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

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MEDAC ADVICE ON THE
"Communication from the Commission to the European Parliament and the Council - Sustainable fishing in the EU: state of play and orientations for 2025"

During the MEDAC WG1 meeting held on 19 June 2024 in Athens, the analysis of the "Communication from the Commission to the European Parliament and the Council - Sustainable fishing in the EU: state of play and orientations for 2025" (FOs 2025) led the MEDAC members in agreeing on the following advice:

- It is needed a new approach for the data collection/processing in the Mediterranean to have more detailed and disaggregated data/results on fishing activities and the fleet as a basis for more tailored management measures for each GSAs. The example of GSA5 is meaningful considering the STECF results highlighting overfishing activities in the area, while the entire fleet is composed by 32 fishing vessels only.

- when fishing opportunities are settled, the related socioeconomic accompanying measures should be granted. This would recognize the value of fishing activities according to the Judgment of the Court (Fifth Chamber) on 11 January 2024 n. 330/2024, where it is recalled the Article 2 of CFP Regulation, entitled 'Objectives': "*The CFP shall ensure that fishing and aquaculture activities are environmentally sustainable in the long term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies*".

- par. 2, MEDAC appreciates that the European Commission began to consider the negative effects of climate change when fish stocks productivity is concerned. The adverse status of the stocks can no longer be attributed to excessive fishing effort only. It would be therefore necessary to correct the data on fishing effort and to readjust them in light of other ecological factors, with a view to 2025. Fishers should be consulted and included in the scientific studies and processes, as they could contribute with their local ecological knowledge and experience.

- par. 2.1 of FOs 2025, when the West Med MAP (2020-2024) is called for the first time as "*Transitional phase*", it reveals that the previous 4 years of implementation of management measures impacting on the entire value chain, including the reduction of 40% in fishing effort, have not produced the expected effects. It seems that without considering other factors other than fishing mortality (climate change, pollution, nutrients reduction etc.), reasonable results cannot be reached. Moreover, an additional reduction in fishing effort overcoming the 40% applied so far will drive the fishing fleet over the break-even point.

- the MEDAC deems appropriate to adopt the same considerations reported for the Baltic Sea, also in the case of Mediterranean: "*To overcome the effects of pollution, eutrophication and climate*

change on the marine ecosystems, fisheries and aquaculture, it is essential to start with input from the scientific community. Science enables policymakers to take informed decisions and to fully implement the ecosystem-based approach to fisheries and aquaculture management, one of the key principles of the CFP and the best way to meet its objectives".

- concerning the Adriatic Sea (Ref.:97/2024) "*MEDAC advice on the forthcoming MAP for the small pelagic in the Adriatic Sea": MEDAC deems needed to radically change the management approach for small pelagic fisheries. Moreover, despite the substantial reduction in fishing effort in recent years, official data collection shows that the quotas allocated in 2022 are not being met by any of the Member States concerned. There has thus been no positive response to a management approach that has been in place for several years. Moreover, some scientific evidence suggests that professional fishing activity is no longer to be considered the main cause of the decline in small pelagic stocks in the Mediterranean. Therefore, the scientific assessment on which management decisions are based should no longer focus exclusively on fishing effort, but it should have a holistic approach. A viable small pelagic fisheries management system should over time be able to ensure stability and economic and social sustainability of the fishery; so far this has not been the case. It is not a request for more fishing opportunities, but it is an alarm in response to a situation that seems to indicate that the current management system is not working properly*."

- par.3 of FOs 2025 "*State of the EU fleet*": The engine power should be measured with a methodology more appropriate for fishing activities, than that one of Merchant Navy. Moreover, fishing effort should be measured by fishing days. Fleet reduction in 2025 resulting from the scrapping of fishing vessels will have a major impact. In this sense, it should be considered when establishing FOs for 2025, by extending the "transitional phase" of WestMed management plan to evaluate in 2025 fleet reduction effects.

- par.5 of FOs 2025 *"Landing obligation":* The MEDAC started from the beginning the collaboration with both MSs and DG MARE in finding adaptive solutions through the JRs, and this process contributed to the draft of the current Delegated Regulations. Furthermore, as confirmed by the delegated Reg. (EU) 2020/4, STECF concluded that "*due to the small quantities and the very large number of landing places [...], the evidence indicated that the collection costs would be disproportionate*" then "*in light of the above, it is appropriate to apply the de minimis exemptions [...] until 31 December 2021*". This situation has not yet changed. However, acknowledging the important results of the multiannual collaboration, the MEDAC tried to fulfil the survey as much as possible on the online platform (the results of the questionnaire are also available in the annex), because the exemptions recognized by now avoided the strong socio-economic impact of the measure.

- par. 6, MEDAC supports the Commission statement on its commitment to work throughout the year to achieve progress on sharing arrangements for widely distributed stocks with third countries that lack such arrangements, to ensure shared stocks are fished in a sustainable manner. This is fundamental to have a level-playing field condition in the Mediterranean Sea, so that all Countries facing the area contribute to safeguard Mediterranean for the future of the fisheries sector and

comply equally with the international recommendations, as the Mediterranean makes us naturally interdependent. EU Fishing effort reductions cannot longer be accepted if these reductions are not equally shared with non-EU countries.

The MEDAC fully supports as a fundamental "*key stage to setting the next fishing opportunities that the Commission will take into account the findings of the judgment issued by the Court of Justice on 11 January 2024 in Case C-330/22*".

info@med-ac.eu
+39 06.46.65.21.12 T

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

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