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Ref.:268 /2020

Rome, 13 November 2020

To Ms Charlina Vitcheva
Director General
Directorate-General for Maritime Affairs and Fisheries
European Commission

Subject: Reply to your Letter, your Ref. Ares(2020)5409681-12/10/2020

Dear Ms Vitcheva,

Thank you for your reply of 12 October 2020 asking for additional information on the mechanisms for an effort regime and how these could be implemented for managing small pelagic in the Adriatic sea. Let me use this opportunity to stress that MEDAC as an organization that represents the fisheries sector and other interest groups related to fishing industry is not competent to provide you with the exact scientific information such as sustainability reference points or relations of fishing mortality and fishing effort. Our opinion indeed takes into account scientific arguments but also tries to balance the potential impact on fisheries sector.
Although scientific experts consulted by the MEDAC support the management through TAC and quotas, because it can be more easily managed, assessed and controlled, **the Mediterranean Advisory Council confirms its own opinion on the MAP for Small Pelagic resources in the Adriatic Sea (Ref. 207/2020).** The reasons behind this statement are mainly due to the following relevant uncertainties still underpinning the related management measures to be included in the forthcoming MAP:

- the benchmark has not been still reached and the time series have some important shortcomings;
- the effects of the last emergency measures (Rec. GFCM/42/2018/8) have still not been assessed nor on the stocks nor on the socioeconomic aspects. This assessment can be relevant considering that the last measures are mainly based on fishing effort reduction, although a maximum total allowable catches has been fixed;
- there is still no one scientifically correct answer to the question on separated or mixed quotas on which to base management measures. Fishing gears cannot effectively distinguish between two species and during fishing operations for sure there will be mixing of the catch causing involuntary depletion of the stock;
- many factors are impacting the Adriatic Sea including plastic pollution, climate change and the consequent effect on temperature/salinity/nutrients, including alien species altering the food

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web. An ecosystem approach in assessing the stock fluctuation should be attempted before making management decisions.

Therefore, all these uncertainties can drive towards strong difficulties in implementation of TAC/quota system and finding an agreement between the coastal countries of the Adriatic Sea (EU and third countries)[1][2][3].

Currently, the management of these resources is carried out through the simultaneous application of the following measures:

1. MCRS for each species
2. Limit of fishing days for each species and total per year
3. Temporal closure up to 9 months of the coastal area within 6 miles (nursery area)
4. Fishing closure for 30 consecutive days for each species
5. Closed number of vessels authorized to fish for these species in the Adriatic
6. Reduction in the number of authorized boats by a two-year option for fishing small pelagic (Italian law only)

Excluding the first and last, all other measures can be modified in a restrictive way depending on the updated information on the state of the stocks[4].
Any changes will have to take into account the effects of further limitations on the economy of fishing companies, allowing for a multi-annual economic planning and not their closure.

Giampaolo Buonfiglio
Presidente

[1] Croatian fishery sector does acknowledge the theoretical benefits of such a system, but only for those stocks with solid and robust scientific assessment and in such circumstances where there is a level playing field in place across the entire area and for all the fleets concerned in terms of control, which at this moment is not the case in Adriatic. Therefore, the position of MEDAC is that the management framework should continue as it is, based on fishing effort management regime, with possible additional measures strengthening protection of both, resources and fleets.

[2] AgciAgrital, Federcoopesca and Legacoop highlight the need of a strong sharing action to allow an acceptable agrrement on TAC system.

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

[4] Birdlife, Legambiente, MedReAct, WWF and EAA add “The sector is further committed to provide socioeconomic data that can contribute to assessment that is up-to-date”