels therefore failing to meet CFP obligations. However, in order to be effective and have significant impact in terms of conservation, the Plan must be properly implemented, enforced, monitored and assessed. However, external factors such as pollution, human impacts, environment, also play an important role for the health of a given stock. Such aspects cannot be always addressed in a management plan.

6. To what extent do you agree or disagree that the current management framework is fully implemented?

Disagree

Current NMPs, poorly implemented or highly fragmented or incomplete although might be implemented in some areas, result not to be effective in achieving CFP obligations. Therefore,

NMPs are not contributing to ensure long-term sustainable management of the fishery stocks. Also in different areas the following shortcomings are still present within the NMP:

- Biological reference points not fulfilled or totally missing; consequently:

- Fail in identifying management measures that can ensure the recovery of stocks in the short term;

- Trawling ban on maërl and coralligenous beds – as foreseen in Art. 4 of the MedReg[2] - is still not fully implemented in the Mediterranean region because of the lack of an appropriate mapping of the relevant areas.

7. To what extent do you agree or disagree that an EU multiannual plan for the fisheries exploiting demersal stocks in the Western Mediterranean Sea, which would take into account the interactions between different types of fisheries, would be the best option?

Strongly agree

It is well known that Mediterranean fisheries are highly multi-specific. Managing the fisheries by species or group of species, taking into account the interactions between different gears and types of fisheries, it is the most effective approach for the sustainable exploitation of the stocks.

The existing national management plans refer to areas which are under the competence of one single Member State, while most of the fish stocks move across the territorial waters of more than one Member State. Not all the relevant areas and relevant species are covered by the existing national management plans, and some fisheries are not currently subject to measures aiming at achieving MSY and GES targets. Also, it would improve management of shared stocks between different Member States (MS).

8. Which objectives do you consider should be introduced in a possible EU MAP?

To attain sustainable exploitation of the stocks driving demersal fisheries VERY IMPORTANT

This is the main objective of MAPs under the CFP. As it has been said the multi-specificity of Mediterranean fisheries makes any approach more complex. Addressing the fisheries by groups of species (i.e. driving stocks) can be a solution.

To adopt an effective and transparent management framework VERY IMPORTANT

[2] COUNCIL REGULATION (EC) No 1967/2006 of 21 December 2006 concerning management measures for the sustainable exploitation of fishery resources in the Mediterranean Sea, amending Regulation (EEC) No 2847/93 and repealing Regulation (EC) No 1626/94

Taking into account all the pillars of sustainability (environmental, social, economic) is crucial for the effectiveness of a MAP.

To ensure socio-economic stability of the fishing sector VERY IMPORTANT

This is one of the goals that any management plan should achieve to guarantee the economic and social viability. Participation, stakeholders involvement and co-management, is a way to improve compliance.

To reinforce control, monitoring and surveillance systems IMPORTANT

The benefits of an effective control system, homogenously managed throughout all geographical areas, are evident in terms of compliance with the set of measures. Monitoring is also very important in order to align data collection and assessing with the real status of the stocks.

Other objectives:

- To ensure that the fisheries management includes an ecosystem based approach and contributes to the achievement of Good environmental status.
- Address the incidental catches of marine mammals, turtles and seabirds through the adoption of management measures aimed to reduce the impact of fisheries on protected and sensitive species.

9. Which of the following elements do you consider should be introduced in a possible EU multiannual plan?

Scope in terms of stocks, fisheries, area VERY IMPORTANT

Quantifiable targets with timeframe for achieving them VERY IMPORTANT

CFP objectives should drive both for reference points and timeline.

Safeguards and remedial actions VERY IMPORTANT

Measures should be flexible and aligned with the best scientific advices.

Provisions to implement LO VERY IMPORTANT

The measures relating to landing obligation should be included in the MAP in order to avoid any overlap.

Emergency measures IMPORTANT

All the needed actions should be undertaken to avoid any stock to get into emergency situations. However, systems are complex and it is not always possible to prevent emergencies. Or differently the measures adopted under the plan might result not effective as expected to recover targeted stocks. In these events, specific measures, especially those undertaken to check the quality of Mediterranean waters and those implemented to fight pollution and its dangerous effects, should be put in place in order to restore the good status of the stock.

10. Which species do you consider should be introduced in a possible EU multiannual plan?

ALL VERY IMPORTANT

- **GSA 1:** blue and red shrimp (*Aristeus antennatus*), hake (*Merluccius merluccius*) and red mullet (*Mullus spp*) blackspot seabream (*Pagellus bogaraveo*), deep-water rose shrimp (*Parapenaeus longirostris*), anglerfish (*Lophius sp.*)
- **GSA 5**: hake (*Merluccius merluccius*), red mullet (*Mullus barbatus*), Norway lobster (Nephrops norvegicus), octopus (Octopus vulgaris), surmullet (Mullus surmuletus), blue and red shrimp (Aristeus antennatus), red mullet (Mullus barbatus), anglerfish (Lophius sp.)
- **GSA 6**: blackbellied angler (*Lophius budegassa*), blue and red shrimp (*Aristeus antennatus*), blue whiting (*Poutassou Micromesitius*), hake (*Merluccius merluccius*), deep-water rose shrimp (*Parapenaeus longirostris shrimp*), red mullet (*Mullus barbatus*), Norway lobster (*Nephrops norvegicus*).
- **GSA 7**: blackbellied angler (*Lophius budegassa*), hake (*Merluccius merluccius*) and red mullet (*Mullus barbatus*)
- **GSA 9**: blue and red shrimp (*Aristeus antennatus*), giant red shrimp (*Aristomorpha foliacea*), deep-water rose-shrimp (*Parapenaeus longirostris*), Norway lobster (*Nephrops norvegicus*), mantis shrimp (*Squilla Mantis*), common pandora (*Pagellus erythrinus*), hake (*Merluccius merluccius*) and red mullet (*Mullus barbatus)*
- **GSA 10**: hake (*Merluccius merluccius*), deep-water rose-shrimp (*Parapenaeus longirostris*), mantis shrimp (*Squilla Mantis*), red mullet (*Mullus barbatus)*
- **GSA 11**: giant red shrimp (*Aristomorpha foliacea*), deep-water rose-shrimp (*Parapenaeus longirostris*), hake (*Merluccius merluccius*), red mullet (*Mullus barbatus*)

11. Which technical/conservation measures do you consider should be introduced to manage the species included in a possible EU multiannual plan?

To establish spatio/temporal closures (e.g. reproduction period/area, etc.) VERY IMPORTANT

The protection of spawning and nursery grounds is key for the sustainable exploitation of the stocks

To establish seasonal or daily catch limit IMPORTANT

The multi-specific nature of Mediterranean fisheries, results to be difficult to address with catch limits. There would be many choke species to deal with. Limitation of the fishing effort (spatio-temporal closures) and capacity are key tool to reduce the fishing mortality.

To define ceilings for fishing capacity and/or fishing effort IMPORTANT

In such situations where an area is assessed to be overexploited, and even if it is not overexploited, ceilings to fishing effort can be considered a useful tool to recover or maintain stocks biomass above levels which can produce MSY.

However, capacity management strategies have proven not to be effective in managing stocks sustainably in the Mediterranean and in guaranteeing the sustainability of the fishery. There are strong limitations in identifying capacity limits and such an approach is resulted in reduction in nominal capacity but not in proper fishing mortality reduction, leading to the actual overexploitation rate.

To address the selectivity of the fishing gears IMPORTANT

Selectivity is a key issue to manage fisheries. Several projects are currently running to improve trawlers selectivity (i.e. MINOUW) and reduce discards. Measures to minimize and where possible eliminate the incidental catches of marine mammals, turtles and seabirds should be included.

To apply sorting grids or similar devices VERY IMPORTANT

12. Which technical measures do you consider should be introduced to facilitate the implementation of the landing obligation?

De minimis exemptions IMPORTANT

A regime of de minimis tailored on the reported discards level, would be an effective tool to facilitate the implementation of the LO particularly in its first stage.

Mechanism to promote reduction of unwanted catches should be promoted.

Measures designed to minimize unwanted catches by modifying the gear structure IMPORTANT

Selectivity of the gears both for size and species, is a key element.

Measures designed to minimize unwanted catches by spatio/temporal closures VERY IMPORTANT

Protection of essential fish habitats should be a priority for the MAP in order to ensure target values of SSB and recruitment.

Market incentives SLIGHTLY IMPORTANT

In the Mediterranean discards are mainly related to undersized specimens of those species with a MCRS according to the EU Reg. 1967/2006. The above mentioned species are all commercial and highly valuable for the market.

13. Which mitigation measures do you consider should be introduced to minimize short-term economic and social impacts on the fishing fleet and the coastal communities depending on the demersal fisheries?

To improve the added value of fish products, including the use of ecolabelling VERY IMPORTANT

For example, MSC certification which is in progress for several Mediterranean fisheries. Also, public ecolabelling is crucial for small scale fleets, to make available the possibility to get those labels to small entrepreneurs. In particular, local fresh products should be encouraged through market incentives in respect to imported far away products.

To promote the setting of new Producer Organizations/support existing ones VERY IMPORTANT

There are several good examples of PO which can be studied as a good practice: OP Fasolari in Veneto (North Adriatic Sea) is one. POs can help in adding value to productions driving the market and managing the resource. Other professional organization might have achieved good practices and should be supported.

To provide public support under the EMFF VERY IMPORTANT

14. Which other technical/conservation measures not yet applied in the Mediterranean Sea do you consider appropriate in view of ensuring sustainable exploitation?

To establish fishing opportunities NOT AT ALL (ITALIANS, FRENCH, CEPESCA)

VERY (OCEANA, EAA) IMPORTANT (WWF)

To increase the mesh size to avoid catches of juveniles fish NOT AT ALL (ITALIANS, FRENCH)

IMPORTANT (WWF, EAA, OCEANA, CEPESCA)

CEPESCA, however, considers it crucial to change the twine (torzal) of the net from 3 to 5 mm

To establish new MCRS VERY IMPORTANT (OCEANA, EAA, WWF)

IMPORTANT (CEPESCA)

NOT AT ALL IMPORTANT (ITALIANS, FRENCH,)

Other measures to be applied are:

- Incentivize more sustainable fishing practices through preferential approach to less damaging gears and fleets.

- Spatial-temporal management to avoid catching juveniles, to protect important habitats- Encourage the increase of the twine from 3 to 5 millimeters

15. Which impacts on the ecosystems do you consider should be taken into account in a possible EU multiannual plan?

Impact on habitats and benthic communities IMPORTANT

By-catch of unwanted species IMPORTANT

Impact on juvenile individuals IMPORTANT

16. Are there specific measures (such as minimum mesh size, MCRS, permanent or seasonal closures, etc.) that merit increased flexibility under an EU multiannual plan and that could be introduced at a regional level? What would be the most appropriate legal framework for doing so, the technical measures regulation or the possible EU MAP?

Permanent and temporal spatial and seasonal closures, particularly relating to nursery and spawning areas, can be addressed as fish stock recovery areas under the MAP. Each GSA should define for target species the most sensitive areas to be fishery restricted on the basis of a MAP. MAP should define the framework of the management measures to be then locally and regionally implemented (art.18 CFP).

17. Which management framework do you consider better to manage the demersal fisheries in the W-Med?

National management plans set under the Mediterranean Regulation (with amendments) SLIGHTLY IMPORTANT

NMP were implemented without taking in due consideration the conservation objectives of the revised CFP (e.g. MSY approach and 2020 targets, LO, ecosystem approach, etc.). Moreover, the Landing obligation has come into force in the meanwhile.

An EU multiannual plan IMPORTANT

A MAP addressing conservation issues for priority stocks in the Mediterranean can be facilitated under the regionalization approach with shared stocks of UE Member States.

An international multiannual plan VERY IMPORTANT

The best solution would be to think of a MAP at the basin level, involving EU and non-EU MS. For this reason, a close coordination and cooperation between the European Commission and the GFCM is highly recommended.