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Ref.: 207/2020 Rome, 4 September 2020

MEDAC opinion on the MAP for Small Pelagic resources in the Adriatic Sea

Acknowledging that

the European Commission, taking into account the status of the small pelagic resources in the Adriatic, considering the need to the incoming expiration of the GFCM emergency measures to manage small pelagic in Adriatic, has opted to withdraw the EU proposal for a multiannual management plan for small pelagic resources in the Adriatic Sea (COM/2017/097 final - 2017/043 (COD);

the European Commission foresees to draft a GFCM recommendation to be tabled in the spring of 2021 in order to include Montenegro and Albania as well in the multiannual management plan for small pelagic resources in the Adriatic Sea;

the European Commission asked MEDAC to provide an opinion by 9th September 2020, so as to be in a position to consider the proposals made by the stakeholders that are represented in the framework of this Advisory Council;

during the WG1 meeting, held by videoconference on 8th July 2020, this subject was put on the agenda and to a series of relative issues was given further attention (to expand the already extensive discussions started since 2014), such as:

- the best resource management strategy between quota system (TACs) and fishing effort management system;
- joint or separate management of the two main stocks (Sardine and Anchovy);
- the impact on marine resources and ecosystems of other sources, such as pollution and climate change;
- the socio-economic aspects;
- the possible duration of the multiannual plan and the fight against Illegal, Unreported and Unregulated fisheries.

During the WG1, the fishing sector has repeatedly emphasised the difficulty in preparing an opinion in the absence of up-to-date scientific data on the state of the resources, which should have been improved by the application of the ongoing emergency measures, which have already led to a reduction in fishing effort (and a consequent) socio-economic impact. However, the MEDAC has repeatedly emphasised that absence of up-to-date scientific data is not good enough reason to provide an opinion based on the precautionary approach and using best available scientific data since even further reduction of fishing effort is needed.

Disclaimer - This opinion reflects only the MEDAC's view and the Commission is not responsible for any use that may be made of the information that it contains

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The MEDAC upholds the view that:

First and foremost, the future MAP for small pelagic resources in GSAs 17 and 18 must be based on the best available scientific data[1], robust and corroborated by the best scientific advice available, this analysis should be capable of highlighting the impact of the MAP year after year, not only on the resources but also on the economic sustainability of fisheries enterprises and on safeguarding jobs at adequate levels of remuneration.

The EC STECF and the GFCM SAC must align their research and provide annually a single evaluation of the status of the small pelagic stocks. Further, they should regularly assess the effects in biological and economic terms of all the emergency measures applied so far from a scientific perspective, at EC level and beyond, from 2013 onwards (because in some cases these measures have already caused fisheries enterprises to close, bringing about a further reduction in effort), and provide advice on the state of the stocks.

The EC STECF and the GFCM SAC should scientifically assess the encouraging signs on the state of resources that are emerging from evidences collected by the fishing sector.

The quota system does not adapt well to Adriatic nor to the type of resource[2] and it could be seen as a potential mechanism to create conflict between maritime districts and different *métiers* (pelagic trawl and purse seine), between Member States, especially considering the difficulty that the operators would have in implementing a quota for each single species. According to some MEDAC members the two species cannot be managed separately. They further believe that the fishing effort management system, which has been implemented so far through the various emergency measures, is more manageable and sustainable for the sector, once some data collection methodologies have been perfected and the benchmarks have been defined[3].

Furthermore, MEDAC is seeking reassurance that the EMFF support would be eligible for measures introduced by the GFCM and transposed into the EU legislation[4].

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[1] Birdlife, Legambiente, MedReAct, WWF and EAA support the following modifications to the sentence "**given the critical state of the small pelagic stocks in the Adriatic** first and foremost, the future MAP for small pelagic resources in GSAs 17 and 18 must be based on the best available scientific data **and precautionary approach**" and add "The sector is further committed to provide socioeconomic data that can contribute to assessment that is up-to-date".

[2] Birdlife, Legambiente, MedReAct, WWF and EAA support the following modification to the sentence: "With respect to quota system, there is no unanimity in the opinion."

[3] While Birdlife, Legambiente, MedReAct, WWF and EAA would rather support the introduction of a quota system.

[4] It is view of Birdlife, Legambiente, MedReAct, WWF and EAA that the EMFF should not finance harmful fishing subsidies and seek reassurance on this.

The duration of the MAPs needs to be long enough to allow for medium-term planning where possible investments by fisheries enterprises are concerned.

A common, shared position must be found for scientific research by the MS involved and procedures must be established to ensure at best real-time resource assessment, so that the management decisions that are made reflect the real situation of the stocks concerned as closely as possible.

The MAP will also have to take the fight against IUU fishing into due consideration, and adequate measures should be included to prevent any by-catch of vulnerable species, such as sharks, sea turtles and sea birds.

The MEDAC'S opinion greatly matches with the European Economic and Social Committee: "*Proposal for a Regulation of the European Parliament and of the Council establishing a multi-annual plan for small pelagic stocks in the Adriatic Sea and the fisheries exploiting those stocks [COM(2017) 97 final - 2017/0043 (COD*)]" (attached)[5].

[5] Birdlife, Legambiente, MedReAct, WWF and EAA disagree about the reference to Proposal of the European Economic and Social Committee.