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

Ref.:219/2019

Rome, 22 october 2019

Bernhard Freiss
Acting Director- General
DG for Maritime Affairs and Fisheries
European Commission

Dear Mr. Friess,

Thank you for providing MEDAC with such a detailed analysis on the status of the new Technical Measures Regulation with regard to recreational fishing (your letters ref. 6277189, 10 october 2019).

- The MEDAC will for sure take into account the new provisions when delivering an advice.

- We take note, that the **Minimum Conservation Reference Sizes (MCRSs)** seem not to apply *at all* to recreational fisheries from 14 August, due to the provisions in the new regulation. **The MEDAC may discuss and send an advice on that issue, but we would really appreciate your views on this issue in advance**. Furthermore, the CFP and related legislation require the EU to protect juveniles, however a number of MCRS as they are set in this regulation do not seem to serve this purpose as they are often set below the first spawning size (e.g. Sea bass 25 cm in the Mediterranean!). In some cases, they are not even set for many relevant species for recreational fisheries.

- The **Landing Obligation** has implications with the MCRS as well. This Regulation indeed, according to recent provisions[1], explicitly doesn't apply to the Western Waters, the North Sea, and the Baltic Sea. It would be helpful for the MEDAC if the Commission could clarify whether the landing obligation applies to recreational fisheries in the (Western) Mediterranean Sea.

- A review of recreational fishing gears allowed in the Mediterranean is necessary. MEDAC has already planned this issue within the Working Group on Recreational

[1] *Regulation (EU) 2019/472 of 19 March 2019* https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32019R0472

info@med-ac.eu
+39 06.46.65.21.12 T
+39 06.60.51.32.59 F

med-ac.eu
Via XX Settembre, 20
00187 Roma (Italy)

Co-funded by the European Union

Fisheries (WG4) in the working plan for 2020. We would appreciate if you could share your views on what is the best time for an advice in order to be more effective.

Yours sincerely,

Giampaolo Buonfiglio
MEDAC Chair

info@med-ac.eu
+39 06.46.65.21.12 T
+39 06.60.51.32.59 F

med-ac.eu
Via XX Settembre, 20
00187 Roma (Italy)

Co-funded by the European Union