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Ref.: 151/2023

Rome, 14 September 2023

Charlina Vitcheva
Director General
DG MARE (Maritime Affairs and Fisheries)

Subject.- **Your response to the "*MEDAC Advice 32/2023 of 8 March 2023, on the EU Action Plan "Protecting and restoring marine ecosystems for sustainable and resilient fishing"*" (Ref. Ares(2023)3795700-01/06/2023)**.

Dear Mrs. Vitcheva,

Thank you for your response to our Advice (Ref.:32/2023 of 8 Mach 2023), as well as your response at each MEDAC advice/letter that have been sent from this Advisory Council to the EC.

In the same way, we want to thank you for your invitation, once again, and repeatedly expressed along your letter, to dialogue and discussion in order to guarantee a transition period to fishing gear with less impact on the seabed, as well as your declaration of openness and interest in the dialogue and exchange with stakeholders about new scientific studies and ideas that can help to achieve the common goals.

First of all, in the MEDAC the opinion of the 60% differs from that one of 40%, considering that the last one supports the contents of the Action Plan.

In this regard the MEDAC is willing to share with you a whole series of several scientific studies that, on many occasions, have been commented and presented from the MEDAC to the local, national and European authorities.

Some of the available scientific studies, among other aspects, show that the contact bottom trawling does not detrimentally affect the seabed in its supposed role as a carbon reserve. No in the way that is being expressed in documents as Sala et al. ("*Protecting the global ocean for biodiversity, food and climate*").

But before doing so, we must clarify the fact that MEDAC does not state that "*structural changes in the industry will be needed*" (we prefer to say: "in the activity" because when talking about the Mediterranean, we must keep in mind that we are talking about Coastal Fisheries). What the MEDAC warns is about the certainty that structural changes will take place with all that this means regarding the deep impact that it will produce on the Fishery Sector and the coastal communities.

It is important to recognize, as it is stated in your letter, the fact that there are other factors that affect the state of our seas, such as those mentioned: maritime transport, energy production, tourism, agriculture, and industry. Factors that affecting the state of our seas means that are also directly affecting the Coastal Fisheries in the Mediterranean.

For the sake of the greater transparency that MEDAC called for in its advice 32/2023, we would like to be informed about those various measures that are already being implemented in order to reduce those pressures on marine ecosystems and improve, thus, the sustainability of fish stocks.

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We are equally pleased that the EC is realizing the dangers that are threatening us when becoming too dependent on other regions of the world. Regions that, it must be remembered, do not have a regulatory heritage such as the European Union has, nor have sustainability policies, much less do they have the rights and working conditions that prevail in the EU.

On many occasions we have expressed the fact that the sad experience of the Covid19 Pandemic, which led Member States and the EU to declare food-producing primary activities (such as Fishing) as Essential, should lead to a deep reflection about the policies that have been developing in recent years which avoid us from achieving, among others, the common objectives of Food Security and Sovereignty.

That being said, and going back to what we stated at the beginning of this document, it should be remembered that MEDAC, in recent years, has been carrying out extremely important collaborative work with different scientific and research teams, devoting significant financial efforts to seeking the greatest and better dialogue with them, seeking to guarantee the best consultation and open governance procedures and thus to achieve the best and most solid and shared solutions.

In this sense, we would like to draw your attention to several scientific studies that have not been carried out in collaboration with MEDAC, which have been published in recent months providing extremely important visions in this exercise of dialogue and common work that you are rightly calling for in your letter of which we want to highlight, in a brief and non-exhaustive list, the following:

- Istituto Cooperativo di Ricerca – 2023. "***The Effects of Bottom Trawling on the Environment***", Istituto Cooperativo di Ricerca, Ministero dell'Agricoltura della Sovranita Alimentare e delle Foreste, Associazione Generale Cooperative Italiane & Alleanza delle Cooperative Italiane; Italian National Programme on Fisheries and Aquaculture 2022-2024.
- Institut Català de Recerca per a la Governança del Mar (ICATMAR). "***Considerations on the impact of fishing gear in bottom trawling on the NW Mediterranean Sea***" (ICATMAR, 23-05), 9 pp., Barcelona. DOI: 10.57645/108080.05.5.
- Institut Català de Recerca per a la Governança del Mar (ICATMAR). "***Report on the economic impact of eventual restrictions on bottom trawling at depths shallower than 1000 m in the Northern GSA6***" (ICATMAR, 23-02), 9 pp, Barcelona. DOI: 10.57645/10.8080.05.2.
- Institut Català de Recerca per a la Governança del Mar (ICATMAR). "***Simulations on fishing effort reduction of the bottom trawl fleet according to the Multiannual plan for demersal stocks in the Western Mediterranean Sea (Regulation (EU) 2019/1022)***" (ICATMAR, 20-07).
- International Council for the Exploration of the Sea (ICES). "***Evaluating the sustainability and environmental impacts of trawling compared to other food production systems***", R. Hilborn et al. (ICES Journal of Marine Science, 2023, 0, 1-13. DOI: 10.1093/icesjms/fsad115.
- "***Quantifying the carbon benefits of ending bottom trawling***", Hiddink et al. Nature 617(7960): E1-E2. DOI: 10.1038/s41586-023-06014-7. May 2023.
- Instituto Español Oceanográfico-Centro Superior de Investigaciones Científicas (IEO-CSIC, Centro Oceanográfico de Baleares). "***Inconsistencies in the multiannual plan for demersal fishing in the western Mediterranean: a vision from science***", Beatriz Guijarro, Francesc Ordines & Enric Massuti.

- Centro Oceanográfico de Santander (CN-IEO-CSIC). "***Interactions between fishing and climate change: from the sensitivity of species to the vulnerability of fisheries***", L. López-López et al.
- Institut de Ciències del Mar (CSIC), Barcelona. "***Evaluation of the resuspension of marine sediments by different models of trawl doors***", Pere Puig, Marta Arjona-Camas & Albert Palanques.

All this is directly related to the content of other MEDAC advice, such as Ref.: **13/2023 "Advice on the indicators available for the purpose of assessing the socioeconomic impact of the Mediterranean management plans"**, which reflects the reduction suffered, between the years 2008 and 2021, in the Mediterranean EU fishing fleet (Coastal Fisheries), and the direct and serious impact that the reduction of days and activity suffered by Bottom Trawling is causing in the so-called Artisanal Fishing (SSF).

The MEDAC document reflected the figures that demonstrate this direct and linear impact on other sectors of the Coastal Fisheries, with a SSF catches reduction by -30%, the number of workers by -29%, and full-time employment of - 22% showing (and demonstrating) an interrelation and direct affectation between both fleets and corroborating, thus, the fact that with such policies it is not possible to have a fleet made up of "*ecological and energy efficient small-scale fishing vessels*".

In the MEDAC complementary advice document, Ref.: **18/2022 "MEDAC Supplementary Advice. Targeted consultation on the Action Plan to conserve fisheries resources and protect marine ecosystems"**, comments were made on the method used in the EC public consultation and various contributions and complementary advice were also transferred, in addition to providing the scientific document "*Trawl impacts on the relative status of biotic communities of seabed sedimentary habitats in 24 regions worldwide*".

As it is clear, and in the way expressed in your letter, MEDAC has spent many years making great efforts for transparency, neutrality and consensus, trying to give the best and most honest advice, in defense of each one of the three pillars that must support the Common Fisheries Policy: the Social, the Economic and the Environmental. It is our desire to maintain a constant dialogue, from our equal and balanced composition as Advisory Council, with the European Institutions, Member States and scientific teams.

And it is, for all these reasons, that we wish to thank you once again for the content of your letter.

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