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Subject: review of the definition of fishing days

Having learned of the DRAFT Recommendation GFCM/38/2014 on precautionary measures for 2015 on small pelagic stocks in the GFCM-GSA 17 and the amending Recommendation GFCM/37/2013/1, MEDAC Executive Committee[1] , following the results of MEDAC Working group on discards which met in Portoroz (Slovenia) on May, 8, 2014 calls for the review of the definition of »fishing day«.

Considering that there will be economic and social consequences arising from the reduction in the number of fishing days and considering that there is a big difference between“fishing days” and “fishing activity”, as defined in Regulation 1224/2009, art. 4, par.1, the definition of fishing day should be revised as follows:

[1] With the abstention OF WWF, OCEANA and IFSUA

"Fishing days means any continuous period of 24 hours, or part thereof, during which a vessel is present within the GSA 17 and/or GSA 18 and takes catches on board**.** "

Should this not be taken into account, paragraph 27, Part VII, (GFCM/37/2013/1) should then be modified as follows:

- "*Trawlers and purse seiners for small pelagic stocks as identified in paragraph 22 second paragraph above, irrespective of the vessel's length overall, shall not operate for more than* ***20 fishing days per month*** *and shall not exceed* ***180 fishing days per year with the registered catch*** ."

We also take this opportunity to point out that stakeholders have not been involved in the discussion for the adoption of precautionary measures for 2015 for anchovies in GSA 17, thus contravening the spirit of paragraphs 4 and 5 of GFCM guidelines on a general management framework and presentation of scientific information for multiannual management plans in GFCM area. We look forward to the opportunity to discuss this matter further in the future.

Best regards,

Giampaolo Buonfiglio
Presidente

