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MEDAC OPINION ON THE INTERACTIONS BETWEEN RECREATIONAL (RF)AND SMALL-SCALE FISHERIES (SSF) IN THE MEDITERRANEAN WATERS

In view of the results obtained from the constructive exchange of views between the commercial and recreational fisheries sectors in the MEDAC during the meeting held on October 2014 in Split, the WG4 proposed that as a starting point the members of each of the two categories identify mutual conflicts/problems and develop in-depth recommendations for the Mediterranean waters. Unfortunately, only recreational fishing stakeholders provided their contributions, for this reasons the result document was rejected by the Executive Committee meeting held in Split on 20 April 2016. Nevertheless, RF considers that the information provided here may be very useful for a better management of coastal ecosystems in the Mediterranean, so the WG4 involved again commercial fisheries on this issue.

June 2016

During the second round of this job, some representatives of commercial sector and OCEANA provided very useful suggestions, while on some issues, mainly distance from shore of SSF netting and SSF catches registration, it is rather difficult to find a compromise (SSF has been very clear on this).

Furthermore, "RF as a stakeholder" has become a hot issue opposed – unanimously - by commercial sector. The Recreational Fishery sector believes that it is a misunderstanding about the meaning of "Recreational Fisheries as stakeholder": this means to involve RF in decisional process on resources management and on its own management, not in decisional process on small scale fisheries (or commercial) management.

Both sectors agree on the necessity to fight against illegal fishing practices and illegal sales of catches on black market because it is a transverse problem which can't be clearly ascribed to a sector or another.

Malta commercial fisheries representative arose the problem of an increasing number of commercial fishermen fishing from recreational fishing boat instead of commercial fisheries vessels, this makes harder to identify who is who, and it happens not only in Malta.

To be able to give a realistic picture of the conflicts between the 2 sectors, we decided to rename and rewrite the boxes in "point of view" avoiding to suggest any solution for which an external facilitator (or *super partes* decision maker) should be necessary.

Furthermore, we added a column named "agreement level" in which a light shows the chance of agreement between the two sectors on each issue, it is interesting to note that green and yellow lights are the majority if compared to the red light.

October 2016 (WG4 Ajaccio) :

The problem called "poaching" (agreement level green) has been added as the result of the debate within the WG4 after the presentation of this document.

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It has been highlighted that the lack of a clear definition of genuine recreational fisheries may cause most of the red light in the problem/point of view box. It is a common opinion among commercial sector that there is an "healthy" recreational sector which does not create any 'cohabitation' problem.

Furthermore it has been highlighted the necessity to recall, for the purpose of this document, the Recreational and Small Scale fisheries definitions available in EU legal text.

Small Scale Fisheries definition:

EC 508/2014 (EMFF) – Art.3:

(14) 'small–scale coastal fishing' means fishing carried out by fishing vessels of an overall length of less than 12 meters and not using towed fishing gear as listed in Table 3 of Annex I to Commission Regulation (EC) No 26/2004 (2); *[(2) Commission Regulation (EC) No 26/2004 of 30 December 2003 on the Community fishing fleet register (OJ L 5, 9.1.2004, p. 25)].*

Recreational Fisheries definition:

1. EC 1224/2009**:**

'recreational fisheries' means non-commercial fishing activities exploiting marine living aquatic resources for recreation, tourism or sport;

2. EC 1967/2006 Art. 2:

8) 'leisure fisheries' means fishing activities exploiting living aquatic resource for recreation or sport;

3. EC 199/2008 Art.2:

c) 'recreational fisheries' means non-commercial fishing activities exploiting living aquatic resources for recreation or sport.



GREEN: 100% agreement

YELLOW: agreement to some extent

RED: no agreement

PROBLEM	MEDITERRANEAN RECREATIONAL FISHERIES (RF) POINT OF VIEW	MEDITERRANEAN SMALL SCALE FISHERIES (SSF) POINT OF VIEW	AGREEMENT LEVEL
Trammel nets, long-lines and traps/pots **(passive gears)**	Passive gears (commercial or recreational) are allowed with no distance or depth restrictions from the coast (in some MS they can be dropped also at 0 metres distance from the shore/coastline), with a few exception in estuaries in some Countries. This may affect spawning grounds and euryhalines species and may have huge impact on inshore waters. This generates conflicts between SSF and RF (mainly fishing from shore). The use of passive gears by Mediterranean RF should be banned.	In many Med Countries the use of passive gears is allowed to recreational fisheries. This may affect spawning grounds and euryhalines species and may have huge impact on inshore waters. The use of this kind of gears by Mediterranean recreational fisheries generates conflicts with SSF.	

PROBLEM	MEDITERRANEAN RECREATIONAL FISHERIES (RF) POINT OF VIEW	MEDITERRANEAN SMALL SCALE FISHERIES (SSF) POINT OF VIEW	AGREEMENT LEVEL
Commercial and recreational fishing on spawning grounds targeting spawning fish	Some commercial and recreational fisheries target spawning aggregations of fish (ex: seiners targeting *Sparus aurata*, *Dentex dentex* or *Dicentrarchus labrax*) or hand lines or road and line targeting *Dentex dentex)*. This may cause great harm to ecosystems as big mature individuals, are caught easily in the most important and vulnerable period of their lives (reproduction).	Some recreational fisheries target spawning aggregations of fish (ex: longlines targeting *Sparus aurata*, *Dentex dentex* or *Dicentrarchus labrax*) or road and line targeting *Dentex dentex*. This may cause great harm to ecosystems and generate conflict with SSF.	

PROBLEM	MEDITERRANEAN RECREATIONAL FISHERIES (RF) POINT OF VIEW	MEDITERRANEAN SMALL SCALE FISHERIES (SSF) POINT OF VIEW	AGREEMENT LEVEL
Data Collection	SSF 50 kilos exemption to registration doesn't allow estimating fishing efforts on some coastal stocks. Not all the catches, but only those of valuable species should be recorded with no exception by RF and SSF. RF should be investigated and assessed with specific and proper instruments to know both: the fishing effort on some coastal stocks, and RF socio economic value for local communities.	Log book registration of each species caught without any exception is not possible. Some are open to evaluate some different kind of data collection about the 50 kilos exception RF fishing effort should be assessed. Nobody knows the amount of recreational catches. Not all the catches, but only those of valuable species should be recorded.	

Fisheries management	Decision makers and managers, often under "political" pressure by commercial fisheries and environmental NGOs, work only in SSF perspective and Mediterranean RF is often ignored or assimilated to illegal fisheries or to unregulated fisheries. Management plans are drown taking into account commercial fisheries sector only with, as a consequence, a "one leg" management plan which doesn't fit Mediterranean inshore water peculiarities. The existing RF regulation (at EU and MS level) should be improved in a more modern way which takes into account the more recent scientific advice and the social and economic value of the recreational fishing sector itself. Regulations often overprotect commercial fisheries (ex. priority of access to the resource in MPAs, RF must fish at a distance from SSF gears).	RF is not enough regulated and not controlled at all, while SSF is over regulated. The main feeling is that RF can do whatever it wants with no rules.	

PROBLEM	MEDITERRANEAN RECREATIONAL FISHERIES (RF) POINT OF VIEW	MEDITERRANEAN SMALL SCALE FISHERIES (SSF) POINT OF VIEW	AGREEMENT LEVEL
New very effective fishing techniques for highly vulnerable species	Some SSF adopt new very effective fishing techniques not or low regulated that may deplete the stocks of highly vulnerable species. Usually this is linked to spawning aggregations, ignorance of managers and really slow management measures.	Some RF adopt new very effective fishing techniques not or low regulated that may deplete the stocks of highly vulnerable species. Usually this is linked to spawning aggregations, ignorance of managers and really slow management measures.	
Unreported fishing sold in black market	This does not allow knowing the real impact of the activity. Moreover, this happens mainly with high value species, which are the most vulnerable and needed to know the state of the stock.	This does not allow knowing the real impact of the activity. Moreover, this happens mainly with high value species, which are the most vulnerable and needed to know the state of the stock. Unfair competition with commercial sector.	
Marine Protected Areas (MPAs)	MPAs are commonly being developed giving banning or highly restricting RF while giving priority access to SSF. This increases the conflict between SSF and RF.	SSF is strictly regulated and restricted in MPAs.	

PROBLEM	MEDITERRANEAN RECREATIONAL FISHERIES (RF) POINT OF VIEW	MEDITERRANEAN SMALL SCALE FISHERIES (SSF) POINT OF VIEW	AGREEMENT LEVEL
Fishing pressure (RF and SSF share same resources in the same area)	Some of the species fished by SSF are not so important for their economy as much as it is their impact on the stock; SSF impact on these species may have a huge impact on RF economy potential. So if the problem is well assessed and RF is involved in the resource management process the coastal communities and the fish stocks could benefits from both, SSF and RF in the area.	SSF should be given priority of exploitation of fishing resources because it is their business and their job.	
Use of recreational boat for commercial fisheries	Some commercial fishermen use recreational boat to fish for several reasons: to avoid control, during fishing closure, after retirement. These catches are sold.	Some commercial fishermen use recreational boat to fish for several reasons: to avoid control, during fishing closure, after retirement. These catches are sold.	
Poaching	There is a form of capture which is not recreational nor professional. The MEDAC WG4 call it “Poaching”. It lowers the image of sport and recreational fisheries and lower the quantity of fish available to leisure fisheries.	There is a form of capture which is not recreational nor professional. The MEDAC WG4 call it “Poaching”. It lowers the quantity of fish available to professional fisheries and trespass their commercial market (lowers their income).	

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