MEDAC - Registered Office Via XX Settembre, 20 - c/o MASAF - 00187 Rome (Italy) - Tax identification number 97534810581 - Association registered with the Prefecture of Rome as a legal entity n.1224/2017

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Rome, 21 June 2023

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Director General
DG MARE (Maritime Affairs and Fisheries)

Florika Fink-Hooijer
Director General
DG ENVI (Environment)

Object: Involvement of MEDAC on new Fishery Restricted Areas (FRAs)

Dear Directors General,

During the MEDAC WG3 meeting, held in Montpellier on 19th April, the question emerged on the process related to the establishment of FRAs and stakeholder consultation.
It was observed that the proposals for new FRAs in the Mediterranean, while being based on scientific data for the areas they are designed to protect, are also the result of consultations which could be at times partial and not sufficiently representative of local-level stakeholders in the fisheries sector. Discussion at the WG meeting therefore focussed on the risk that the socioeconomic impact of the new FRA may not be correctly assessed, and that this could result in opposition or negative reactions by the sector.

We feel that these difficulties could be avoided with greater and more structured engagement of stakeholders, and this, as early as possible in the proposal, at least before its submission and its evaluation. In addition to ensuring greater transparency, this would also guarantee the highest possible level of effectiveness in the localisation and the subsequent management of the areas in this which protection of the environment and resources is required.

Taking the many positive experiences to date as examples (e.g., the Jabuka Pit/Fossa di Pomo process), it is clear that effective involvement from the earliest stages of the process leading to a proposal to establish a new FRA not only increases the available knowledge on the areas in question, but also favours compliance by the fishers working in that area.

We are keen to stress that, available socioeconomic data related to fisheries in these areas are often insufficient with a view to making a realistic assessment of the impact of the management measures envisaged in the establishment of a new FRA. On the other hand, the contribution of the stakeholders operating in a given area should be taken into account to provide additional data to

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strengthen the socio-economic analysis and to assess the potential impact which could result from fisheries restrictions. It is also important to emphasise that the stakeholder consultation will provide an account of the context of the area (environmental policies already in place, including existing FRAs, constraints on maritime space, fisheries management measures in place, *etc*.). By taking all these aspects into account, a more comprehensive and coherent approach can be taken in the establishment of new FRAs, ensuring both the conservation of marine resources and the sustainability of fishing activities. In the event that the area proposed as a FRA falls in international waters where the EU fleet operates or under the jurisdiction of one or more MS, regionalisation (under Art. 18 EU Reg. 1380/2013) then becomes the key tool, to be implemented through consultation with the relevant Advisory Councils.

In light of the above, considering the statutory mandate of Advisory Councils and recognizing the importance of ensuring a solid stakeholder engagement from the early stages of the process, the MEDAC candidates to be a hosting forum for the presentation and discussion to provide input to any new proposal to establish FRAs in the Mediterranean that is of relevance to the EU fleet.

We are confident that we can count on your sensitivity towards this issue.
Yours faithfully,

The Chair of MEDAC

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