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MEDAC ADVICE ON THE CONSULTATION ON THE CFP – evaluation

The MEDAC deemed appropriate to analyse the most updated working document[1] available on the CFP to cover all the relevant topics already addressed in the previous advice and contributions of the Advisory Council.

2.1. Ecosystem-based approach to fisheries management

The MEDAC started in 2016, in the Co-management Congress held in Catania, in analysing the ecosystem-based approach to fishery management. In fact, the members of the AC approved the importance of the adoption of this approach, as recognised by the GFCM 2030 strategy. Nowadays, it has not yet implemented, considering that the management measures are based on the fishing mortality (F) only. Moreover, it is essential the stakeholder's engagement in this scientific advisory process and taking account of the local knowledge of fishers and other stakeholders.

The MEDAC strongly support the statement of the Commission Staff Working Document (CSWD): *"Involving stakeholders and scientific experts in the different advisory and decision-making processes of the ecosystem-based approach to fisheries management can increase the credibility of the knowledge base, the legitimacy of the process, and the relevance of scientific input".*

Moreover, the CSWD states: "*However, the uncertainties brought by climate change call for a further and more systematic application of the precautionary approach to fisheries management. This means, for example, exploring more adaptive and flexible frameworks to fisheries management that can help address and contain potential future climate-driven shocks that would affect the status of commercial fish stocks in the short and medium term*."
The MEDAC strongly supports the adaptive and flexible framework to fisheries management, but when needed, the precautionary approach should be based on a deep analysis of the socioeconomic impact due to the more restrictive measures.

Moreover, the MEDAC fully agrees with the CSWD reporting "*the most recent European Climate, Infrastructure and Environment Executive Agency study*[2]*. "The study concludes that this will require a fundamental re-assessment of data needs as the current data are insufficient to calibrate and validate models needed to make a multispecies analysis". In the context of rapid global changes in both the climate and oceans, it is important to look beyond the dynamics of target stocks, or even predator-prey relationships. It is crucial to seek a better understanding of the overall ecosystem trends and to boost our understanding of the links to and impact of other areas of the sustainable*

[1] SWD(2023) 103 final COMMISSION STAFF WORKING DOCUMENT Common Fisheries Policy - State of play
[2] The implementation of ecosystem-based approaches applied to fisheries management under the CFP

blue economy (such as aquaculture, maritime spatial planning and other maritime sectors). This information should be used by decision makers when adopting harvest strategies".

The MEDAC agrees with the Study on regionalisation of the European Climate, Infrastructure and Environment Executive Agency. *This study sets the current approach to regionalisation and to stakeholder involvement against the achievement of the CFP objectives to implement an ecosystem-based approach and precautionary approach.* ***The study concludes that the contribution of these two approaches to support the achievement of the CFP objectives depends on the success in achieving both approaches in practice. The advisory councils comprise stakeholders with different knowledge domains and different interests which ultimately need to be balanced.***
Many stakeholders underlined the importance of including an ecosystem-based approach to fisheries management and decision-making*. Any ecosystem-based approach to fisheries management requires a more holistic fisheries governance framework that tackles the trade-offs between ecological, social (including cultural and institutional) and economic sustainability criteria*.

2.2. The economic dimension

The members of MEDAC deems that the EMFAF should provide more financial funds in attract the young fishers, for "scrapping" the fishing vessel and to support the ecological transition towards low-impact fishing. It is clear that the management measures adopted so far were mainly impacting on the fishing sector because only fishing mortality was considered, without a holistic view.

2.3. The social dimension

The MEDAC supports the CWSD explanation of the reasons behind the paramount importance of the fishery sector, especially in the Med: "*The CFP Regulation provides that the socioeconomic impact of fisheries management should be assessed along with environmental considerations when taking decisions. In the EU's blue economy, fishing is considered a relatively small economic sector, especially compared with coastal tourism and maritime transport. However, in several EU coastal communities and regions, the social importance of the fisheries sector outweighs its direct economic importance."*
Moreover, the new CFP should address the following issues: "The age of fishers, whether they are vessel owners or crew, is an important factor for fisheries. An intergenerational deficit in the fishing population can pose a risk to the economic and social sustainability of the sector. The age of the fishing population is also used as an indicator for a number of characteristics, including the attractiveness of the sector. In addition to ensuring the continuity of fishing activities, involving young people and achieving generational renewal gives the sector a better awareness of the challenges it faces, including sustainability issues such as climate change, pollution and the energy transition.
In order for the young to be attracted to the fisheries sector, they need to be able to make a living doing their jobs. It is difficult to imagine that a man with a family can actually live and survive with gross 36 euro a day, as was prescribed by the EU for a daily allowance during temporary fisheries

cessation period... The question arises whether the EU even wants to have fishermen and the fisheries sector?!?

To support generational renewal and preserve the cultural aspect of fisheries, the Commission is running a number of initiatives to increase the attractiveness of the profession. There are five main conditions to make the fishing sector more attractive:

- Fisheries and fleets must be managed sustainably. This brings a greater degree of economic stability, which lays the ground for long-term profitability.

- Fishing activities must lower their operational costs and be more efficient. Energy efficiency, decarbonisation, reducing fishing effort and gear selectivity are some of the key ways to reduce costs.

- There must be a high standard of safety and working conditions. Fishing can be a dangerous job, therefore providing good conditions for the crew is paramount.

- Competitiveness relies on skills. Adequately trained employees are better and more sustainability driven, healthier, safer fishers benefiting from competitive revenues and staying in employment longer. In particular, mastering digital tools is a key asset.

- The fishing sector and the seafood supply chain must improve their self-organisation. Producer organisations and inter-branch organisations play an essential role here."

The MEDAC supports the urgent need of shared standards for training courses for fishers involving the relevant stakeholders to tailor the new fisher in the Mediterranean (Ref. 59/2024) and the recognition of professional qualifications.

The Mediterranean Advisory Council has also been very active over the years and has worked on the role of women in fisheries (Ref. 262/2023) reflecting the considerations reported in the CWSD: "*Stakeholders, trade unions and Advisory Councils highlighted the* ***need to boost the role of women in the fisheries sector****. In local communities, women make an essential contribution to the generation of wealth and employment, as well as to the sustainable use and conservation of aquatic resources. Despite this, their contribution to fisheries and aquaculture is often not sufficiently recognised, preventing their full and balanced participation in the sector.*

From a governance point of view, a strong involvement of fishers in decision-making and ownership of the measures adopted are also a prerequisite for success. The regionalisation approach taken by the CFP, the empowerment of producer organisations under the Common Market Organisation Regulation and the role given to Advisory Councils are ways to achieve this involvement and ownership. Some Advisory Councils have social partners among their members, and they have actively promoted the social dimension of the CFP for some years."

2.4. Sustainable blue economy

2.4.3. Maritime spatial planning

The MEDAC letter (Ref.113/2024) and the consultation on the MSP completely support the considerations of the CWSD:

Coastal communities must be involved in the process and it should also factor in sea interactions*. Maritime spatial planning should take an ecosystem-based approach, as referred to in Article 1(3) of the Marine strategy framework directive (2008/56/EC), with the aim of ensuring that the*

collective pressure of all activities is kept within levels compatible with the achievement of good environmental status.

***The stakeholder consultation process (Annex 1)** showed that many stakeholders were concerned about the interaction between fisheries and other activities at sea. Maintaining a level playing field and creating synergies between activities are essential challenges to tackle in future discussions. Structured dialogues will be needed in this process in order to reach the set objectives.*

***The study on regionalisation highlighted that the current structure for stakeholder participation developed under the common fisheries policy works well in many regards**. This structure can be used by organisations participating in the tasks of the Advisory Councils as defined in Article 44 of the CFP Regulation for transboundary cooperation and regional stakeholder involvement in maritime spatial planning, which can be improved in this regard. The increased use made of areas of regional seas by other users than fishers (such as marine protected areas and renewable energy) demand a greater degree of regional alignment in maritime spatial planning, which currently is mostly carried out at Member State level.*

Considering the above, the MEDAC deems appropriate a systematic involvement of the AC in the MSP process.

2.5. Recreational fisheries

The MEDAC actively participated to the **regional plan of action for small-scale fishers in the Mediterranean** and the Black Sea adopted in 2018. The plan recognises interactions between small-scale and recreational fishing activities, encourages good cooperation, calls for strengthening the knowledge on their interactions and for improving monitoring and surveillance to avoid illegal, unreported and unregulated fishing. The plan is a political commitment setting out an ambitious roadmap until 2028.

Stakeholder involvement is of the essence and recreational fishing associations are active in multiple Advisory Councils. During the stakeholder consultation, recreational fishers themselves mentioned their wish to be included fully and fairly in the CFP, in order to reach its objectives and make informed decisions on the best use of fish resources in society. In this sense, the MEDAC suggested to fully include the recreational fishery in the multi annual management plans, in spatio-temporal terms.

Moreover, the MEDAC suggested to introduce a mandatory authorisation for Recreational Fisheries into European legislation of at sea throughout the Mediterranean basin (Ref. 62/2020).

2.6. A clean and healthy ocean

Concerning the Mission ‘Restore our Ocean and Waters by 2030” objective in the framework of the European Green Deal “protecting 30% of the EU’s sea area” the MEDAC stressed one more the following “considering the statutory mandate of Advisory Councils and recognizing the importance of ensuring a solid stakeholder engagement from the early stages of the process, the MEDAC candidates to be a hosting forum for the presentation and discussion to provide input to any new proposal to establish spatial measures in the Mediterranean that is of relevance to the EU fleet” (Ref. 103/2023).

By protecting the 30% of the sea surface to the fisheries, of which 10% with strict protection measures, it is extremely necessary to reduce the fleet capacity and eliminate overfishing in the countries and areas where this is needed; in order to get to the fisheries sector that can actually attract the young by making it possible for them to earn enough for a dignified living.

2.7. Climate change

In 2021, the Mediterranean Advisory Council also produced an opinion on the impact of climate change in the Mediterranean Sea basin, which was timely input into the discussions on the GFCM 2030 Strategy. The MEDAC fully supports the **flexible and adaptive fisheries management framework to build resilience to climate change** reported in the CWSD: "*To tackle the uncertainties and the challenges that climate change will bring, it is essential to build up the **resilience of marine ecosystems and of the fishing sector to enable both mitigation and adaptation.** Moving towards a flexible and adaptive fisheries management framework can contribute to this objective, and it must be guided by a solid scientific and evidence base. The CFP as a flexible policy lays the ground for such endeavours.*

*This implies the need for more research, science and data that provides for **dynamic assessment models** that regularly update biological/conservation reference points.*

*Since fish populations do not evolve in isolation and are part of an ecosystem that must also be resilient**, it is necessary to further integrate climate and ecosystem indicators in stock assessments, following the ecosystem-based approaches to fisheries management**. This means factoring in the need to anticipate and detect climate shocks and vulnerabilities along different trophic interactions. The targeted stakeholder consultation provided many clear solutions for adapting to a changing environment. The solutions included increasing the resilience of vulnerable ecosystems, shifting towards products with a lower carbon footprint and more flexibility and responsiveness in fisheries governance to adapt to changing conditions."*

The MEDAC suggests (*Ref. 69/2023*) a review of the current EU legislation in general, that provides obstacles to the utilisation, trade, removal methods and control measures is needed against the proliferation of the Non-Indigenous species (NIS). This should include a solid stakeholders' consultation. In light of the problem with the invasive lionfish in the Eastern Mediterranean, and following the example of the United States of America (and other countries of the American continent, that have an Atlantic border and the lionfish invasion problem), MEDAC suggests[3] a derogation in the case of the removal for the control of invasive species, such as lionfish, to Annex IX Part C, paragraph 7, of the Regulation (EU) 2019/1241 of the EP and of the Council of 20 June 201, that prohibits "to fish with spear guns if used in conjunction with underwater breathing apparatus (aqualung) or at night from sunset to dawn", providing that in order to limit the expansion of NIS species, such fishing activities may be authorised under the following exclusive conditions:

1) scientific research defining species, ranges and catch ceilings;
2) fishing activity carried out under strict control of the competent authorities;
3) presence of licence fishing authorisation.

[3] WWF and MedReAct cannot support the proposal to derogate such a regulation, exposing to an unacceptable risk of opening loopholes to the system. WWF and MedReAct would instead support any pilot or research on adaptations of conventional fishing gears to increase inter-species selectivity to target NIS. There might be a more efficient way to catch Lionfish for example, instead of targeting one at the time.

3. APPLYING THE CFP REGULATION

3.2.5. Western Mediterranean multiannual plan

The MEDAC (Ref. 108/2024) deems appropriate to wait the bio-ecological and socio-economic results before the adoption of new management decisions. Although, fishers already observed an improvement on the status of the marine resources, several key stocks remain heavily overfished. On the other side, without an updated socio-economic analysis of the MAP effects it is not possible to understand if and how many fishing vessels will be able to take advantage of the predicted slow growth of the stocks. […] In the next steps of the MAP more flexibility should be allowed in transferring the remaining quotas of effort when fish stock that have reached sustainable level in the following year, considering that some fishing days assigned to the MS become available in the last months of the year due to bureaucracy, when meteomarine conditions do not allow to use them. Some flexibility would permit to finish all the available effort allocated to the fleet and reduce the socio-economic impact of the West Med MAP.

3.3. Landing obligation

The MEDAC raised up the same concerns listed in the CWSD about the implementation of the landing obligation and the socioeconomic impact since the beginning (Ref. 129/2024): *"A recent study "Synthesis of the landing obligation measures and discard rates" concluded there was no evidence of changes to the discarding practice in fisheries and that discarding was still taking place. Stakeholders contributing to the study identified the main reasons for this: complex legislation, numerous exemptions in the various Commission delegated regulations and the substantial amount of work to be done on board due to the landing obligation.*

Participation of the fishers in further development of these tools are essential to the stakeholders' view.

Study "Synthesis of the landing obligation measures and discard rates for the Mediterranean and the Black Sea": In the study, respondents evaluated positively the amount of information and the means employed to inform about the features of the landing obligation implementation by Member States'- and control authorities to fishing operators.

European Parliament Initiative report "Securing the objectives of the landing obligation under Article 15 of the Common Fisheries Policy": emphasised the socioeconomic impact of the landing obligation on the industry, and the need for the Commission to evaluate the impact.

The CFP Regulation recognises the difficulty in implementing the landing obligation in mixed fisheries in which more than one species is present and where different species are likely to be caught in the same fishing operation. Stakeholders from the industry, trade unions and public authorities all mentioned in the stakeholder consultation carried out by DG MARE the complex difficulties with choke situations. Management decisions relating to maximum sustainable yield in mixed fisheries should factor in the difficulty of fishing all stocks in a mixed fishery at maximum sustainable yield at the same time, in particular where scientific advice indicates that it is very difficult to avoid the phenomenon of choke species by increasing the selectivity of the fishing gear- and methods used."[4]

[4] HGK states "The Regulation EU 2023/2842 considers it to be a serious infringement when the master of a vessel in mixed fisheries makes an error of more than 10% per individual species while reporting the estimated catch in relation

3.4. Scientific advice

The MEDAC fully agrees on the guiding principles for CFP management including decision-making based on best available scientific advice. When not enough data are available or the stock assessment is not really robust, according to the CFP the precautional approach has to be adopted driving to more restrictions to fishery activities. In these situations, special attention to socioeconomic impact should be dedicated to find the best compromise.

Moreover, the MEDAC deems appropriate the improvement listed in the CWSD "***A range of development needs have been identified to adjust the scientific advice currently provided to underpin action under the CFP***. *They include making it fit to respond to upcoming challenges such as the impacts of climate and ocean changes, increasing ecosystem considerations, and increasing calls for more transparency and stakeholder involvement in fisheries science and management.*

A strong recurrent message emerged from the recent stakeholder consultation organised to prepare the report on the functioning of the CFP, and during the recent DG MARE Science Seminar on an ecosystem-based approach to fisheries management. The message was a plea for greater stakeholder participation in the decision-making process, including on data collection, which could help improve implementation of the CFP. Moreover, fishers play a key role in enhancing environmental protection and should also be involved, since this role is often largely under-exploited. ***In addition, the approach of involving stakeholders in the scientific process would help build support, confidence and trust in the decision-making process.***

Another aspect to develop with respect to stakeholder involvement is providing greater transparency on the process of preparing and delivering scientific advice. While stakeholders are already involved in the scientific process, for example as observers in ICES and STECF work, there is scope to involve stakeholders' representatives in scientific meetings to actively bring in their views on and knowledge of specific aspects of the biology of the stocks concerned for which there can be a paucity of information (e.g. spatio-temporal distribution, predator-prey relations). ***This process can be facilitated by offering training to stakeholders on scientific processes (capacity building, for instance on the benefits and constraints of various stocks assessments methods, but also on the characteristics and key processes involved in implementing an ecosystem-based approach).***

A more effective dialogue between stakeholders, scientists and managers could be created by setting up a forum for regular exchanges to discuss science and management objectives to feed into both the scientific process and the decision-making process. ***Working together to develop a common research agenda should deepen the conversation between stakeholders, scientists and managers, and provide an opportunity to set up feedback mechanisms ensuring relationships are based on genuine and effective dialogue (and not parallel monologues)."***

3.5. Technical measures

The MEDAC supports the CWSD stating that "*to achieve the set aims (Maintaining or reducing FMSY, ensuring that fishing activities are highly selective, and minimising the impacts) a combination of effective technical conservation measures are needed (i.e. measures that regulate the operation and*

to the landed stock. This must not be an infringement, and especially not a serious infringement. This is an estimate, not an exact piece of data." MEDREACT does not agree with the HGK statement.

design of fishing gear, minimum conservation reference sizes and spatial/temporal closures), along with ***a greater commitment to these measures taken by the master of a fishing vessel****, as the decisions made by the fishers will have a direct effect on the long-term sustainability of the resource. Evidence (including the retrospective evaluation in the impact assessment) showed that* ***the format in which technical measures were developed had not achieved the objectives of the CFP effectively and several problems were identified.***

The Commission adopted the first report on implementation of the Technical Measures Regulation in September 2021. […] As outlined in the conclusions of the report, the Technical Measures Regulation and the current governance system are adequate and fit for purpose to achieve the objectives and targets set by the Regulation. As mentioned about the regionalisation, this approach gave a quantitative and qualitative boost to the participation of stakeholders in designing the measures with which they will have to comply. The report also showed the commitment of stakeholders to research and innovation, making use of the provisions of the regulation designed to boost the involvement of the sector.

However, challenges remain, and they need to be addressed […]. Regarding progress to protect juveniles and optimise exploitation patterns, it is essential that the fishing industry plays an active role and commits to implement more selective fishing.

3.6. Fishing opportunities

First of all, about the methodology behind the fishing opportunities allocation, the MEDAC reiterates the statement reported on the discussion paper (Ref. 115/2021) where it observed that the stock assessments and the associated management decisions in the Mediterranean were based on monospecific FMSY estimation, not considering trophic interactions among species, between different types of fishing gear and with the surrounding environment over time.

However, the MEDAC supports the CWSD where states: *"In 2009, the Green Paper* ***identified unclear and conflicting objectives of the previous CFP as a key structural failing****. No priority was set for these objectives and, though it makes direct references to adopting a precautionary and an ecosystem approach,* ***it is not clear how this relates to economic and social conditions****.*

The Green Paper also highlighted overcapacity as one of the policy's failings. It suggested that 'market instruments such as transferable rights …may be a more efficient and less expensive way to reduce overcapacity'. In 2011, the Commission proposed implementing a system of transferable fishing concessions at national level for all species under quota or effort limits."

Moreover, the MEDAC deems appropriate to pay special attention to the following CSWD considerations: *"The use of social criteria in allocating fishing opportunities was assessed in a STECF report on the social dimension of the CFP. […] The study emphasises that the use of social criteria in EU fisheries is a new area of study which makes an assessment challenging […]*

Stakeholders are of the opinion that allocation methods are not transparent and that environmental, economic and social criteria are not considered sufficiently when allocating fishing opportunities. *It is evident that transparency on the factors and criteria applied when allocating fishing opportunities can be further improved within and across all Member States."*

3.7. Emergency measures

The MEDAC recommends that in view of the serious impact that emergency measures may have also for operators, strict adherence to the requirements as set by the legislators is needed (CSWD).

3.8. Conservation measures necessary for complying with obligations under EU environmental legislation

About the conservation measures related to the EU environmental legislation the MEDAC underlined (Ref. 32/2023) that "the new environmental approach coming from the Action plan to protect and restore marine ecosystems for sustainable and resilient fisheries, through the increasing areas and restrictions in the MPAs poses a high risk of a significant impact on the fishery sector. This action plan, despite recognising an improvement of the protection of the seabed by the gradual elimination of mobile bottom fishing in all MPAs will produce structural changes, with social and economic impacts on operators and fishing communities throughout the entire supply chain.

However, the MEDAC supports the considerations reported in the CSWD: "*Under the CFP, the EU has a solid legislative framework that embeds environmental objectives and complements EU environmental legislation. […] As set out in the marine action plan, major steps have been made in recent years to better implement the environmental legislation and to strengthen the CFP's contribution thereto.*

Member States have clear responsibilities and obligations under EU environmental legislation. With the 2013 reform, the CFP clarifies the obligations of Member States to contribute to these obligations and provides tools to implement the fisheries measures needed to help meet them. ***In particular, the regionalisation approach in the CFP provides the basis for all stakeholders to work together to define and agree on the fisheries measures adapted to the local or regional context.***

Regionalisation has shown to be a good tool to adopt region-specific measures. *With the regional groups set up and cooperation underway in the regional sea basins, it has proven to be the most effective way to ensure the bottom-up transition from the political ambition to real implementation on the ground. The study on regionalisation concluded that regionalisation helps achieve the objective set out in Article 2(5)(j) of the CFP Regulation: to be coherent with other EU policies. Member States are empowered to take more initiative in developing measures to meet the objectives on fisheries and waters.* ***Together with Article 11, Article 18 of the CFP Regulation can facilitate transboundary cooperation between Member States and promote coherence with EU environmental policy."***

3.9. Management of fishing capacity

The MEDAC hihglights that the size of the EU fleet has been decreasing since 1996 due to progressing management policy, including subsidies for scrapping. **Moreover, in this section for the Mediterranean fleet the lack of generational turnover and the obsolescence of the fishing fleet has to be considered when the fishing capacity is assessed.**

So, the management decisions related to the fishing capacity should consider the socioeconomic aspects.

3.11. Regional cooperation on conservation measures – Regionalisation

The MEDAC agrees on the following points of improvement emerging from regionalization (CSWD):

- *The CFP Regulation recognises that dialogue with stakeholders has proven to be essential to achieve the CFP objectives*
- *while regionalisation is seen as an improvement to the system used before 2004, stakeholders agree that more work is needed to apply regionalisation in practice: […] This could be achieved by strengthening their capacity and improving engagement protocols, especially between Advisory Councils and Member States regional groups […]*
- ***The direct and close cooperation among different institutions (European Commission, Advisory Councils, scientists, Member States regional groups) is also seen as an advantage of regionalisation***
- *The range of joint recommendations already put forward demonstrates that regionalisation can be effective in and suitable for providing targeted and tailor-made technical measures.*

The MEDAC agrees on the fact that dissatisfaction raised up by some of the stakeholders on the regionalization can be reduced by "*consolidating the role of the Advisory Councils and setting up regional groups participating in the structure governing the regionalisation (process) and the management measures taken have influenced the attainment of the CFP policy objectives listed in Article 2 of the CFP Regulation since 2013" (CSWD).*

The CFP Regulation has recognised the importance of regionalisation, however the implementation of regionalisation is carried out based on the laws unified for the whole of the EU, instead of adopting a regional approach. The only way of managing fisheries at the EU level is through quotas allocated by species, and it is not the correct way to manage fisheries for all seas. The best example is provided by the small pelagic fisheries in the Adriatic sea, where the EU does not wish to accept the advice given by the stakeholders, including MEDAC, who have stated that the management of fisheries through separate quotas by species of anchovies and sardines will eventually lead to the destruction of the fisheries sector and of the very stocks of these two species. The scientific data based on which the quota allocations are calculated lag two years behind. The fishing quota will be determined in 2025 based on the data concerning the anchovies and sardines stocks status in 2023. And here we are dealing with short-lived species, according to certain scientific data the anchovies have a life span of only two years. All relevant scientific data and generally known scientific facts reveal that when the living conditions are favourable for anchovies, they aren't favourable for the sardine and viceversa. With this approach of introducing quotas by species, the EU will administratively destroy the stocks of sardines and anchovies in the Adriatic sea, along with their fisheries. Naturally, fishers will be the ones to blame…. The latest GFCM scientific bodies reports indicate that the management measures introduced so far have yielded results and progress has been registered as concerns the stocks recovery. Furthermore, with the measures introduced to date, the fisheries continues to survive. However, the EU does not wish to listen to the common fisheries policy and implement the regionalisation in the adequate regional way, adapting the management measures to the specific requirements and characteristics of individual areas.

3.12. Advisory Councils

The MEDAC fruitful collaborates with the EC and always provides its contribution when requested. In this sense, it agrees on the fact (CSWD) that "*these recommendations cover a very wide range of subjects and are essential for the CFP as they provide the Commission with the experience and knowledge needed. To improve transparency and give stakeholders feedback on their advice,* ***more visibility could be given to the work of the Advisory Councils*** *by systematically including references to the discussions held or recommendations received in new measures adopted. The Commission should also continue giving feedback on the role played by the Advisory Councils whenever possible, as it currently does in the staff working document accompanying the annual communication on fishing opportunities."*

The MEDAC reiterates the content of the letter on MSP (Ref. 113/2024) on the importance of the involvement of the stakeholders in the process of the MSP, considering what is stated in the CSWD: *"Given the many files under development in the fisheries and maritime domain, a future challenge for the Advisory Councils will be to carefully assess and prioritise their tasks. Another challenge might be* ***the need to engage with stakeholders competing for different uses of the sea****, including for energy production, extraction, tourism or conservation purposes and seeking to join the Advisory Councils as other interest groups in order to get involved in their tasks."*

3.13. External dimension

The MEDAC deems appropriate the efforts in reaching a level playing field in the Mediterranean in collaboration with the GFCM (Ref. 74/2024). Moreover, also in this context the continuous stakeholder's involvement is needed.