

## **MEDAC advice on Small Scale Fishery in relations to the future steps of the next CFP**

### **- Ecosystem-based approach to fisheries management**

- 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
- 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.
- 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.

### **- 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. In addition, alternative financing for fishing related activities and diversification should be prioritised. 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.
- To improve financing for SSF at organisational, association level for increasing participation in the existing EU ACs and other levels.

### **- The social dimension**

- In several EU coastal communities and regions, the social importance of the fisheries sector outweighs its direct economic importance and the impact of climate change.
- 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. 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 crucial to consider that ‘The Art of Small-Scale Fishing’ will be lost. With the problem of non-renewal of the workforce, knowledge is lost. Therefore, two ways to preserve both the tradition and skills are: the creation of museums to preserve the culture (currently financed under the FLAGS) and also creating SSF Academies where the knowledge is recorded, the local knowledge is documented, and young fishers are financed to be educated.
- 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, also considering the use of new electronic tools.

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- 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 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. For example, the training courses could actively involve as teachers both fishers with experience to share their know-how with young fishers, and in turn the young ones could be active to improve the knowledge on the use of electronic tools. These activities of knowledge sharing among generations could be financed by EU funds.
- 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.

#### - Sustainable blue economy

- Maritime spatial planning - Coastal communities must be involved in the process and it should also factor in sea interactions.
- Moreover, the MEDAC deems appropriate a systematic involvement of the AC in the MSP process.

#### - 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.
- All recreational stakeholders should be licenced and regarding certain stocks of commercial importance declaration of catches should be compulsory so as to add to the global picture of stocks assessment and quotas<sup>1</sup>.
- 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

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<sup>1</sup> MEDAC advice for a regulatory framework and efficient management for recreational fisheries in the Mediterranean based on “FAO Technical Guidelines on Responsible Recreational Fisheries”: “MEDAC members consider that EU should establish a legal framework for recreational fisheries that encompasses issues as rights and priorities, agents responsible for management, licensing requirements, fees and regulations.” (Ref.155/2016). MEDAC advice on the EU Proposal Rec.GFCM/44/2021/xx on minimum rules for sustainable recreational fishing activities in the Mediterranean Sea (GSAs 1 to 27) (Ref.39/2022)

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).

#### - Climate change

- To tackle the uncertainties and the challenges that climate change is bringing, it is essential to take into consideration the reality. The significant increase of the temperature of the sea (i.e. in Cyprus 30°C in summers) and the invasive species cannot be controlled, so an effective adaptation allowing the best and fastest use of these invasive species should be financed and supported.
- 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 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.
- Research funds into specific trials of selective gears must be made easily available for local groups of fishers to test, with scientific support, new gear types targeting NIS.
- 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<sup>2</sup> 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 2019, 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.

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<sup>2</sup> 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.

- The relevant markets have to be created to demand these climate change / invasive species that can be commercialised. Financial assistance and strategies must be created at EU level to promote these.
- Revised new Control Regulation**
- The operative constraints of SSF for the implementation of the revised new Control Regulation should be considered to support the sector in facing the new measures. First of all, the MEDAC highlights that the SSF vessels are not large enough to meet all the requirements of the regulation.
- Landing obligation**
- The reasons of the Mediterranean constraints and difficulties related to the LO implementation have been already provided in the past. 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". This situation has not yet changed.
  - SSF fishers are not included in the *de minimis* exemptions, which makes legality difficult, considering that the quantities to be landed are even smaller and the landing points are numerous compared to trawlers.
- Scientific advice**
- The approach of involving stakeholders in the scientific process would help build support, confidence and trust in the decision-making process.
  - Scientific advice post gear testing is needed.
  - 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)."
- Regional cooperation on conservation measures – Regionalisation**
- 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.



**- 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.

