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Ref.182/2022 Rome, 26 July 2022

MEDAC recommendation on the COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL "Towards more sustainable fishing in the EU: state of play and orientations for 2023"

The MEDAC reiterates the following advice already sent to DG MARE and presented during the GFCM Sub-Regional Committees held in April and May 2022:

- About the par. 2.2 Fishing opportunities established for 2022 and the par. 6. Main messages and orientations for 2023 fishing opportunities proposals:

- *"Vigorous conservation efforts need to continue to reach the MSY objective by 2025, in particular by applying the West Med MAP and the new 2030 Strategy of the GFCM." […]*
  "A GFCM long-term management plan for small pelagics in the Adriatic was agreed to provide high long-term yields consistent with MSY, with reduced catch limits in 2022 for anchovies and sardines, and a freeze of capacity for pelagic trawlers and purse seiners." […]
  "The GFCM also decided to implement a ground-breaking multiannual plan for demersal stocks in the Adriatic establishing a maximum capacity limit for both bottom and beam trawlers, to achieve the MSY target in 2026 for all key stocks." […]
  MEDAC Ref. 142/2021 (29 July) "The MEDAC emphasizes that the thoughts expressed in the discussion paper "Maximum Sustainable Yield (MSY) in Mediterranean fisheries management. Some food for thoughts" (Ref. 115/2021, 26 May) are consistent with the MSY objectives embedded in CFP: although the art. 2 of CFP reports the objective to restore and maintains the populations of harvested species above levels which can produce the maximum sustainable yield, the consideranda 8 recommends that "management decisions relating to maximum sustainable yield in mixed fisheries should consider the difficulty of fishing all stocks in a mixed fishery at maximum sustainable yield at the same time […]".
  MEDAC Ref. 74/2022 (21 March) "For example, one of the most controversial aspects of the MAP for demersal species in the Strait of Sicily is due to the indication of MSY achievement for both deep water shrimps and hake. This objective is not realistic because fishing mortalities and related fishing effort with the current trawl net selectivity corresponding to the MSY of the two species are characterized by different levels. Therefore, it seems that the CFP can accommodate concepts derived from MSY and adapted to mixed fisheries, as those proposed in the cited discussion paper."
  Furthermore, for the future management plans it is needed a rapid assessment of effects, implications and of responses of management actions implemented to understand if objectives are under achievement but especially managers should deeply also evaluate the socio-economic implications of future management actions.
  MEDAC Ref. 142/2021 (29 July) "For instance, MEDAC encourages that future actions, such as:
  - the additional effort reductions to reach MSY for all species target of the EU MAP in the Western Mediterranean by January 2025, especially considering the aspects related to MSY in mixed fishery,
  - the implementation of the GFCM measures in the Adriatic Sea both for demersal species and the forthcoming transitional period and MAP for small pelagic species, should be carefully evaluate the trade-offs between ecological risks and benefits and socioeconomic impacts and impairments."

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Finally, the MEDAC deems appropriate to consider that the management measures applied in 2021 and this half 2022 already had an immediate socioeconomic impact, but the positive effects on the resources will be evident only in 2-3 years."
About the MSY objective by 2025, the MEDAC scientific expert highlighted that The MSY concept being originally developed on a single stock basis, does not explicitly encompass sustainability in wider ecosystem, economic, social and governance contexts. In such multidimensional settings, there are trade-offs between objectives such as catches of predators and their prey, catches of individual species caught in mixed fisheries, long term average yield and stability of yield, and economic yield and social factors such as employment. Deciding on these trade-offs is an integral part of defining broader strategic objectives for ecosystem based fisheries management."

- ***"In light of the aim under the West Med MAP to achieve MSY for all demersal stocks by January 2025 at the latest, the FOs set out an integrated and global approach, building on various management tools and introduce an incentive mechanism allowing for increased fishing activity to reward the use of more selective gear and efficient closure areas. Member States are encouraged to establish measures to benefit from this mechanism."***
  MEDAC Ref. 79/2020 (18 March) "MEDAC
  1) Supports the spatio-temporal closures shared and agreed with stakeholders, as a first step towards the adoption of measures to reduce the impact of fishing effort[1], until[2] technological innovations to improve selectivity[3] are checked and standardised at regional level, GFCM contracting parties and Cooperating non-Contracting Parties (CPCs);
  2) Agrees on the improvement of gears selectivity and on the implementation of studies for the development of new fishing technologies[4] , in order to improve fisheries to the benefit of workers, enterprises and marine environment and resources;
  3) Highlights the need for the assessment of results on natural resources and socioeconomic impact[5] carried out by the previous management decisions before the adoption of new selectivity and effort reduction measures with the same objectives: the sustainable fishing activities by the EU countries[6] and the recovery of depleted fish stocks;
  4) Emphasizes the importance of enforcement and compliance with Recommendations by all the contracting parties of the GFCM, by reinforcing the activity of the Compliance Committee of GFCM in order to identify cases of non-compliance and the appropriate measures to deter and stop non-compliance;
  5) The adoption of any further new gear or fishing technology aimed at increasing selectivity, should be supported by Contracting Parties' financial funds."

[1] "The implementation of trawling ban in critical zones (FRA) and periods (temporary closures) aimed at delaying the first catch size of species for which the current minimum mesh size is not appropriate would improve their exploitation patterns" and "Closure of some areas with a high density of juvenile hake, combined with effort reductions, would achieve effects comparable to those expected with higher effort reductions". Source: The state of the stocks and the role of the FRAs in management fisheries of the Strait of Sicily – F. Fiorentino Oral Communication of MANTIS results, February 2020.
[2] EAA states that also when the technological innovations to improve selectivity are checked and standardized, the benefit of spatio-temporal closures in some areas should be evaluated, shared and agreed with stakeholders.
[3] MEDREACT privileges spatio-temporal management instead the technological innovations for selectivity improvement.
[4] MEDREACT highlights the lessons of the Galion project: with existing robust technology (shifting from 40C to 50L mesh size) the rate of escapement of small fish becomes incompatible with economic constraints of fleets (too many fish lost for sale) and the difficulties in the control activities are too expensive.
[5] Ref.: 191/2017 - 22 June 2017 MEDAC OPINION ON THE SOCIOECONOMIC SITUATION OF THE FISHERIES SECTOR IN THE MEDITERRANEAN SEA.
[6] FAI CISL, WWF require the assessment of socio-economic impact of management measures before their adoption.

- *"It also adopted harvest limits for red coral, a cap on fishing effort for common dolphinfish in international waters of the Mediterranean, for deep water shrimps in the Ionian Sea, Levant Sea and the Strait of Sicily, […]"*

  MEDAC Ref. 74/2022 (21 March) *"The MEDAC agreed on the following issues to be addressed in the forthcoming management measures to be implemented at the GFCM level:*

  - According to the MEDAC scientific expert on the area, the scientific institutions should: […]

    o Improve the management of bottom trawling by further implementation of spatial based measures to protect Essential Fish Habitats (EFH), in terms of nursery and spawning area, and Vulnerable Marine Ecosystems (VMEs) extending the Fishery Restricted Areas (FRAs) existing in the Strait of Sicily also off the African coasts;

    o assess the possibility of a differential selectivity of the trawl net used to catch deep water rose shrimp (Parapenaeus longirostris) and hake (Merluccius merluccius) to maximize the catchability of the first one reducing the impact on the second one.

  - The MEDAC supports the opinion of the MEDAC scientific expert, about the areas to be further improved:

    o The political willing of the CPCs to reach the MAP objectives, based on i) precautionary approach, ii) MSY, iii) ecosystem approach, should be verified considering the different socio-economic state of riparian countries involved.

    o The improvement of information sharing – Additional effort should be devoted to enhancing sharing of information and results among all stakeholders at national and regional level.

    o Socio-economic assessment – Urgency of assessment studies on socio-economic impacts and implications of management measures adopted so far.

    o Monitoring, control, and surveillance – Urgency of the continuation and implementation of the international joint inspections carried out in an experimental way between 2018 and 2019."

- *"[…] and decided to continue measures to protect the European eel."*

  MEDAC Ref. 40/2022 (15 February) *"The MEDAC calls on the EC to introduce ad hoc ecosystem-based management approach for eels, as defined in the Marine Strategy Framework Directive (Directive 2008/56/EC), promoted by the Common Fisheries Policy (CFP) (Article 4.9) and the European Eel Regulation (EC1100/2007). The ecosystem approach involves the implementation of measures that address mortality factors other than fishing and a cross- sectoral management by DG MARE and DG ENV. This implies a real commitment from the EU and the Member States to implement measures aimed in particular at restoring ecological continuity, water quality and habitats, which has not been done in a sufficient and credible manner under the Water Framework Directive (WFD).[…] Finally, the MEDAC stresses that professional eel fishing has achieved the objectives set by the European Eel Regulation. The MEDAC advocates a status quo on the measures applied to the professional fishing sector, limiting them to the provisions already collected in the Eel Management Plans (EMPs) as long as the objectives of reducing the other mortality factors have not been reached.*

  The MEDAC recalls that any additional management measure on fishing, in addition to being inefficient in the absence of other measures on the other mortality factors, would have significant socio-economic implications for the European fishing and aquaculture sector."

- About the par. 4 Economic performance: Study in progress of the MEDAC WG5

The MEDAC WG5 on socio-economic aspects is analysing the available trends of the available socio-economic indicators from 2008 to 2019. The aim of this study is to highlight the effects of the management measures adopted in these years, considering the following EU Regulations:

- *Council Regulation (EC) No 1967/2006 concerning management measures for the sustainable exploitation of fishery resources in the Mediterranean Sea of 21 December 2006*
- *Common Fisheries Policy REG. (EU) No 1380/2013 OF THE EU PARLIAMENT AND OF THE COUNCIL of 11 December 2013*
- *Conservation of fisheries resources and the protection of marine ecosystems through technical measures REG. (EU) 2019/1241 OF THE EU PARLIAMENT AND OF THE COUNCIL of 20 June 2019*

And the available data and socio-economic indicators:

- Trend of total number of vessels
- Trend of active vessels per Med sub-region
- Trend of active vessels per country
- Percentage of inactive vessels on the total per country (%)
- Average age of vessels (years)
- Trend of fishing days in the MED Sea (days)
- Trend of fishing days per country
- Trend of catches per unit of effort (Kg/effort)
- Trend of landings value in the Med Sea (€)
- Landings value per country
- Employee costs
- Trend of the crew and FTE in the Med Sea (n. of people)
- Trend of number of FTE (Full Time Equivalent)
- Trend of the crew per country

The MEDAC WG5 on socioeconomic aspects shown the preliminary results of this analysis of the STECF socioeconomic data and highlighted the negative trend already in place since the beginning of CFP enforcement, in terms of serious reduction in the number of vessels, crew members, aging of the fleet and crews, reallocation of young people to other activity, etc (Source: STECF 21-08 - EU Fleet Economic and Transversal data fleet segment).

- About the par. 6.2 Setting fishing opportunities for different sea basins: Work in progress of the FG WMed

During the last FG on WestMED meeting it was agreed to evaluate the socioeconomic impact of the MAP WestMED after 3 years from its implementation. Moreover, it was underlined that the fuel crisis is already impacting fleets and significantly reducing the fishing effort. Therefore, the fishing opportunities setting should take into account the reduction already in place and the impact of the other management measures introduced in the MAP. It should be noted that the state of the resource is undergoing a favourable development which is strengthening over the most recent years. Indeed, the constructive dynamic of the Mediterranean profession has been producing its effects since 2020 and must be preserved, notably by guaranteeing the conditions for progressive implementation of the multiannual management plan for the Western Mediterranean.

About the TAC setting in the WestMED, the MEDAC highlights the results of the best scientific advice (STECF EWG 21-13)[7], where it has been observed that "more detailed scenarios on the implementation of TACs should

[7] Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of the fishing effort regime in the Western Mediterranean – part VI (STECF-21-13). Publications Office of the European Union, Luxembourg, 2021, EUR 28359 EN, ISBN 978-92-76- 43488-7, doi:10.2760/121901, JRC126965

be tested to obtain more robust results and that scenarios combining multiple management options should be built up in a way that would allow to discriminate the contribution of each single management option".

- About the par. 7 Conclusion:

"Beyond the state of fisheries resources, attention must also be given to the wider marine ecosystems. In that spirit, the Commission is preparing an Action Plan to conserve fisheries resources and protect marine ecosystems. It will aim at further protecting sensitive species and habitats, with measures supported by an improved knowledge base, enhancing synergies between fisheries and environmental stakeholders, and supporting the sector to ensure a fair and just transition."

MEDAC 18/2022 (2 February) "From this and from what has already been revealed on the contents of the Action Plan which the consultation focuses on, it is clear that targets and strategies will be included which aim to introduce further, progressive restrictions on bottom trawling, which could go as far as banning it, according to the request of certain stakeholders. Fishing using mobile bottom-contacting gears is the most wide-spread human activity impacting the seabed habitats, species and their environment. In Europe alone, 43% of the shelf/slope area and 79% of the coastal seabed is considered to be physically disturbed, mainly by bottom trawl[8]. Worldwide, bottom trawlers produce multiple direct and indirect impacts on benthic ecosystems[9], with considerable social and economic consequences. […]

It should be recalled that there is already a legal framework that governs the activities of bottom trawlers and link with the protection of habitats (deep-sea fishing regulation, EU habitat directive).

This framework does not allow bottom dragging gear activities to operate in sensitive areas or habitats. […]

The importance of bottom trawling from a productive, economic and social point of view is the reason behind the development of actions under the CFP to reduce and rationalise fishing effort, in view of the impact of the sector on stocks, and these efforts are slowly bearing fruit. They include multiannual management plans, reductions in fishing operations at sea, spatial and temporal closures and technical measures, while also spending a considerable amount in terms of EC budget resources on reducing the trawl fleet.[…]

This is not to say that bottom trawling has no impact on seabeds, nor that any such impact cannot be reduced by technical measures (size of otter boards, devices on the groundrope) or that spatial limits should not be placed on the use of these gears. Certain restrictions are already in place, such as depth limits (activities are permitted between depths of 50 and 1000 metres in the Mediterranean), and a ban on operations in Marine Protected Areas (MPAs) and Fisheries Restricted Areas (FRAs), on which the questionnaire includes queries as if it were still an option which is open.

Other technical measures could be introduced for the protection of sensitive habitats located at depths up to 1 000 metres.[…]

We do not see this as a question of banning an irreplaceable activity, it is necessary to carry on regulating it, minimising its impact and steering it to an acceptable level in the same way as other (equally irreplaceable) food products with a greater carbon footprint than the one supposedly attributed to bottom trawling[10], while continuing to explore other experimental strategies and projects that focus on the target of increasing the selectivity of fishing gears, together with potential co-management options. […]

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[8] European Commission. 2020a. Report from the commission to the European Parliament and the council on the implementation of the Marine Strategy Framework Directive (Directive 2008/56/EC) P16.

[9] González-Irusta, J. M., De la Torriente, A., and A. Serrano. 2018. Determining and mapping species sensitivity to trawling impacts: The Benthos Sensitivity Index to Trawling Operations (BESITO). ICES Journal of Marine Science, 75(5), pp1710-1721.

[10] "Bottom trawl fishing footprints on the world's continental shelves" https://www.pnas.org/content/pnas/115/43/E10275.full.pdf