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COMMISSION STAFF WORKING DOCUMENT
Accompanying the document

Report from the Commission to the European Parliament and the Council

**First report on the implementation of the Multiannual Plan for the fisheries exploiting
demersal stocks in the Western Mediterranean Sea**

{COM(2024) 322 final}

This staff working document provides more details about certain chapters of the report¹ on the implementation of the multiannual plan for the fisheries exploiting demersal stocks in the Western Mediterranean Sea (hereinafter the ‘plan’)², some information on control-related aspects and the detailed replies given in the stakeholder consultation.

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¹ COM(2024)322.

² Regulation (EU) 2019/1022 of the European Parliament and of the Council of 20 June 2019 establishing a multiannual plan for the fisheries exploiting demersal stocks in the western Mediterranean Sea and amending Regulation (EU) No 508/2014 (OJ L 172, 26.6.2019, p. 1).

1. Setting of fishing opportunities

During the transition period of the multiannual management plan for the demersal stocks in the Western Mediterranean Sea, fishing opportunities were set in five annual rounds (2020-2024), with the fifth currently being implemented. Since 2020, decisions on fishing opportunities have been increasingly supplemented by measures as scientific advice has become more comprehensive and there is a need to manage the state of different stocks.

Discussions with Member States and stakeholders have fed into the development of complementary measures alongside the main trawling effort regime in mixed fisheries. This section provides more details on the information provided in Chapter 2 of the report.

1.1. State of the stocks

Western Mediterranean demersal fisheries are composed of many species of fish and crustaceans, highly sought after by fishers due to their high commercial value. The Scientific, Technical and Economic Committee for Fisheries (STECF) provides best available scientific advice for the annual assessment of the state of the stocks as well as for the transition path to achieve fishing mortality securing maximum sustainable yield ('MSY') by 1 January 2025 at the latest. In its latest plenary report³, STECF presents the assessment of 20 Western Mediterranean demersal stocks based on data up to December 2022, except for some stocks in Italian waters where the MEDITS survey was not conducted in 2022.

STECF concluded that F_{msy} , the fishing mortality rate securing MSY, has decreased since the plan was adopted in 2019. The F/F_{msy} indicator shows a clear downward trend, both in the median as well as in the arithmetic mean. However, STECF concludes that there is still a substantial level of overfishing of stocks in the Western Mediterranean Sea, as reported in the high levels of F/F_{msy} in 2022 (around 2). It concludes that downward trend in F/F_{msy} has not resulted in a parallel increase in the biomass ratio, B/B_{msy} . STECF also highlights the discrepancy between stock sizes in Spanish-French waters and in Italian waters where the decrease in F/F_{msy} is more significant. However, STECF notes that two stocks, blue and red shrimp in Italian waters (ARA 8-9-10-11) and red mullet in the South and Central Tyrrhenian Sea (MUT 10), have not been covered by analytical assessments since 2021.

There is clear scientific evidence that **the plan has started to yield results**, as four out of the 14 stocks with an analytical assessment have a fishing mortality reaching MSY and five more are not far from having a fishing mortality reaching MSY. However, STECF concludes that more time is needed to observe whether there will be an increase in biomass as a response to the reduction in fishing pressure achieved by the plan. In particular for hake, STECF estimates it will take time before we see a full **recovery of biomass**, which could be achieved after several years of maintaining fishing mortality at reduced and sustainable levels.

Figures 1 and 2 below illustrate the STECF conclusions and present the trends in F/F_{msy} and B/B_{msy} by stock under the plan. Namely, blue and red shrimp (ARA), giant red shrimp (ARS),

³ 75 STECF Plenary report (STECF-PLN 24-01).

deep-water rose shrimp (DPS), hake (HKE), red mullet (MUT) and Norway lobster (NEP) in geographical areas (GSA): Northern Alboran Sea (1), Alboran Island (2), Balearic Islands (5), Northern Spain (6), Gulf of Lion (7), Corsica (8), Ligurian and Northern Tyrrhenian Seas (9), South and Central Tyrrhenian Sea (10) and Sardinia (12).

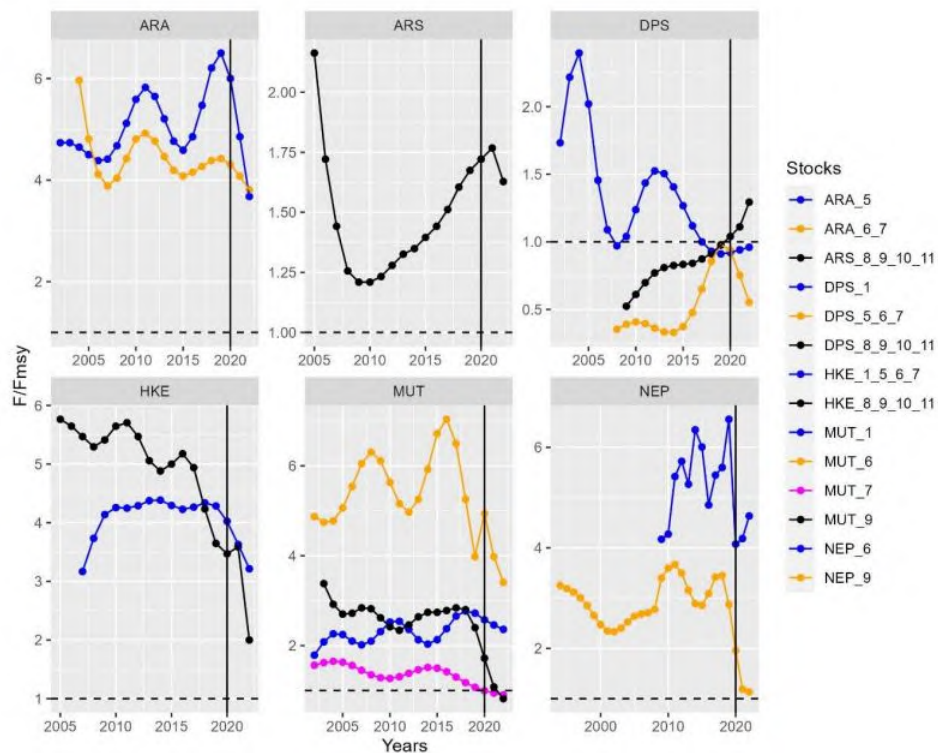


Figure 1: Trends in fishing mortality ratio F/F_{msy} of the 14 stocks analytically assessed. Stocks in GSA 8-9-10-11 are in black.

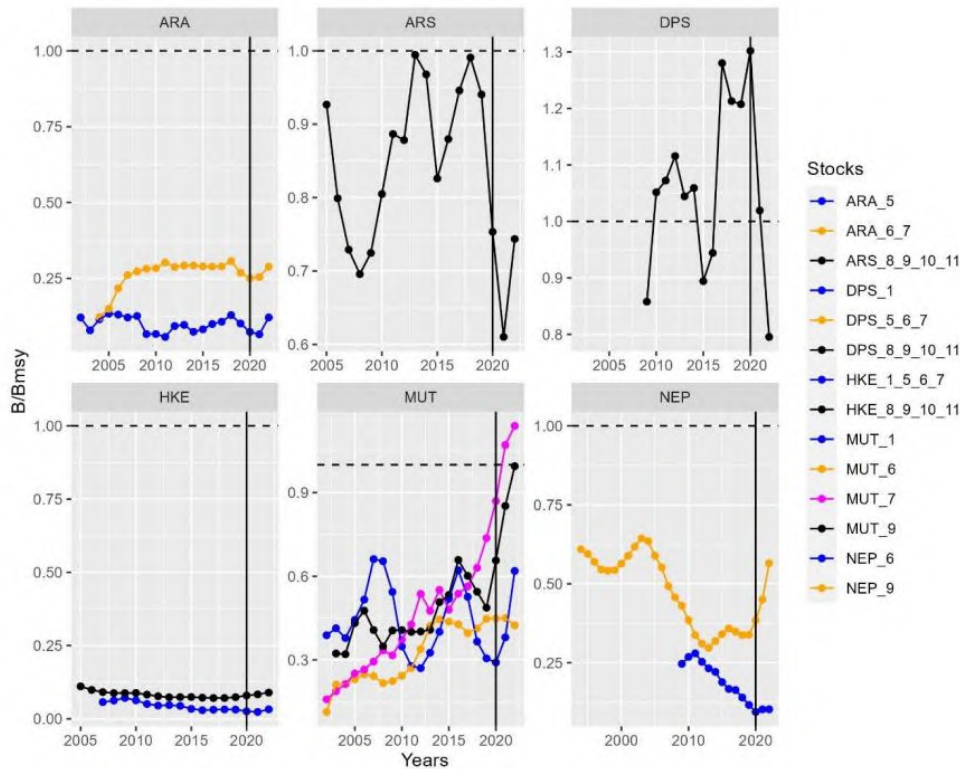


Figure 2: Trends in biomass ratio B/B_{msy} of 12 out of 14 stocks analytically assessed (DPS 1 and DPS 5-6-7 do not have a trend as B_{msy} is not estimated for these stocks). Stocks in GSA 8-9-10-11 are in black.

In more detail, STECF concludes that three of the four stocks with $F/F_{msy} \leq 1$ and/or $B/B_{msy} \geq 1$ (DPS 1, MUT 7, MUT 9) show an increasing biomass coupled with decreasing fishing mortality that had started prior to the plan implementation. STECF concludes that the results could be taken as evidence of the influence of the plan on relative biomass and the risk of overfishing. Despite the challenges of demonstrating the influence of factors such as the plan implementation, STECF highlights that the F/F_{msy} indicator decreased both before and after the plan was adopted.

STECF observes that currently four (DPS 1, DPS 5-6-7, MUT 7 and MUT 9) out of 14 stocks assessed analytically show a value of fishing mortality equal or below the reference level ($F/F_{msy} \leq 1$). Currently, two stocks (MUT 7 and MUT 9) show a corresponding biomass equal or above the reference threshold ($B/B_{msy} \geq 1$), but this indicator is not available for DPS 1 and DPS 5-6-7. Overall, the assessments indicate that seven out of 20 stocks can be considered fished close to a fishing mortality at MSY. Ten out of 20 stocks remain significantly overfished, including three stocks below B_{lim} (hake in GSA 1-2-5-6-7, hake in GSA 8-9-10-11 and nephrops in GSA 6) and four stocks below B_{pa} (red mullet in GSA 1, red mullet in GSA 6, blue and red shrimps in GSA 5 and blue and red shrimps in GSA 6-7). In addition, STECF experts were unable to estimate reference points to evaluate the status of six stocks against F_{msy} .

Lastly, STECF experts estimated the trends in biomass and the stock trajectories in terms of the ‘transition to Fmsy’, i.e. assessing annual fishing mortality levels in order to reach Fmsy in 2025 with equal and gradual steps between 2019 and 2024. This enables the experts to identify four stocks for which biomass is increasing. With continued management measures in 2024, those four stocks could have a fishing mortality close to Fmsy by 1 January 2025.

STECF observed that the median across stocks of the F/Fmsy values in 2022 is ~1.81, while the mean value is ~2.17, showing that fishing levels are still roughly twice sustainable levels across the assessed demersal species in the Western Mediterranean Sea. When comparing the two management units under the plan (Spanish-French waters and Italian waters) the median and mean values are higher (~2.61 and ~3.21) in Spanish-French waters than in Italian waters (~1.29 and ~1.37). STECF observes that both the median and mean B/Bmsy values across stocks in 2022 are ~0.49. The median and mean value are lower (~0.39 and ~0.28) in Spanish-French waters than in Italian waters (~0.74 and ~0.64).

STECF observed a downward trend in F/Fmsy, mainly driven by stocks in Italian waters. However, in both management units (Spanish-French waters and Italian waters) this trend started in 2019, one year before the plan was implemented. STECF notes that the downward trend in F/Fmsy is faster than the upward trend for biomass, even though median B/Bmsy in 2022 is the highest value of the time series (again driven by stocks in Italian waters). This may be due to biomass inertia to react to changes in fishing mortality, but the expected trend in biomass is also more variable than the trend in fishing mortality (F-trend) due to the impact of recruitment variation.

1.2. Trawling effort regime

During the detailed discussions of the plan adoption process, the main tool identified to tackle overfishing and achieve fishing mortality at Fmsy by 2025 at the latest has been the trawling effort regime. Following scientific advice and the legal obligation in Article 7(3) of the plan, the number of trawling days has been gradually reduced by 40% compared to the 2015-2017 baseline number. This has been adopted gradually in the annual process to set fishing opportunities in December Agrifish Councils. It has resulted in a progressive adaptation of the fleets to the plan measures and the sector has become familiar with more detailed monitoring following EU-standards. To achieve effective monitoring of the trawling fishing days, the plan sets out a range of monitoring, control and enforcement obligations by Member States, such as annual notification of authorised vessels and their activity at sea (e.g. fishing day duration, location in relation to closure areas).

In addition to a 40% reduction in trawling fishing days between 2020 and 2024 stipulated in the legal basis of the plan, several monitoring tools have been developed for the Western Mediterranean Sea since 2020. Conversion factors have been estimated and adopted at national level to secure fair transfers of fishing days between fleet segments targeting the same mix of species but with different levels of fishing efficiency. Following validation by STECF of conversion factors for transferring fishing days between fleet segments, there has not been any overshooting of effort trawling allocations between 2020 and 2023.

As the plan is the only EU multiannual management plan with the Fmsy deadline postponed to 2025 (Article 4(1) of the plan), the fishing opportunities set during the transition period from 2020 to 2024 did not have to be aligned to fishing mortality at Fmsy. However, the STECF made an annual assessment of the state of stocks and the estimated pace of transition for each stock under the plan to achieve fishing mortality at Fmsy by 2025 at the latest. In 2021, STECF looked at all the information available for each stock and reassessed the amount of fish in the sea, the fishing pressure and how far the stock was from being in a sustainable state. As the legal obligation was to bring fishing mortality of the stock to MSY by 2025 at the latest, STECF advised complementing the trawling effort regime with additional measures to help kickstart the recovery of most overfished stocks.

The trawling effort regime was therefore complemented from 2022 onwards by additional measures. Since 2022, the Commission has proposed a package approach combining all management tools, including catch limits for blue and red shrimp and giant red shrimp, freezing of the effort for longliners to specifically tackle the fishing mortality of hake spawners and a compensation mechanism to incentivise more sustainable practices. **The package approach ensures an efficient reduction in fishing mortality while minimising socio-economic impacts.** The complementary measures to the trawling effort regime are outlined below.

1.3. Longliner effort regime

Article 7(3) of the plan allows for a fishing effort regime⁴ in which the Council fixes the maximum allowable fishing effort each year and can complement it with *‘any other relevant technical or conservation measures adopted in accordance with Union legislation’*⁵.

Following STECF scientific advice and given the difficult situation of hake stocks, the Commission worked on complementing the main trawling effort regime in the plan with additional measures to specifically tackle the fishing mortality of the most overexploited stocks, such as hake. STECF showed that significant catches of hake spawners were caught by longliners, which had an impact on hake stock growth, hake stock health and the speed of recovery. To avoid undermining the objective of achieving maximum sustainable yield by 2025 for all demersal stocks, the Commission proposed specific measures for longliners as an addition to the main trawling effort regime. For the 2022 fishing opportunities regulation, the Commission proposed an effort regime for longliners to consolidate other management measures that aim to reduce fishing mortality of hake. The Commission has maintained its proposal of a ceiling of longliner effort in the fishing opportunities for 2023 and 2024. The Council followed the Commission proposal in 2022, 2023 and 2024 in adopting an effort regime for longliners.

⁴ Article 3(1) of the plan.

⁵ Article 7(3)(b) of the plan.

1.4. Catch limits for two shrimp species

As STECF advised in 2021 to complement the trawling effort regime with additional measures to help kickstart the recovery of the most overfished stocks, the Commission sought a balanced solution for the two shrimp species (blue and red shrimp and giant red shrimp), targeted by a selective single-species fishery, while proposing fishing opportunities to help rebuild the stocks and secure sufficient profitability for the fleet. Using Article 7 of the plan, for 2022 the Commission proposed a 13% reduction in the catch limit for blue and red shrimps in Spanish waters and 21% for both deep-water shrimp species in Italian waters to complement the reduction in trawling effort and the freeze in longliners effort. In line with the plan, the Council reduced the catch limits by 5% for all blue and red shrimp and giant red shrimp stocks as a complementary measure to the trawling effort reduction.

In 2021, STECF used for the first time in the Mediterranean Sea a methodology to estimate biomass reference points. This resulted in a fundamentally different picture for some stocks, as for three stocks, STECF assessed the amount of fish in the sea as being below the dangerous limit level, B_{lim} . STECF assessments in 2022 and 2023 included updates of the stock biomass reference points and confirmed the importance of taking additional measures to help support the recovery of the most overfished stocks.

For 2023 and 2024, the Commission proposed reducing catch limits ranging from 7% and 9% coupled with incentives stemming from a compensation mechanism that grants additional fishing days for vessels that adopt more sustainable practices, such as bigger mesh sizes for deep-water fisheries. The Commission made this proposal as STECF estimated that this would help rebuild the stock above B_{lim} by 2025 at the latest. In line with the plan, the Council set the catch limits at a level between 3% and 5% less than the catch limits set in previous years.

1.5. Compensation mechanism for trawlers

Past catch levels show that significant quantities of hake catches occurred in the Western Mediterranean Sea. Before the plan was adopted, STECF was able to quantify this phenomenon and evaluated different management options. These options had direct implications on the whole mixed fisheries in coastal areas of the Western Mediterranean Sea. The Commission discussed the implications of each management option with the Member States concerned during the plan adoption process. Based on these discussions and on best available scientific advice, the Commission developed, under the framework of the plan, a compensation mechanism to the trawling effort regime as an additional measure to complement and strengthen the management dynamics to help the recovery of stocks such as hake.

Following STECF assessments in 2021 on the state of hake stocks, the Commission encouraged the Western Mediterranean Member States to agree on a way forward to support the sector in developing more sustainable fishing practices. The Fishing Opportunities Regulation for 2022 adopted for the first time the compensation mechanism: a 2% additional trawling days for vessels demonstrating voluntary sustainable practices. The compensation

mechanism was further developed in the regulations for the following years, for 2023 (up to 3.5% for two criteria) and for 2024 (up to 6% for 3 criteria). The mechanism became a fully-fledged article with more criteria related to sustainable measures and allowing vessels to cumulate up to three criteria and the associated additional trawling days.

Based on best available scientific advice, the development of the compensation mechanism has led to the science-based fishing effort reduction for trawlers complemented by additional measures designed to kickstart stock recovery, in particular for hake stocks. Overall, it has seen excellent buy-in of the trawling fleet to adopt more sustainable measures such as efficient closure areas during spawning periods and more selective gear. Despite voting against the regulation, Spain started partly implementing the compensation mechanism in 2022. France focused on the criterion related to efficient closure areas since 2022. By contrast, Italy requested it for the first time in 2023 but the fleet did not use the additional days. Table 1 summarises implementation of the compensation mechanism since 2022.

Table 1a: Implementation of the compensation mechanism in 2024

Member State	Legal basis – Fishing opportunities 2024: Article 8	Number of eligible vessels	Additional days from the Compensation Mechanism	List of vessels for 2024
France	Article 8(1)(d) – temporary closures areas in order to reduce by at least 25% catches of juveniles of all demersal species or by at least 20% catches of spawners of all demersal species'	43 trawlers (21 trawlers between 18-24 m and 22 trawlers > 24 m) out of 48 authorised trawlers in 2024	570 additional days from the 4.5% compensation	47 trawlers 921 longliners
Italy	<i>No data transmitted</i>	-	-	656 trawlers 4 051 longliners
Spain	5% compensation mechanism, two criteria on a mandatory basis: <u>Article 8(g)</u> – closure period of at least 4 continuous weeks for fishing activities with trawlers in the areas and periods recognised as important for the protection of spawners of hake stocks. <u>Article 8(i)</u> - the Member State concerned has set a closure for	563 trawlers	6 116 additional days from a 5% compensation	588 trawlers 1 431 longliners

	<p>fishing activity with trawlers at a depth higher than 800 m</p> <p>Third additional measure, voluntary basis to be chosen by fleet vessels:</p> <p><u>Article 8(a)</u> - the use of a trawl net with 45mm square-mesh codend</p> <p><u>Article 8(b)</u> - the use of a trawl net with 50 mm square-mesh codend</p> <p><u>Article 8(k)</u> - the use of a trawl with flying or mid-waters doors or other doors which reduce the contact of the doors and the gear with the seabed</p>			
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Table 1b: Implementation of the compensation mechanism in 2023

Member State	Legal basis – Fishing opportunities 2023: Article 8	Number of eligible vessels	Additional days from the 3.5% Compensation Mechanism	Uptake of the additional days from the Compensation Mechanism	List of vessels for 2023
France	Article 8(4)(d) ‘The Member State	55 trawlers (26 trawlers between 18-	443 additional days	0 uptake due to permanent cessations	48 trawlers

	concerned has established temporary closure areas in order to reduce by at least 25% catches of juveniles of all demersal species or by at least 20% catches of spawners of all demersal species’.	24 m and 29 trawlers > 24 m) out of 56 authorised trawlers in 2023		of trawlers in the Gulf of Lion	1 143 longliners
Italy	Article 8(4)(d) ‘The Member State concerned has established temporary closure areas in order to reduce by at least 25% catches of juveniles of all demersal species or by at least 20% catches of spawners of all demersal species’.	640 eligible vessels	3 597 additional fishing days	0 uptake	695 trawlers 4 099 longliners
Spain	<u>Two criteria used:</u> <u>Article 8(4)(b)</u> ‘the vessel uses a trawl net with a 50 mm square-mesh codend for deep-water fisheries in order	<u>Under Article 8(4)(f):</u> 571 eligible vessels	<u>Under Article 8(4)(a) and (f):</u> 3 428 additional days	100% - all days were used	571 trawlers 1 455 longliners

	<p>to reduce by at least 25% catches of blue and red shrimps with a carapace length (CL) of less than 25 mm in geographical subareas 1, 2, 5, 6, 7, 8, 9, 10 and 11 and to reduce by at least 25% catches of giant red shrimp with a CL of less than 35 mm in the geographical subareas 8, 9, 10 and 11'</p> <p><u>Article 8(4)(f)</u> 'the Member State concerned has set a closure of at least four continuous weeks for fishing activities with trawlers in the areas and periods recognised as important, on the basis of the best available scientific advice, for the</p>	<p><u>Under Article 8(4)(b):</u> 22 eligible vessels</p>	<p><u>Under Article 8(4)(b):</u> 853 additional days</p> <p>In total: 4 281 additional days</p>		
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	protection of spawners of hake stocks. Such areas shall also account for spatial patterns of spawners' distribution, including depths from 150 m to 500 m. The periods of the temporary fishing closure shall be from February to March and from October to November.'				
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Table 1c: Implementation of the compensation mechanism in 2022

Member State	Legal basis – Fishing opportunities 2022: Annex III footnotes (2) and (3)	Number of eligible vessels	Additional days from the 2% Compensation Mechanism	Uptake of the additional days from the Compensation Mechanism	List of vessels for 2022
France	(d) State concerned must have adopted temporary closure areas in order to reduce by at least 25% the catches of juveniles of demersal species or at least 20% of catches of	57 vessels (26 trawlers between 18-24 m and 31 trawlers above 24 m)	114 additional days for the 56 trawlers and 139 additional days for the one above 24 m.	111 days consumed for the trawlers between 18 and 24 m.	62 trawlers 1 143 longliners

	spawners of all demersal species'				
Italy	<i>IT did not request it</i>				817 trawlers 1 758 longliners
Spain	<p>Two criteria used:</p> <p>b) 'vessels must use a trawl net with mesh size codend of 50 mm square mesh size for deep water fisheries in order to reduce by at least 25% of catches of blue and red shrimps [...] and to reduce by at least 25% catches of giant red shrimps [...]; or'</p> <p>d) 'the Member State concerned must have adopted temporary closure areas in order to reduce by at least 25% the catches of juveniles</p>	<p><u>Under criterion b):</u> 16 eligible vessels</p> <p><u>Under criterion d):</u> 24 eligible vessels</p>	<p><u>Under criterion b):</u> total of 50.7 additional days.</p> <p><u>Under criterion d):</u> total of 79.3 additional days.</p> <p>In total: 129.6 additional days in 2022</p>	100% - all additional days were used	579 trawlers 1 471 longliners

	of demersal species or at least 20% of catches of spawners of all demersal species.'				
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1.6. Court of justice judgment, case C-224/22

Two of the complementary measures in the package approach were preserved by the **ruling of the European Court of Justice** on the case *Spain v Council*, C-224/22⁶. On 16 November 2023, the Court of Justice issued its judgment dismissing the case for annulment brought by Spain against Council Regulation 2022/110 fixing fishing opportunities in the Mediterranean and Black Seas for 2022.

The judgment clarifies the Council's margin of discretion in setting catch limits during the transition period of the plan. The Court also accepted the arguments raised by the Council and supported by the Commission, defending a broad interpretation of the term 'significant catches' to cover catches that are significant not only from a purely quantitative perspective, but also looking at qualitative aspects.

1.7. Conclusion on the setting of fishing opportunities

Since its adoption in July 2019, the plan has been in a transition period of implementation. Between December 2019 and December 2023, fishing opportunities were set in five annual rounds, the latest exercise being ongoing, during which a total of 22 decisions were adopted (Table 2). In 2022, the fishing opportunities included supplementary decisions on the adoption of an effort regime for longliners, catch limits of two shrimp species and a compensation mechanism for trawlers. Since 2019, five decisions focused on the fishing effort regime for trawlers, combined with five decisions related to the compensation mechanism, three decisions on the fishing effort for longliners and nine decisions on catch limits of blue and red shrimp and giant red shrimp.

Being based on the latest scientific advice, the adoption of complementary measures has provided more flexibility in helping to reduce the fishing mortality rate of the most overfished stocks, while taking into account the transition pace of mixed fisheries.

Table 2: Summary of the decisions adopted in the fishing opportunities regulations

	FO2020	FO2021	FO2022	FO2023	FO2024	Total number of decisions
Reduction of trawling effort	-10%	Proposed - 15% Adopted -7.5%	Proposed - 7.5% Adopted -6%	Proposed - 7.5% Adopted -7%	Proposed & Adopted -9.5%	5

⁶ Case C-224/22: Action brought on 29 March 2022, *Kingdom of Spain v Council of the European Union*, OJ C 207, 23.5.2022, p. 20.

Longliner fishing effort			ceiling	ceiling	ceiling	3
Catch limits for blue and red shrimp and giant red shrimp			Ceiling adopted for the 3 stocks	Adopted - 5% and - 3% for 2 stocks	Adopted - 5% and - 3% for 2 stocks	9
Compensation mechanism			+2% (1 criterium)	+3.5% (1 criterium)	+4.5% (1 criterium), 5% (2 criteria) and 6% (3 criteria)	5
Total number of decisions	1	1	6	6	8	22

The Commission proposed reducing the fishing effort of trawlers following the scientific advice issued by STECF in order to achieve the legal obligation to reduce fishing days for demersal trawlers by up to 40% compared with the 2015-2017 baseline.

In addition, following scientific advice promoting more sustainable ways of fishing, the Commission proposed additional trawling days for fishing opportunities for 2022, 2023 and 2024 (respectively FO2022, FO2023, FO2024). It used a mechanism that compensates trawling vessels that adopt one or more sustainable criteria, such as more selective gear or respecting closure areas to protect juveniles and spawners.

The Commission proposed a fishing effort regime for longliners to step up monitoring and prevent any increase of the impact of longliners, in particular on the fishing mortality of hake spawners. This proposal was adopted in accordance with Article 7(5) of the plan and followed by the Council, apart from Spain who voted against.

Finally, the Commission proposed reducing three catch limits for shrimp species in the fishing opportunities for 2022 and onwards as complementary measures to the trawling effort regime to support the recovery of these stocks. This proposal was designed to help reduce fishing mortality in the two deep shrimp species (*Aristeus antennatus* and *Aristaeomorpha foliacea*) in very selective fisheries. This proposal was adopted in accordance with Article 7(3)b of the plan and followed by the Council, apart from Spain who voted against in 2021, 2022 and 2023 as well as from Italy in 2023.

From 1 January 2025, all articles in the plan will start applying. Specifically, for fish stocks with a data-rich assessment, the plan will set upper limits for annual fishing opportunities while enabling some **flexibility for healthy stocks** (e.g. Fmsy ranges). For stocks under pressure, which have so little fish in the sea that they are below dangerous minimum levels, it

creates a **safety net**. The safety net reduces fishing opportunities of stocks under pressure to a minimum and takes additional complementary or if necessary remedial measures to rebuild them.

2. Support from EU funds & socio-economic development

During its transition period, the plan postpones the achievement of the environmental objective in pursuit of socio-economic objectives. The objective is to progressively and incrementally achieve fishing mortality of all stocks at Fmsy by 2020, where possible, and by 1 January 2025 at the latest. By agreeing to postpone the deadline for achieving the Fmsy objective referred to in Article 4(1) of the plan for Western Mediterranean demersal stocks, the co-legislators took a specific decision to ensure that fishing activities are environmentally sustainable over the long term and are managed in a way that is consistent with the objectives of **achieving economic, social and employment benefits**.

This has also been the objective for the Commission in proposing and the Council in adopting a package approach that **takes into account the socio-economic pillar** in implementing the CFP Basic Regulation when fixing fishing opportunities.

In addition to the five-year transition for a progressive adaptation of the sector to a more sustainable management framework, the plan includes specific support from EU funds to tackle the imbalance in fleet capacity and to help the sector transition to more sustainable practices. For instance, in fisheries targeting blue and red shrimp and giant red shrimp that are further away from the coast and in deeper waters, the Commission highlighted the economic incentives to use EU funds in the energy transition. Member States can also support their fisheries local action groups to develop alternative economic activities and diversify the income of local communities that depend on fisheries. Small-scale coastal fishers are also eligible for higher support rates under many measures of the European Maritime Fisheries Fund (EMFF)⁷ and, since 2021, the European Maritime Fisheries and Aquaculture Fund (EMFAF)⁸. The EMFAF, running until 2027, is implemented under shared management, meaning that the Member States decide on which measures to focus the EU support.

Based on Member States' reporting, the Commission provides a yearly report on EU support for the sector, covering the end of the EMFF and the beginning of EMFAF implementation⁹.

⁷ Regulation (EU) 508/2014 of the European Parliament and of the Council of 15 May 2014 on the European Maritime and Fisheries Fund and repealing Council Regulations (EC) No 2328/2003, (EC) No 861/2006, (EC) No 1198/2006 and (EC) No 791/2007 and Regulation (EU) No 1255/2011 of the European Parliament and of the Council (OJ L 149, 20.5.2014, p. 1).

⁸ Regulation (EU) 2021/1139 of the European Parliament and of the Council of 7 July 2021 establishing the European Maritime, Fisheries and Aquaculture Fund and amending Regulation (EU) 2017/1004. OJ L 247, 13.7.2021, p. 1.

⁹ For the latest report, see [EMFF implementation report 2022 - European Commission \(europa.eu\)](https://ec.europa.eu/economy_finance/emff-implementation-report-2022).

3. Landing obligation

- State of play

The landing obligation came into force gradually, starting in 2015 and full implementation as of January 2019. The objective is to reduce the wasteful practice of discarding fish by giving fishers incentives to fish more selectively and avoid unwanted catches, ultimately avoiding wasting resources. With the introduction of the landing obligation, the fishing opportunities proposed must reflect the change from amount landed to amount caught. Discards may be very high in fisheries regulated by total allowable catches and quotas due, for example, to quota completion in mixed fisheries or high-grading. In these fisheries, the landing obligation represents a fundamental shift in the management approach to EU fisheries: from landing quota to catch-quota management, as all catches must now be recorded against the relevant quotas, to produce a significant reduction in fishing mortality.

Overall, scientific analyses by STECF¹⁰ and recent EU studies¹¹ show that, despite the landing obligation being in force for nearly ten years, there is little evidence of a change in behaviour or major improvements in selectivity in EU fisheries. The STECF scientists feel very much that the approach taken by Member States is to request exemptions to maintain the status quo.

In the Mediterranean Sea, the landing obligation entered fully into force on 1 January 2019. The landing obligation is implemented in a specific context where discards of regulated species are relatively low, the destination of landings of catches of fish under the minimum conservation reference size (MCRS) is limited and exclude sale for human consumption. These differences explain that the landing obligation has been implemented in the Mediterranean Sea mainly using flexibility instruments such as the *de minimis* and high survival exemptions. A recent study¹² estimated the discard ratios of the species included in the plan as generally low (0.15). The size at which 50% of the individuals are discarded (L50) for these species were usually below MCRS, however improvements were observed in many cases, showing that some progress has been made in discard patterns in the fisheries in this region.

The study also showed that discard ratios of the species under the Western Mediterranean multiannual management plan for demersal fisheries were generally low, with some increases recorded in 2018 and 2019 (e.g. hake in demersal trawlers in GSAs 5 and 9). Specifically, of the 18 species/fisheries combinations assessed, eight were above the MCRS in the most recent period with adequate data (usually 2018-19). In six more cases, increases were recorded, but the L50 values were still below MCRS. The L50 was lower than the MCRS and at the same time presented a downward trend in only two species (red mullet in GSA1 and hake in GSA 9). For the given species, the L50 of *Nephrops* was above MCRS in both GSAs with adequate

¹⁰ Evaluation of Joint Recommendations on the landing obligation and on Technical Measures Regulation (STECF-23-04 & 23-06). Publications Office of the European Union, Luxembourg, 2023.

¹¹ MedBLand, *Synthesis of the Landing Obligation Measures and Discard Rates for the Mediterranean and the Black Sea*, November 2021.

¹² MedBLand, *Synthesis of the Landing Obligation Measures and Discard Rates for the Mediterranean and the Black Sea*, November 2021.

data. For deep-water rose shrimp, it was above MCRS in two out of three GSAs that was estimated and for hake and red mullet, it was above MCRS in two GSAs each.

- Derogations

Before the entry into force of the plan, under Article 15(6) of the CFP Basic Regulation¹³, a high survivability exemption from the landing obligation was granted in 2018 for Norway lobster (*Nephrops norvegicus*) caught with all bottom trawls for a duration of three years.¹⁴ Regarding Norway lobster, the Member States concerned were to provide information in 2018 about estimated discard survivals, in particular in summer. The delegated act included a *de minimis* exemption for hake (*Merluccius merluccius*) and red mullet (*Mullus spp.*), up to a maximum of 7% for 2017 and 2018 and up to a maximum of 6% in 2019 of the total annual catches of these species by vessels using trawl nets.

Similarly, a first amendment in 2018 (EU 2018/153) included a *de minimis* exemption for hake and red mullet caught using bottom trawls. A second amendment in 2018 (EU 2018/2036¹⁵) granted a *de minimis* exemption for hake and mullet up to a maximum of 6% for 2019 and 2020, and up to a maximum of 5% in 2021 of total annual catches of those species by vessels using bottom trawls.

In addition, *de minimis* exemptions were adopted in 2018 for European seabass (*Dicentrarchus labrax*), annular seabream (*Diplodus annularis*), sharpnose seabream (*Diplodus puntazzo*), white seabream (*Diplodus sargus*), two-banded seabream (*Diplodus vulgaris*), groupers (*Epinephelus spp.*), striped seabream (*Lithognathus mormyrus*), Spanish seabream (*Pagellus acarne*), red seabream (*Pagellus bogaraveo*), common pandora (*Pagellus erythrinus*), common seabream (*Pagrus pagrus*), wreckfish (*Polyprion americanus*), common sole (*Solea solea*), gilthead seabream (*Sparus aurata*) and deep-water rose shrimp (*Parapenaeus longirostris*), up to a maximum of 5% in 2019 of the total annual catches of those species made by vessels using bottom trawls. The second amendment in 2018 also included *de minimis* exemptions for anchovy (*Engraulis encrasicolus*), sardine (*Sardina pilchardus*), mackerel (*Scomber spp.*) and horse mackerel (*Trachurus spp.*), up to a maximum of 5% in 2019 of total annual by-catches of those species by vessels using bottom trawl.

After the plan was adopted, STECF evaluated the exemptions under Article 15(5) of the CFP Basic Regulation on the ground of disproportionate costs for the *de minimis* derogations. New

¹³ Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy (OJ L 354, 28.12.2013, p. 22).

¹⁴ Commission Delegated Regulation (EU) 2018/153 of 23 October 2017 amending Delegated Regulation (EU) 2017/86 establishing a discard plan for certain demersal fisheries in the Mediterranean Sea. Followed by Commission Delegated Regulation (EU) 2021/2066 of 25 August 2021 supplementing Regulation (EU) 2019/1022 of the European Parliament and of the Council regarding details of implementation of the landing obligation for certain demersal stocks in the western Mediterranean Sea for the period 2022-2024.

¹⁵ Commission Delegated Regulation (EU) 2018/2036 of 18 October 2018 amending Delegated Regulation (EU) 2017/86 establishing a discard plan for certain demersal fisheries in the Mediterranean Sea. C/2018/6718 - OJ L 327, 21.12.2018, p. 27-40.

derogations were adopted in 2019¹⁶ for 2020 and some in 2021¹⁷ on the basis of joint recommendations. A *de minimis* exemption was adopted for 2020 and 2021 for European seabass (*Dicentrarchus labrax*), annular seabream (*Diplodus annularis*), sharpnose seabream (*Diplodus puntazzo*), white seabream (*Diplodus sargus*), two-banded seabream (*Diplodus vulgaris*), groupers (*Epinephelus spp.*), striped seabream (*Lithognathus mormyrus*), Spanish seabream (*Pagellus acarne*), red seabream (*Pagellus bogaraveo*), common pandora (*Pagellus erythrinus*), common seabream (*Pagrus pagrus*), wreckfish (*Polyprion americanus*), common sole (*Solea solea*), gilthead seabream (*Sparus aurata*) and deep-water rose shrimp (*Parapenaeus longirostris*), up to a maximum of 5% of total annual catches of those species made by vessels using bottom trawls.

STECF also estimated¹⁸ that discards of small pelagic species are negligible in the Western Mediterranean Sea since anchovy, sardine, mackerel and horse mackerel are not target species of the trawler fishery, and related by-catches are mostly landed, especially in targeted industrial demersal trawler fisheries. Discards by static coastal gears are also considered minor. A *de minimis* exemption was therefore adopted for 2020 and 2021 for anchovy (*Engraulis encrasicolus*), sardine (*Sardina pilchardus*), mackerel (*Scomber spp.*) and horse mackerel (*Trachurus spp.*), up to a maximum of 5% of total annual by-catches of those species by vessels using bottom trawls. In 2021, a high survivability derogation was adopted for Norway lobster (*Nephrops norvegicus*) caught with all bottom trawls and a *de minimis* exemption for hake (*Merluccius merluccius*) and mullet (*Mullus spp.*), up to a maximum of 5% for 2022 and 2023 of total annual catches of those species caught by vessels using bottom trawls.

Lastly, in 2021 a *de minimis* derogation was adopted for 2022 and 2023 for European seabass (*Dicentrarchus labrax*), annular seabream (*Diplodus annularis*), sharpnose seabream (*Diplodus puntazzo*), white seabream (*Diplodus sargus*), two-banded seabream (*Diplodus vulgaris*), groupers (*Epinephelus spp.*), striped seabream (*Lithognathus mormyrus*), Spanish seabream (*Pagellus acarne*), red seabream (*Pagellus bogaraveo*), common pandora (*Pagellus erythrinus*), common seabream (*Pagrus pagrus*), wreckfish (*Polyprion americanus*), common sole (*Solea solea*), gilthead seabream (*Sparus aurata*) and deep-water rose shrimp (*Parapenaeus longirostris*), up to a maximum of 5% of total annual catches of those species caught by vessels using bottom trawls.

In 2023, the Commission conducted a full review of the Western Mediterranean exemptions to assess the data collected since the landing obligation entered into force in the region and the selectivity improvements adopted. STECF assessed the joint recommendation and all the data provided by Western Mediterranean Member States. Based on Article 15(4)(b) of the CFP Basic Regulation, STECF confirmed that the scientific evidence demonstrated high

¹⁶ Commission Delegated Regulation (EU) 2020/4 of 29 August 2019 amending Delegated Regulation (EU) 2017/86 establishing a discard plan for certain demersal fisheries in the Mediterranean Sea. C/2019/6204 - OJ L 2, 6.1.2020, p. 5-10.

¹⁷ Commission Delegated Regulation (EU) 2021/2066 of 25 August 2021 supplementing Regulation (EU) 2019/1022 of the European Parliament and of the Council regarding details of implementation of the landing obligation for certain demersal stocks in the western Mediterranean Sea for the period 2022-2024. C/2021/6175 - OJ L 421, 26.11.2021, p. 17-21.

¹⁸ Evaluation of Joint Recommendations on the landing obligation and on Technical Measures Regulation (STECF-23-04 & 23-06). Publications Office of the European Union, Luxembourg, 2023.

survival rates in the Western Mediterranean Sea for scallop (*Pecten jacobaeus*) caught with mechanised dredges, carpet clams (*Veneupis spp.*) caught with mechanised dredges, red sea bream (*Pagellus bogaraveo*) caught with hooks and lines, lobster (*Homarus gammarus*) caught with nets and with pots and traps as well as crawfish (*Palinuridae*) caught with nets. A high survivability exemption¹⁹ was adopted for those species for 2024, 2025, 2026 and 2027.

Similarly, STECF evaluated the data available for *de minimis* exemption under Article 15(4)(c) of the CFP Basic Regulation and supported an exemption for 2024, 2025, 2026 and 2027 for hake (*Merluccius merluccius*) and mullet (*Mullus spp.*) up to a maximum of 5% of total annual catches of those species caught by vessels using bottom trawls; for hake and mullet up to a maximum of 1% of total annual catches of those species caught by vessels using gillnets and trammel nets; for European seabass (*Dicentrarchus labrax*), annular seabream (*Diplodus annularis*), sharpsnout seabream (*Diplodus puntazzo*), white seabream (*Diplodus sargus*), two-banded seabream (*Diplodus vulgaris*), groupers (*Epinephelus spp.*), striped seabream (*Lithognathus mormyrus*), Spanish seabream (*Pagellus acarne*), red seabream (*Pagellus bogaraveo*), common pandora (*Pagellus erythrinus*), common seabream (*Pagrus pagrus*), wreckfish (*Polyprion americanus*), common sole (*Solea solea*), gilthead seabream (*Sparus aurata*) and deep-water rose shrimp (*Parapenaeus longirostris*) up to a maximum of 5% of total annual catches of those species caught by vessels using bottom trawls; for European seabass, annular seabream, sharpsnout seabream, white seabream, two-banded seabream, groupers, striped seabream, Spanish seabream, red seabream, common pandora, common seabream, wreckfish, common sole and gilthead seabream up to a maximum of 3% of total annual catches of those species caught by vessels using gillnets and trammels nets; and for European seabass, annular seabream, sharpsnout seabream, white seabream, two-banded seabream, groupers, striped seabream, Spanish seabream, common pandora, common seabream, wreckfish, common sole and gilthead seabream up to a maximum of 1% of total annual catches of those species caught by vessels using hooks and lines.

For the other fisheries, the officially reported discards have been reduced to close to zero since the landing obligation entered into force. STECF however stresses that illegal discarding continues. Overall, STECF estimates that a majority of the estimated discards in weight are caught by active gears. Although the subsequent mortality rate cannot be quantified, STECF estimates it could be have been increasing. In conclusion, STECF reiterated one of the key issues associated with the landing obligation: the difficulty in assessing with precision the different levels of discarding in a context of mixed fisheries like Western Mediterranean trawlers.

- Technical measures to improve selectivity

Technical measures can contribute to reducing unwanted catches and therefore Article 18 of the plan also empowers the Commission to adopt delegated acts. However, unlike in other sea-basins, **no joint recommendation was submitted for the use of alternative or more**

¹⁹ Commission Delegated Regulation (EU) 2023/2462 of 22 August 2023 supplementing Regulation (EU) 2019/1022 of the European Parliament and of the Council by specifying details of the landing obligation for certain demersal stocks in the western Mediterranean Sea.

selective gears. Therefore, no delegated act was adopted. The Commission continues to suggest developing studies and to provide evidence on improved gear selectivity.

From a socio-economic perspective, most stakeholders agree on the need for more selective gear that reduces unwanted catches while keeping the catch per unit of effort (CPUE) for the wanted part of the catch as high as possible. Cooperation between Member States on developing and using selective gears has been reported as crucial in creating a level playing field for fishers.

4. Ecosystem-based approach

Under Article 2(3) of the CFP Basic Regulation, the CFP must implement the ecosystem-based approach to fisheries management to reduce the negative impacts of fishing activities on the marine ecosystem. Article 3(3) also provides that the plan must be coherent with EU environmental law and in particular with the objective of achieving good environmental status by 2020 as set out in the Marine Strategy Framework Directive 2008/56/EC (the ‘MSFD’).²⁰

Assessing the status of the Western Mediterranean Sea ecosystem and the plan’s impact on it is complex. The ecosystem has been in a difficult situation for decades due to overfishing, pollution and the consequences of climate change. The Western Mediterranean Sea is a subregion of the Mediterranean Sea, an atypical sea basin due to its geography and biology as a semi-enclosed, highly diverse and one of the most rapidly warming seas due to the consequences of climate change. While the scientific community is still investigating the impact of climate change on the region, it is expected that the increased upper ocean stratification and associated warmer and more saline surface waters will disrupt the Western Mediterranean natural processes of strong seasonal vertical stratification of the water column.

In addition, recent studies have identified changes in nutrient distribution in some areas of the Western Mediterranean Sea²¹. All this combined means a likely irreversible disruption of seasonal changes in productivity and species biology. It is this water column stratification that leads to a high diversity of fish species, allowing mixed fisheries to catch a wide range of species besides the six target species of the plan – hake, red mullet, nephrops, deep-water rose shrimp, blue and red shrimp and giant red shrimp.

In 1976, the coastal states signed the Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean Sea, known as the Barcelona Convention.²² The Barcelona Convention and its protocols form the legal framework of the Mediterranean Action Plan (approved in 1975), developed under the United Nations Environment Programme (UNEP) Regional Seas Programme. The key goal of the Barcelona

²⁰ Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for the community action in the field of marine environmental policy (OJ 164, 25.6.2008, p. 19).

²¹ Among others, Feuilloley G, Fromentin JM, Stemmann L, Demarcq H, Estournel C, Saraux C, *Concomitant changes in the environment and small pelagic fish community of the Gulf of Lion*, Progress in Oceanography, Volume 186, 2020.

²² [Barcelona Convention and Protocols | UNEP MAP](#)

Convention is to ‘*reduce pollution in the Mediterranean Sea and protect and improve the marine environment in the area, thereby contributing to its sustainable development*’. To implement the MSFD and restore the Mediterranean marine environment to good ecological status, EU Member States can support specific measures that pay special attention to eutrophication, biodiversity, hazardous substances and marine activities.

In order to determine good environmental status, the MSFD provides eleven qualitative descriptors. Article 3(3) of the plan also states that the plan must aim to ensure that the conditions of descriptor 3 are fulfilled, and to contribute to the fulfilment of other relevant descriptors in proportion to the relative role played by fisheries. It focuses on descriptor 3 because it is directly linked to fishing opportunities (and hence to the plan). It reads ‘*the populations of all commercially exploited fish and shellfish are within safe biological limits, exhibiting a population age and size distribution that is indicative of a healthy stock*’. Fishing activities have an impact on the descriptors relating to biological diversity (1), the food web (4), sea-floor integrity (6) and marine litter (10). The contribution made by fishing to the other descriptors is at best indirect and/or not substantial.²³

According to a recent study²⁴, the environmental status for the whole Mediterranean Sea was assessed as ‘moderate’. However, there were notable differences between ecoregions, with the Western Mediterranean Sea achieving ‘good’ status. Protected areas in the Western Mediterranean Sea mostly achieved ‘good’ or ‘high’ status. The no-trawl area was assessed as very effective and in a ‘high’ environmental status, while trawled control areas were ‘poor’ or ‘bad’.

One of the most important impacts of fisheries on marine ecosystem is the removal of predators and prey species from the food web and the disturbance of associated marine communities. Demersal fisheries are also linked with an abrasion of the seabed and with the risk of sensitive species by-catch. However, STECF and other internationally recognised scientific institutions have not fully quantified the effects of fisheries on the Western Mediterranean ecosystems.

Regarding descriptor 3, the latest STECF report on stock assessments in the Western Mediterranean Sea only looks at two of the three criteria for most stocks (biomass and fishing pressure); it lacks data on age and size distribution for all stocks targeted by the fisheries under the plan. STECF estimated that in 2023, red mullet in the Gulf of Lion (GSA 7) and red mullet in Ligurian and Northern Tyrrhenian Seas (GSA 9) were the only target stocks under the plan that met the two assessed criteria of descriptor 3. Deep-water rose shrimp in GSA 1 and GSAs 5-6-7 and Norway lobster in GSA 9 met only the fishing mortality criteria. Only limited data has been available on by-catch stocks under the plan and STECF could not

²³ Introduction of non-indigenous species (2), human-induced eutrophication (5), hydrographical conditions (7), level of contaminants in the sea (8), level of contaminants in fish and seafood (9), introduction of energy including underwater noise (11).

²⁴ Frascchetti, S., Fabbri, E., Tamburello, L., Uyarra, M. C., Micheli, F., Sala, E., Pipitone, C., Badalamenti, F., Bevilacqua, S., Boada, J., Cebrian, E., Ceccherelli, G., Chiantore, M., D’Anna, G., Di Franco, A., Farina, S., Giakoumi, S., Gissi, E., Guala, I., Guidetti, P., Katsanevakis, S., Manea, E., Montefalcone, M., Sini, M., Asnaghi, V., Calò, A., Di Lorenzo, M., Garrabou, J., Musco, L., Oprandi, A., Rilov, G., and Borja, A. (2022) An integrated assessment of the Good Environmental Status of Mediterranean Marine Protected Areas. *Journal of Environmental Management* 305: 114370.

conduct an assessment. The status of stocks not covered by the plan was unknown for most species (e.g. anglerfish spp.) except for the stock size of European eel, assessed as negative.

On Mediterranean ecosystems, ICES²⁵ has also been working to improve knowledge on functional biodiversity and its resilience and to integrate the concept of resilience into food web modelling. The conclusions provide clear insights to continue refining ecosystem-based tools (e.g. indicators and critical thresholds) to drive management and conservation measures.

ICES or STECF do not assess in detail the status of the other MSFD descriptors, but for some they provide qualitative indications. In the context of this report, which looks at implementation of the plan and not of the MSFD in the Western Mediterranean Sea, the following aspects should be noted regarding the other relevant descriptors. Fishing activities contribute to the challenge of maintaining biodiversity. ICES and STECF experts state, for example, that size-selective fishing may disrupt fish population stability, and fishing gear is a threat to endangered seabirds (e.g. Balearic shearwater), sea turtles and marine mammals. In many coastal areas, the increased abundance of invasive species such as blue crab and a concurrent decrease in piscivorous fish indicate that the ecosystem is deteriorating, though recently there have been some signs of improvement. Parasites and invasive species have been shown to impact fish stocks and can lead to lower productivity and changes in indigenous fish distribution, disrupting the predator-prey spatial overlap and food web functioning. Fisheries have a high impact on upper trophic levels, which cascade down the food web. In addition, bottom trawlers physically destroy and disturb seabed habitats, reducing the diversity and biomass there and changing habitat composition.

Secondary effects are the smothering and resuspension of sediments and nutrients, as well as food web effects. However it is not possible to quantify the impact of these effects due to a lack of studies and information on the thresholds of environmental impact. Abandoned, lost or discarded fishing gear is also an unsolved problem. The impact of abandoned fishing gear on the environment is also unquantified but fishing pressure is estimated to range from 20% of its usual net capacity after three months to a maximum of 6% after two years²⁶. Finally, although not fisheries-related, the presence of slowly degrading contaminants such as dioxins and polychlorinated biphenyls are of special concern for the fishing sector. It is related to the issue of trawlers re-suspending sediments in which those contaminants deposit and accumulate.

Conversely, the ecosystem also affects fish stocks, but ICES and STECF are not able to specify the relative contribution of each environmental factor on the fishing mortality rates. Due to climate change and its consequences on large-scale atmospheric processes, the average temperature in surface waters and the average salinity levels have increased²⁷. This could lead to considerable changes in the geographic distribution of fish stocks, and changes in their condition and productivity levels.

²⁵ ICES, 2023, Working Group on Comparative Ecosystem-based Analyses of Atlantic and Mediterranean marine systems (WGCOMEDA, outputs from 2022 meeting). ICES Scientific Reports 5:38, 48 pp. <https://doi.org/10.17895/ices.pub.22598164>.

²⁶ Gilman, E., Musyl, M., Suuronen, P. et al., *Highest risk abandoned, lost and discarded fishing gear*, Sci Rep 11, 7195 (2021). <https://doi.org/10.1038/s41598-021-86123-3>.

²⁷ *Observations in the Spanish Mediterranean Waters: A Review and Update of Results of 30-Year Monitoring*, J. Mar. Sci. Eng. 2023, 11(7), 1284.

The stakeholders consulted underlined the importance of ecosystem-based management of fisheries and the contribution of fisheries to achieving good environmental status. They also pointed out that non-fishery-related factors play an important role. Member States consider that fish stocks would probably be in a worse state without the plan. The Mediterranean Advisory Council is of the view that the plan has been counterproductive since it lacks provisions on how specifically to implement an ecosystem-based management of fisheries.

5. Control

In addition to the general provisions of the Control Regulation, (EC) No 1224/2009²⁸ and its recent revision by Regulation (EU) 2023/2842, the plan brought in specific provisions. These included a fishing effort regime for trawlers, established closure areas, restricted the daily and weekly trawling time and includes the possibility to manage recreational fisheries. However, it has taken time to develop an efficient control and enforcement of all plan measures and effort from control experts from both the Commission and Member State administrations.

In particular, work was carried out to achieve for all three Member States (i) reliable data crosschecking and effort allocation system in line with the plan; (ii) enforcement of fishing stops concerning breaches of the maximum allowable fishing effort; (iii) monitoring of compliance with closure area restrictions, notably for trawlers between 12-15 meters of length that are exempt from vessel monitoring system requirements and do not use an automatic identification system; and (iv) systematic monitoring of the daily and weekly trawling time limits set in the plan. In general, as in other sea-basins, the limited efficiency of Member States to monitor the obligation on land catches, the lack of a fully electronic system for catch reporting and poor control of engine power are considered to affect compliance with the CFP.

On control, the **stakeholders consulted** presented a wide range of opinions. Overall, they considered that the plan resulted in few specific control measures. Member States highlighted their work on improving their control system in the Western Mediterranean Sea by developing more modern tools such as VMS and e-logbooks on board more vessels. Some representatives of the sector called on the Commission to stop taking a blanket approach to control across all EU sea basins. Others highlighted the lack of compliance in closure areas and the need to improve training for control authorities and to step up controls in recreational fisheries. NGOs called for the use of VMS on all vessels to secure a level playing field between all vessels.

It is worth noting that all issues mentioned above had already been raised on numerous occasions, including in the public consultation on the evaluation of the Control Regulation.²⁹ The discussions held in this context also highlighted the need to tackle these issues at European level rather than regional level in order to avoid distorting competition.³⁰ In

²⁸ Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Union control system for ensuring compliance with the rules of the common fisheries policy (OJ L 343, 22.12.2009, p. 1).

²⁹ COM(2017) 192 final of 24 April 2017.

³⁰ SWD(2018) 280 final of 30 May 2018.

November 2023, the revision of the Control Regulation was adopted including measures to address those issues and modernise the fisheries control system ³¹.

6. Stakeholder consultation

To prepare this first report on implementation of the Western Mediterranean Sea multiannual plan, the European Commission carried out a targeted stakeholder consultation, as it did when it prepared the initial legislative proposal on the multiannual plan.³² The consultation was based on a questionnaire. The stakeholders consulted were the Mediterranean Sea Advisory Council (MedAC), the Western Mediterranean high-level regional group (PescaMed) and members of these two organisations. Several members of the PescaMed and MedAC groups also sent a contribution to the consultation which are reproduced in this document. In addition to its answers to the stakeholder consultation questionnaire, MedAC sent a separate detailed advice to the Commission³³.

This staff working document reproduces the content of the replies as received by the Commission. The first question in the questionnaire asks about the respondents' identity and is therefore not reproduced in this document. The replies from the Mediterranean Sea Advisory Council and the high-level regional group for the Western Mediterranean Sea are reproduced first followed by replies from the other organisations of the targeted stakeholder consultation. The replies received outside the targeted stakeholder consultation are reproduced last.

³¹ Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control.

³² COM(2018) 115 final.

³³ [110 letter from mare to medac pescamed on reply to west med map eu survey.pdf \(med-ac.eu\)](https://med-ac.eu/110-letter-from-mare-to-medac-pescamed-on-reply-to-west-med-map-eu-survey.pdf)

6.1. Mediterranean Sea Advisory Council

Section 1 – Progress made towards sustainable fishing levels

According to the MAP, MSY is to be achieved for all relevant stocks on a progressive, incremental basis by 2020 where possible, and by 1 January 2025 at the latest. All stocks covered by the MAP are managed by yearly fishing opportunities, including since 2022 catch limits for species of deep-water shrimps. Out of 20 stocks, 15 received an analytical assessment by STECF in 2022 of which 7 had estimated biomass above Bpa and 4 had estimated biomass below Blim. Out of the 20 West Med demersal stocks, 5 stocks were near MSY in 2020 and 7 stocks were near MSY as of 2022.

In your opinion

Q2: Has the existence of a MAP facilitated the process of setting of fishing opportunities for the relevant stocks?

Percentages of answers: significantly 6% - a little 19% - not much 19% - not at all 6% - no opinion 50%

Q3: To what extent has the MAP contributed to increasing the number of stocks at MSY?

Percentages of answers: significantly 31% - a little 50% - not much 6% - not at all 13%

Q4: Has the MAP helped in dealing with difficult cases such as European hake or other sensitive stocks?

Percentages of answers: significantly 44% - a little 38% - not much 6% - not at all 13%

Q5: Do you have specific management suggestions to address the specific case of European hake?

OP du Sud – France and UNACOMAR – Spain;

- The selectivity and the increase of the MCERS will have important consequences for the fleet.
- Further reductions are impossible to be implemented by the fishery sector.

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France and AGCI-AGRITAL – CONF COOPERATIVE FEDAGRIPESCA e LEGACOO AGROALIMENTARE – Italy:

- The Mediterranean sector notes the progress made in the number of stocks managed at MSY. It would seem necessary not only to take into account the pressure of fishing on the stocks but to adopt a global ecosystem-based approach which takes into account all the pressures on the marine environment (climate change, pollution, other marine activities, etc.) (UNACOMAR and UILAPESCA too).

- Regarding specific measures relating to hake, some Mediterranean fisheries concerned by the management plan are multi-specific. In this sense, the Mediterranean sector is opposed to the management method by TAC for stocks. More specifically for hake, the introduction of a TAC is not desirable given the proportion of hake catches, which may contribute to a risk of choke effect. (UNACOMAR and OP du SUD too)
- Furthermore, the increase in the minimum catch size for hake will lead to an increase in discards of undersized fish and could make the derogations established under the delegated acts incompatible (de minimis exemptions).
- Following the establishment of large spatio-temporal closure areas in the Gulf of Lion (6000km² over a total area of 12 000-13 000km²) to protect juveniles and adults of hake, which have demonstrated their effectiveness (Ifremer, Evaluation des fermetures spatio-temporelles mises en œuvre à partir du 1er janvier 2020 pour la pêche au chalut en mer Méditerranée, 2021), it seems impossible to agree to the closure of additional areas in French waters (UNACOMAR too).
- In addition, it seems impossible to absorb further reductions in fishing effort because they would jeopardise the sustainability of the enterprises while the fishing sector has made substantial efforts since the beginning of the management plan in 2020.
- Finally, the replenishment of biological stocks is a process that takes time. A study by Ifremer (Leforestier, S., Lehuta S., Mahévas, S., Jadaud, A., Vaz, S., 2020. Rapport du projet PECHALO (Pêche Chalutière Occitanie): Etude de l'impact de l'adaptation des stratégies de pêche et des navires de la flottille chalutière occitane pour améliorer leur viabilité et la durabilité de l'activité') has shown in particular that a period of two to three years is necessary to see the effect of the reduction in fishing effort by trawlers on the hake stock. (UNACOMAR, OP du SUD and EMPA too).

Federpesca – Italy:

- Implement a common policy in order to use a common process, but only apply it where it is needed, GSA by GSA.

FNCCP – Spain:

- It is necessary to continue to look for sustainability measures for trawling while maintaining the socioeconomic viability of the fishing sector and its local populations. In Catalunya trawling accounts for

approximately sixty per cent of the total catches in euro.

- The MSY achievement in 2025 is not possible, as recognised by the scientific institutes. It is necessary to establish a new Co-management Plan.

WWF:

- Once the effectiveness of Selectivity measures are proved to be effective, they should be mandatory.

Section 2 – Discards and landing obligation

On discards and the landing obligation, in your opinion

Q6: To what extent have discards been eliminated and the landing obligation actually been implemented?

Percentages of answers: a little 13% - not much 13% - not at all 19% - counterproductive 56%

Q7: To what extent has the MAP contributed to achieving the current situation, notably via discard plans and technical measures?

Percentages of answers: a little 19% - not much 31% - not at all 13% - no opinion 38%

Q8: To what extent do you support more selectivity measures?

Percentages of answers: significantly 13% - a little 19% - not much 6% - not at all 63%

Q9: if yes, which selectivity measures do you support specifically?

OP du Sud - France:

- Not support to further selectivity measures because they are socio-economically unsustainable for the fishing sector. (UNACOMAR too)
- Support to the spatial- temporal closures as the best management measure to improve selectivity.

AGCI-AGRITAL – CONFCOOPERATIVE FEDAGRIPECA and LEGACOOOP AGROALIMENTARE - Italy and CNPMM - CRPMM PACA - CRPMM OCCITANIE - CRPMM CORSE - France:

- The Mediterranean sector notes that the management plan has heightened interest in the topic of selectivity. However, some studies (Project IMPEMED and the Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of the fishing effort regime in the Western Mediterranean – part VI (STECF-21-13). Publications Office of the European Union, Luxembourg, 2021, EUR 28359 EN, ISBN 978-92-76-43488-7, doi:10.2760/121901, JRC126965) have shown strong unsustainable economic losses during a mesh change, with a loss of catches for stocks already close to the MSY (mullet for example) in some cases or stocks which are not affected by the management plan (UNACOMAR too). Furthermore, they demonstrated that the effectiveness of increasing selectivity is strongly

related to the species, the depth range and the area where fishing takes place. It should be recalled that some Member States have opted for selectivity via the establishment of spatio-temporal closures, by closing access to fisheries to certain areas at key times for the biological cycle of species.

- Regarding the landing obligation, the dogmatic application of Article 15 in the context of mixed fisheries remains impossible without serious socio-economic consequences on the fisheries concerned (UNACOMAR too).

EMPA – Spain:

- Time to the measures already taken is needed. It is counterproductive to continuously take measures without checking the results of those already taken, leading to the confusion of not knowing for sure which ones are effective (UNACOMAR too).

UNACOMAR – Spain:

- It is important, in addition to continuing to study the 45 and 50 mm meshes, to continue investigating the use of flying trawl doors, which avoid contact with the seabed, with all the advantages that this measure has, in addition to significant savings in fuel and a reduction in carbon emissions.

Federpesca – Italy:

- Selectivity measures should be indicated, evaluated and agreed upon through monitoring, verification between the fishers operating in the area and the research institutes, maintaining a balance of the parties in the evaluations.

FNCCP – Spain:

- It is necessary to find the balance between the sustainability of the fishing resource and the survival of the fishers and other agents in the circuit of the commercialisation of fish and seafood. A program should be established based on the scientific method of trial and error, in the implementation of technical measures, step by step. It is also necessary to apply the measures in each territory, the principle of territorialisation has been lost in the application of the rules, what is good in one place may not be positive in another.

WWF:

- T90/grids on bottom trawling.

Section 3 – Ecosystem-based approach

Q10: To what extent has the objective of implementing an ecosystem-based approach to fisheries management, and notably of achieving good environmental status, been achieved?

Significantly. Percentages of answers: significantly 38% - a little 25% - not much 31% - counterproductive 6%

Q11: To what extent have the closure areas contributed to the current situation?

Percentages of answers: significantly 56% - a little 38% - not at all 6%

Q12: To what extent has the MAP contributed to the current situation?

Percentages of answers: significantly 38% - a little 50% - not much 13%

Q13: do you have specific comments on this point?

OP du Sud - France

- The spatio-temporal closures adopted in France had effective results in the ecosystem situation.

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE, France and AGCI-AGRITAL – CONF COOPERATIVE FEDAGRIPESCA e LEGACOOOP AGROALIMENTARE, Italy and UNACOMAR, Spain:

- The successive reduction in fishing effort by trawlers during the management plan has had a very negative impact on the profitability of companies and the economic performance of fleets (STECF – Stock Assessments: demersal stocks in the western Mediterranean Sea. (STECF-22-09). Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/00380JRC132120; Arrêté du 28 avril 2022 relatif à la mise en œuvre d'un plan de sortie de flotte pour les navires pêchant au moyen d'un chalut dans le cadre du plan de gestion pluriannuel en faveur de la conservation et de l'exploitation durable des stocks démersaux en Méditerranée en zone CGPM 37.GSA7), thus jeopardising the continuation of their activity, particularly in a context of increased fuel prices as observed in 2021 and Covid19. In this context, a plan for the withdrawal of fishing vessels from the fleet was implemented by France (Arrêté du 28 avril 2022 relatif à la mise en œuvre d'un plan de sortie de flotte pour les navires pêchant au moyen d'un chalut dans le cadre du plan de gestion pluriannuel en faveur de la conservation et de l'exploitation durable des stocks démersaux en Méditerranée en zone CGPM 37.GSA7), for which a third of the French trawler fleet of the GSA7 subscribed. Impacts on supplies to fish auctions and fish markets are to be expected with landing losses estimated at nearly 1 300 tonnes for more than €6 million for the Occitanie fish auctions.

- In Italy the last withdrawal of fishing vessels from the fleet was done by 31/12/2017, according to regulation 508/2014: at that time, the European Commission was convinced that the demolition would no longer take place.

- The various scenarios of the STECF (Evaluation of the fishing effort regime in the Western Mediterranean – part VI (STECF-21-13), Evaluation of the fishing effort and catch regime for demersal fisheries in the western Mediterranean Sea – PART IX (STECF-22-11), STECF – 69th Plenary Report (PLEN-22-01), STECF – Evaluation of fishing effort regime in the Western Mediterranean – part V (STECF-20-13)) have also demonstrated a significant negative economic impact for trawlers in the short and medium term with a reduction in their gross added value. This is why STECF suggested in its last report (STECF-22-11) to conduct a detailed impact assessment for the further implementation of the management plan in order

to calculate possible scenarios (including mitigation and adaptation measures possible) regarding the implementation of effort reduction and the possible economic performance of the fishing fleets. It should be remembered that the fishing fleet is structural for the fishing industry in the Mediterranean (fish auctions, wholesalers, cooperatives, fishmongers). Therefore, this reduction in the effort quota weakens the entire sector on the Mediterranean coast.

- Concerning the closure areas more specifically, France has defined two spatio-temporal closures in the Gulf of Lion in accordance with Article 11 of the management plan - one of 3 368 km² for eight months, the other of 3 468 km² for six months – to meet the objectives of protecting juvenile and spawning hake. These two areas represent 49% of the area exploited in the Gulf of Lion and a significant part of French activity. It should be recalled the demonstrated effectiveness of these spatio-temporal closures (Ifremer, Evaluation des fermetures spatio-temporelles mises en œuvre à partir du 1er janvier 2020 pour la pêche au chalut en mer Méditerranée, 2021) and the strengthening of management measures in the GFCM FRA area of the Gulf of Lion in 2021 (Recommendation GFCM/44/2021/5).

EMPA – Spain:

- Good environmental status does not depend exclusively on fisheries management.

Federpesca – Italy

- The nursery areas have effectively contributed to an ecosystem approach to fisheries management. We now need to move on to phase 2: the involvement of fishers as guardians of the nursery areas with appropriate training courses.

- It should be deepening the knowledge of the current state of play and of various factors, such as logistics of the area, number and characteristics of vessels, local customs, and traditions.

Section 4 – Control and enforcement

Q14: To what extent have the specific provisions laid down in the MAP allowed the national competent authorities to ensure compliance with the MAP itself?

Percentages of answers: significantly 25% - not much 13% - no opinion 63%

Q15: Are there specific control measures that contributed substantially to improve compliance?

Coldiretti – Italy:

- Control of the mesh size of the nets

UNACOMAR – Spain:

- Reducing available working days is not an appropriate measure. But, in any case, new reductions can no longer be applied, since the fishing micro-enterprises are working below the break-even point.

- No new control measures are needed. The fishers are the guardians of the sea. And they are the ones who have a real interest in ensuring that the sea and natural resources are in the best conditions.

Federpesca – Italy:

- Control measures are especially those implemented on the trawling and floating trawl fishing, through the compulsory AIS. At least 30% of the vessels are exempt, and a good 20% not manage well the measures.

Q16: Are there specific control measures that have instead not contributed to improve compliance?

Coldiretti – Italy:

- Landing obligation

EMPA – Spain:

- No

UNACOMAR – Spain:

- New reductions can no longer be applied, since the fishing micro-enterprises are working below the break-even point.

Federpesca – Italy:

- Those control measures that are not applied due to exemptions in favour of certain categories that are thus able to fish in nursery areas and do not monitor harvested production.

Q17: Are there specific control measure(s) missing in the MAP or in the Control Regulation which would improve compliance with the MAP?

UNACOMAR and EMPA - Spain

- No, there is not needed to implement more specific control measures.

Federpesca – Italy:

- Improvement and facilitation of current electronic control procedures for all professional and recreational fishing vessels.

- Rewarding conditions related to turnover and not to tonnage or engine power.

- It also should be better the training in the sector of control authorities.

WWF:

- VMS on all vessels.

Section 5 – Regional cooperation

Q18: To what extent has the MAP in your opinion strengthened regional cooperation, including with stakeholders?

Percentages of answers: significantly 6% - a little 75% - not much 6% - not at all 13%

Q19: Do you have specific comments on this point?

OP du Sud – France, EMPA and UNACOMAR - Spain:

- Strengthened collaboration and communication among the Italian, French, and Spanish fishing sector representatives.

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France
AGCI-AGRITAL – CONF COOPERATIVE FEDAGRIPESCA and LEGACOOOP

AGROALIMENTARE – Italy and UNACOMAR - Spain:

- The management plan is a regulatory framework allowing Member States to put in place regional measures. The Mediterranean sector thus participates actively in the MEDAC which provide advice on the joint recommendations. Likewise, the Mediterranean sector works closely with its administrations on these issues. From this experience, the Mediterranean sector emphasises the importance of fluid and regular communication aimed at strengthening collaboration between actors.

UNACOMAR – Spain:

- The EC should pay more attention to the MEDAC advice and contributions, considering its valuable work.

Federpesca - Italy

- The role of FLAGs should be prioritised.

WWF

- Consultation at national level is weak in some cases.

Section 6 – Socio-economic impact

Regarding the socio-economic impact of the MAP, in your opinion

Q20: Given the Covid and the fuel crises, has the overall socio-economic situation of the fisheries sector improved since the entry into force of the MAP?

Percentages of answers: a little 6% - not much 6% - not at all 75% - counterproductive 6% - no opinion 6%

Q21: Given the Covid and the fuel crises, do you see a positive correlation between the implementation of the MAP and the socio-economic situation of the fisheries sector?

Percentages of answers: a little 13% - not much 13% - not at all 56% - counterproductive 13% - no opinion 6%

Section 7 – Overall assessment

Q22: What is your overall assessment of the western Mediterranean MAP?

Percentages of answers: beneficial 6% - neutral 19% - negative 50% - very negative 19% - no opinion 6%

Q23: Do you have final comments?

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE – France - AGCI-AGRITAL – CONF COOPERATIVE FEDAGRIPESCA e LEGACOOOP AGROALIMENTARE - Italy:

- The format of the consultation does not allow a proper answer on certain aspect of the MAP (OP du SUD too)
- The collaboration of fishery sector in the Med has positive effects, however factors other than fishing pressure should be further studied (pollution, demographic pressure, climate change, invasive species, etc.)
- It is necessary to take into account the three pillars of sustainability in order to guarantee fishing activities that are environmentally, socially and economically sustainable (EMPA, UNACOMAR too).
- It seems important to implement scientific resource to improve means of knowledge in the Med (assessment of stocks, evaluation of other anthropogenic factors, etc.) and to evaluate the impacts of management measures on the fishing resource and fishing activities. (OP du SUD and EMPA too)

OP du Sud – France:

- Improvement of the stock status of red mullet in GSA7 has been noted.
- However the fast implementation of the MAP and the complexity of the current economic period due to the fuel crisis and COVID consequences are having a strong impact on the fishing fleet with a great reduction of fishing vessels (UNACOMAR and Federpesca too).

EMPA – Spain:

- There is no economic sector that can resist a 40% reduction in its production (Federpesca too).
- Overlapping of continuous and different measures (selectivity, area closures, techniques,...) for the same objectives, which do not allow to identify which are effective and which are not (FNCCP too).

UNACOMAR – Spain:

- the Food Sovereignty and Food Security in EU is hampered by the current restrictive measures, because the new restrictions are several and applied in a short timeframe (5 years): the food supply is provided by third countries without the EU regulation (FNCCP too).
- Study and analysis of all measures is required before their application. And after its application, it is also necessary to study and analyse its effects. And for all this it is necessary to have enough time.

Federpesca – Italy:

- The fishing sector should have an essential role in the policy decisions to be taken for the West Med MAP.

- It's time to take decisions, because otherwise the fishing sector will disappear in few years.

FNCCP – Spain:

- the implementation of the MAP caused the economic unsustainability of the sector and the consequent lack of generation turnover.

6.2. Western Mediterranean High-level group (PescaMed)

Section 1 – Progress made towards sustainable fishing levels

According to the MAP, MSY is to be achieved for all relevant stocks on a progressive, incremental basis by 2020 where possible, and by 1 January 2025 at the latest. All stocks covered by the MAP are managed by yearly fishing opportunities, including since 2022 catch limits for species of deep-water shrimps. Out of 20 stocks, 15 received an analytical assessment by STECF in 2022 of which 7 had estimated biomass above Bpa and 4 had estimated biomass below Blim. Out of the 20 West Med demersal stocks, 5 stocks were near MSY in 2020 and 7 stocks were near MSY as of 2022.

In your opinion

Q2: Has the existence of a MAP facilitated the process of setting of fishing opportunities for the relevant stocks?

A little.

Q3: To what extent has the MAP contributed to increasing the number of stocks at MSY?

A little.

Q4: Has the MAP helped in dealing with difficult cases such as European hake or other sensitive stocks?

A little.

Q5: Do you have specific management suggestions to address the specific case of European hake?

The effects of the implementation of the West Med MAP have not yet been felt, as more time is needed to see the results at a longer term since fishing mortality is being reduced, due to the biological response of the stocks, and will reduce the pressure on the resource. Moreover, the profession is facing numerous crises since the implementation of the management plan: Covid crisis, fuel crisis, conflicts of use on the occupation of space (deployment of offshore wind farms in particular). It has been shown that vessels are struggling or just reaching their break-even point, putting them in a complicated economic situation, not allowing them to make new investments. If another reduction were to be implemented, this would put the owners of the remaining vessels in a critical financial situation.

SPAIN points out that selectivity should be enough incentivised with additional fishing days, since reduction of fishing days is already a measure with short margin of effectiveness and important implications at the socioeconomic level.

For the Gulf of Lion, FRANCE points out that it is worth noting the lack of knowledge on most stocks and on its functioning. For example, only 8 stocks are analysed out of the 274 landed. For the remainder of the management plan, in particular for hake, an ecosystem

approach seems essential in order to give the most accurate account possible of the situation. More specifically in the case of hake, closed areas have been set up to protect the juveniles and breeders of this species, as well as the spawning and nursery areas. These closed areas cover a large part of the Gulf and have proved their effectiveness by reducing catches of juvenile hake by more than 50%. Moreover, increasing the minimum size would lead to an increase in discards and increasing mesh sizes would lead to an unsustainable economic loss for the industry.

ITALY points out that compensation mechanism should be more ambitious in order to take over the reluctance of the fishermen.

Section 2 – Discards and landing obligation

On discards and the landing obligation, in your opinion

Q6: To what extent have discards been eliminated and the landing obligation actually been implemented?

Counterproductive.

Q7: To what extent has the MAP contributed to achieving the current situation, notably via discard plans and technical measures?

Not much.

Q8: To what extent do you support more selectivity measures?

See detailed answer in next question.

Q9: if yes, which selectivity measures do you support specifically?

Regarding selectivity measures, the three Member States involved have different views, according to their fleet management strategies. On this regard, different answers for the prior question ‘to what extent do you support more selectivity measures?’ are indicated below:

For SPAIN the answer would be ‘Significantly’, but with sufficient incentive for fishing industry to address the loss of catches at short and medium term. SPAIN would support a reasonable increase in mesh size at economic level for fishing industry and incentivised enough with additional fishing days.

For ITALY, the answer would be ‘A little’, indicating that more incentive is needed. The use of grid could be envisaged, together with temporal closures.

For FRANCE, the answer would be ‘Not much’, as it was already implemented the closure areas in the Gulf of Lion. The main strategy for protecting resource lies in the establishment of the temporal closure areas, especially to protect hake, spawning grounds and nurseries.

Section 3 – Ecosystem-based approach

Q10: To what extent has the objective of implementing an ecosystem-based approach to fisheries management, and notably of achieving good environmental status, been achieved?

A little.

Q11: To what extent have the closure areas contributed to the current situation?

Significantly.

Q12: To what extent has the MAP contributed to the current situation?

A little.

Q13: do you have specific comments on this point?

It should not be forgotten that the West Med management plan has important economic consequences, in particular on the trawler fleet, whose days at sea have decreased significantly since the beginning of the implementation of the plan.

Moreover, since the beginning of the plan, the professionals have been faced with numerous crises: the Covid crisis leading to a reduction in activities, the fuel crisis leading to great insecurity over prices and an increase in the operating costs of vessels. This has de facto raised the break-even point of the vessels by increasing their costs. Therefore, an ecosystem approach taking into account all factors should be considered (climate change, offshore wind development, fisheries, measures already in place, socio-economic consequences ...). Also, systemic changes in the Mediterranean (plankton, impact of climate change) must also be subject of scientific analysis, since changes in plankton have a significant impact on the entire trophic chain, even though the causes and consequences are unknown.

Section 4 – Control and enforcement

Q14: To what extent have the specific provisions laid down in the MAP allowed the national competent authorities to ensure compliance with the MAP itself?

A little.

Q15: Are there specific control measures that contributed substantially to improve compliance?

It is considered that the MAP does not include any specific control measures in addition to those in the Control Regulation.

Q16: Are there specific control measures that have instead not contributed to improve compliance?

Not indeed.

Q17: Are there specific control measure(s) missing in the MAP or in the Control Regulation which would improve compliance with the MAP?

It is mentioned here additional measures that have been implemented by MMSS:

SPAIN has developed a specific National Control Plan for demersal species in the Mediterranean, which will soon be implemented. In addition, it is an obligation for all trawlers to have installed on board the VMS despite the length overall.

FRANCE: In its national control plan 2021-2022 and its newly adopted control plan for 2023-2024 (part II), France has set up guidelines to enhance compliance of the West Med Plan and to consolidate its framework on this issue. This plan will apply during the period 2023-2024 and to all control units involved. EFCA measures (specific action on West Med and ABM) have also contributed to compliance.

ITALY: Within the National Control Plan on the West Med Map, Italy has implemented the obligation of Electronic logbook for all vessels using towed gears despite the length overall.

Section 5 – Regional cooperation

Q18: To what extent has the MAP in your opinion strengthened regional cooperation, including with stakeholders?

A little.

Q19: Do you have specific comments on this point?

Regarding relations with the stakeholders at national level, there are regular contacts and close consultations in the three Member States involved in order to adapt internally to the MAP implementation.

At regional level, MEDAC is having a role, at least sending their opinion to COM on such implementation at EU level.

Section 6 – Socio-economic impact

Regarding the socio-economic impact of the MAP, in your opinion

Q20: Given the Covid and the fuel crises, has the overall socio-economic situation of the fisheries sector improved since the entry into force of the MAP?

Counterproductive.

Q21: Given the Covid and the fuel crises, do you see a positive correlation between the implementation of the MAP and the socio-economic situation of the fisheries sector?

Not at all.

Section 7 – Overall assessment

Q22: What is your overall assessment of the western Mediterranean MAP?

See detailed answer in next question.

Q23: Do you have final comments?

Regarding the previous question above, more detailed positions of the three MMSS involved are given below:

For SPAIN, the overall assessment of the Western Mediterranean MAP is negative, since although some fishing stocks are improving, social and economic dimensions of CFP are not being respected due to the implementation which is being done from COM proposals.

For FRANCE the overall assessment is beneficial for the stocks, but maybe neutral taking into account the socio-economic consequences.

For ITALY the overall assessment is negative for the situation of the hake, neutral related to benefits for shrimps.

As a common view: many sustainability measures are already in place in the Mediterranean Sea, some of which are already beginning to bear fruit. However, it is necessary to take into account the biological response of the stocks on the one hand and the ecosystem approach on the other, in order to make the best assessment. Improved knowledge of the stocks and the dynamics of the basin also seems necessary (few species assessed, lack of knowledge, etc.).

It is not possible to continue with the fishing effort reduction. It is necessary to find a more suitable and economically sustainable solution for achieving the objectives of the MAP and it is paramount to foreseen incentives for the fishermen for this purpose. The aims of the MAP are achievable but probably the issue is the way how the MAP is being implemented. The socioeconomic pillar of the CFP should be duly taken into account.

**6.3. Individual MedAC member: Representatives of the French fishing sector
(CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE)**

Section 1 – Progress made towards sustainable fishing levels

According to the MAP, MSY is to be achieved for all relevant stocks on a progressive, incremental basis by 2020 where possible, and by 1 January 2025 at the latest. All stocks covered by the MAP are managed by yearly fishing opportunities, including since 2022 catch limits for species of deep-water shrimps. Out of 20 stocks, 15 received an analytical assessment by STECF in 2022 of which 7 had estimated biomass above Bpa and 4 had estimated biomass below Blim. Out of the 20 West Med demersal stocks, 5 stocks were near MSY in 2020 and 7 stocks were near MSY as of 2022.

In your opinion

Q2: Has the existence of a MAP facilitated the process of setting of fishing opportunities for the relevant stocks?

No opinion.

Q3: To what extent has the MAP contributed to increasing the number of stocks at MSY?

Significantly.

Q4: Has the MAP helped in dealing with difficult cases such as European hake or other sensitive stocks?

Significantly.

Q5: Do you have specific management suggestions to address the specific case of European hake?

The French sector notes the progress made in the number of stocks managed at MSY. Indeed, the STECF (1) showed that 94% of stocks were not at MSY in 2020 compared to 73% in 2022. It also demonstrated that some stocks could already respond positively to the measures of the management plan, in particular 9 of the 14 stocks assessed have a declining fishing mortality. For the GSA7 and GSA8, this assessment points to the encouraging results on the evolution of recruits in GSA7 and GSA8 and of the biomass in GSA8 of hake, as well as the biomass of red shrimp in GSA7.

In addition, more than half of the stocks are not scientifically assessed in the Mediterranean today: according to Ifremer (2), 54% of landings made by French Mediterranean fisheries in 2021 represent stocks not subject to scientific assessment. Ifremer adds that of the 263 species landed, only 9 are assessed in the Mediterranean.

It would also seem necessary not only to take into account the pressure of fishing on the stocks but to adopt a global ecosystem-based approach which takes into account all the pressures on the marine environment (climate change, pollution, other marine activities, etc.)

Regarding specific measures relating to hake, some Mediterranean fisheries concerned by the management plan are multi-specific. In this sense, the French sector is opposed to the management method by TAC for stocks. More specifically for hake, the introduction of a TAC is not desirable given the proportion of hake catches in total French catches (less than 10% by weight (3)), which may contribute to a risk of choke species.

Furthermore, the increase in the minimum catch size for hake will lead to an increase in discards of undersized fish and could make the derogations established under the delegated acts incompatible (de minimis exemptions).

Following the establishment of large spatio-temporal closure areas in the Gulf of Lion (6000km² over a total area of 12 000-13 000km²) to protect juveniles and adults of hake, which have demonstrated their effectiveness (4), it seems impossible to agree to the closure of additional areas in French waters.

In addition, it seems impossible to absorb further reductions in fishing effort because they would jeopardise the sustainability of the companies while the French profession has made substantial efforts since the beginning of the management plan in 2020.

Finally, the replenishment of biological stocks is a process that takes time. A study by Ifremer (5) has shown in particular that a period of two to three years is necessary to see the effect of the reduction in fishing effort by trawlers on the hake stock.

1 Scientific, Technical and Economic Committee for Fisheries (STECF) – Stock Assessments: demersal stocks in the western Mediterranean Sea. (STECF-22-09). Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/00380JRC132120

2 Ifremer, « Diagnostic 2022 sur les ressources halieutiques débarquées par la pêche française (métropolitaine) », janvier 2023.

3 Scientific, Technical and Economic Committee for Fisheries (STECF) - The 2022 Annual Economic Report on the EU Fishing Fleet (STECF 22-06), Prelezo, R., Sabatella, E., Virtanen, J. and Guillen, J. editors, Publications Office of the European Union, Luxembourg, 2022, doi:10.2760/120462, JRC130578.

4 Ifremer, Evaluation des fermetures spatio-temporelles mises en oeuvre à partir du 1er janvier 2020 pour la pêche au chalut en mer Méditerranée, 2021

5 Leforestier, S., Lehuta S., Mahévas, S., Jadaud, A., Vaz, S., 2020. Rapport du projet PECHALO (Pêche Chalutière Occitanie): Etude de l'impact de l'adaptation des stratégies de pêche et des navires de la flottille chalutière occitane pour améliorer leur viabilité et la durabilité de l'activité'

Section 2 – Discards and landing obligation

On discards and the landing obligation, in your opinion

Q6: To what extent have discards been eliminated and the landing obligation actually been implemented?

Counterproductive.

Q7: To what extent has the MAP contributed to achieving the current situation, notably via discard plans and technical measures?

No opinion.

Q8: To what extent do you support more selectivity measures?

Not at all.

Q9: if yes, which selectivity measures do you support specifically?

The French sector notes that the management plan has heightened interest in the topic of selectivity. However, some studies (6.7) have shown strong unsustainable economic losses during a mesh change, with a loss of catches for stocks already close to the MSY (mullet for example) in some cases or stocks which are not affected by the management plan.

Furthermore, they demonstrated that the effectiveness of increasing selectivity is strongly related to the species, the depth range and the area where fishing takes place. It should be recalled that France has opted for selectivity via the establishment of spatiotemporal closures, by closing access to fisheries to certain areas at key times for the biological cycle of species.

Regarding the landing obligation, the French sector questioned his administration and the EC repeatedly on the issue of choke species, without a satisfactory response. The dogmatic application of Article 15 in the context of mixed fisheries remains impossible without serious socio-economic consequences on the fisheries concerned.

6 Project IMPEMED - Improving the selectivity of trawl gears in the Mediterranean sea to advance the sustainable exploitation pattern of trawl fisheries

7 Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of the fishing effort regime in the Western Mediterranean – part VI (STECF-21-13). Publications Office of the European Union, Luxembourg, 2021, EUR 28359 EN, ISBN 978-92-76-43488-7, doi:10.2760/121901, JRC126965’

Section 3 – Ecosystem-based approach

Q10: To what extent has the objective of implementing an ecosystem-based approach to fisheries management, and notably of achieving good environmental status, been achieved?

Significantly.

Q11: To what extent have the closure areas contributed to the current situation?

Significantly.

Q12: To what extent has the MAP contributed to the current situation?

Significantly.

Q13: do you have specific comments on this point?

At the beginning of the management plan, the French fleet of trawlers was represented by 57 vessels in GSA7 and allowed the contribution of more than 80% of the fish auctions on the French Mediterranean market.

The successive reduction in fishing effort by trawlers during the management plan has had a very negative impact on the profitability of companies and the economic performance of fleets (1, 8), thus jeopardising the continuation of their activity, particularly in a context of increased fuel prices as observed in 2021 and Covid19.

In this context, a plan for the withdrawal of fishing vessels from the fleet was implemented by France (9), for which a third of the French trawler fleet of the GSA7 subscribed. Impacts on supplies to fish auctions and fish markets are to be expected with landing losses estimated at nearly 1 300 tonnes for more than €6 million for the Occitanie fish auctions.

The various scenarios of the STECF (7, 8, 10, 11) have also demonstrated a significant negative economic impact for trawlers in the short and medium term with a reduction in their gross added value. This is why STECF suggested in its last report (8) to conduct a detailed impact assessment for the further implementation of the management plan in order to calculate possible scenarios (including mitigation and adaptation measures

possible) regarding the implementation of effort reduction and the possible economic performance of the fishing fleets.

It should be remembered that the trawl fleet is structuring for the fishing industry in the Mediterranean (fish auctions, wholesalers, cooperatives, fishmongers). Thus, this reduction in the effort quota weakens the entire sector on the Mediterranean coast.

Concerning the closure areas more specifically, France has defined two spatio-temporal closures in the Gulf of Lion in accordance with Article 11 of the management plan - one of 3 368 km² for eight months, the other of 3 468 km² for six months – to meet the objectives of protecting juvenile and spawning hake. These two areas represent 49% of the area exploited in the Gulf of Lion and a significant part of French activity. It should be recalled the demonstrated effectiveness of these spatio-temporal closures (4) and the strengthening of management measures in the GFCM FRA area of the Gulf of Lion in 2021 (12).

8 Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of the fishing effort and catch regime for demersal fisheries in the western Mediterranean Sea – PART IX (STECF-22-11). Publications Office of the European Union, Luxembourg, 2022.

9 Arrêté du 28 avril 2022 relatif à la mise en oeuvre d'un plan de sortie de flotte pour les navires pêchant au moyen d'un chalut dans le cadre du plan de gestion pluriannuel en faveur de la conservation et de l'exploitation durable des stocks démersaux en Méditerranée en zone CGPM 37.GSA7

10 Scientific, Technical and Economic Committee for Fisheries (STECF) – 69th Plenary Report (PLEN-22-01). EUR 28359 EN, Publications Office of the European Union, Luxembourg, 2022, ISBN 978-92-76-51973-7, doi:10.2760/192738, JRC129241

11 Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of fishing effort regime in the Western Mediterranean – part V (STEC-20-13). EUR 28359 EN, Publications Office of the European Union, Luxembourg, 2020, ISBN 978-92-76-27701-9, doi:10.2760/143313, JRC122924

12 Recommendation GFCM/44/2021/5 on the establishment of a fisheries restricted area in the Gulf of Lion (geographical subarea 7) to protect spawning aggregations and deep-sea sensitive habitats, repealing Recommendation GFCM/33/2009/1'

Section 4 – Control and enforcement

Q14: To what extent have the specific provisions laid down in the MAP allowed the national competent authorities to ensure compliance with the MAP itself?

No opinion.

Q15: Are there specific control measures that contributed substantially to improve compliance?

/

Q16: Are there specific control measures that have instead not contributed to improve compliance?

/

Q17: Are there specific control measure(s) missing in the MAP or in the Control Regulation which would improve compliance with the MAP?

/

Section 5 – Regional cooperation

Q18: To what extent has the MAP in your opinion strengthened regional cooperation, including with stakeholders?

A little.

Q19: Do you have specific comments on this point?

The management plan is a regulatory framework allowing Member States to put in place regional measures. The French sector thus participates actively in the AC which provide opinions on the joint recommendations. Likewise, the French sector works closely with its administrations on these issues.

From this experience, the French sector emphasises the importance of fluid and regular communication aimed at strengthening collaboration between actors.

Section 6 – Socio-economic impact

Regarding the socio-economic impact of the MAP, in your opinion

Q20: Given the Covid and the fuel crises, has the overall socio-economic situation of the fisheries sector improved since the entry into force of the MAP?

Not at all.

Q21: Given the Covid and the fuel crises, do you see a positive correlation between the implementation of the MAP and the socio-economic situation of the fisheries sector?

Not at all.

Section 7 – Overall assessment

Q22: What is your overall assessment of the western Mediterranean MAP?

Negative.

Q23: Do you have final comments?

On the form of the consultation, it should be noted that the format does not allow us to comment on certain aspects of the management plan, which nevertheless seem important to raise. In this context, certain elements were brought in when answer boxes were available.

Regarding the subject of this consultation, it should be noted that the French sector in the Mediterranean has been applying, on its own initiative and for years, sustainability measures, always seeking the collaboration and support of the responsible administrations and scientific research. The constructive dynamic carried by the French sector produces positive effects on

the resource, in particular due to the significant efforts made to apply the measures of the management plan (trawl and longline fishing effort quota, spatio-temporal closures, catch limit for shrimps). It should also be noted that factors other than fishing pressure, already highlighted by scientists and the European Commission themselves (pollution, demographic pressure, climate change, invasive species, etc.), can influence stocks and deserve to be studied further.

In addition, the application of the management plan has so far focused too much on fixing fishing opportunities in the short term, without taking into account the socio-economic impacts. Article 3.3 of the management plan states that 'The plan shall implement the ecosystem-based approach to fisheries management in order to ensure that negative impacts of fishing activities on the marine ecosystem are minimised'. It therefore seems necessary to take into account the three pillars of sustainability in order to guarantee fishing and aquaculture activities that are environmentally, socially and economically sustainable. The CFP must contribute to guaranteeing a decent standard of living for the fishing sector. The achievement of these objectives must contribute to the security of the food supply and bring about spin-offs in terms of employment. Thus, the socio-economic dimension of the CFP must be reinforced and Article 2.1 of the CFP must be taken into account when establishing management measures.

It is now necessary for the sector to focus on future developments in order to face the challenges ahead.

That being said, it seems important to deploy scientific resource to improve means of knowledge in the Mediterranean (assessment of stocks, evaluation of other anthropogenic factors, etc.) and to evaluate the impacts of management measures on the fishing resource and fishing activities.

6.4. Individual MedAC member: Representatives of Spanish sector (UNACOMAR)

Section 1 – Progress made towards sustainable fishing levels

According to the MAP, MSY is to be achieved for all relevant stocks on a progressive, incremental basis by 2020 where possible, and by 1 January 2025 at the latest. All stocks covered by the MAP are managed by yearly fishing opportunities, including since 2022 catch limits for species of deep-water shrimps. Out of 20 stocks, 15 received an analytical assessment by STECF in 2022 of which 7 had estimated biomass above Bpa and 4 had estimated biomass below Blim. Out of the 20 West Med demersal stocks, 5 stocks were near MSY in 2020 and 7 stocks were near MSY as of 2022.

In your opinion

Q2: Has the existence of a MAP facilitated the process of setting of fishing opportunities for the relevant stocks?

No opinion.

Q3: To what extent has the MAP contributed to increasing the number of stocks at MSY?

Significantly.

Q4: Has the MAP helped in dealing with difficult cases such as European hake or other sensitive stocks?

Significantly.

Q5: Do you have specific management suggestions to address the specific case of European hake?

It is urgently necessary not only to take into account the pressure of fishing on the stocks but to adopt a global ecosystem-based approach which takes into account all the pressures on the marine environment (climate change, pollution, other marine activities, etc.).

The European Commission recognises that, apart from the economic crisis and the energy crisis (both exacerbated by the Russian invasion of Ukraine), it exist a triple crisis due to Climate Change, Biodiversity Loss and Pollution.

None of these three crises has its origin in professional fishing. A holistic vision must be applied urgently, and stop acting only on fishing activity. The precautionary principle cannot lead to the decision to act even if we do not have all the information. That is absurd. The precautionary principle requires that decisions not be made hastily. Much less that they are taken by acting solely on the Fisheries.

It should not be forgotten that Fishing and Aquaculture are the only human activities that require the state of the resource to be the best. The rest of the activities (Tourism, offshore wind energy, merchant marine, etc.) do not care what the state of the resource is.

Regarding specific measures relating to hake, we cannot forget that the Mediterranean fisheries concerned by the management plan are multi-specific. In this sense, the Mediterranean sector is opposed to the management method by TAC for stocks. The TAC for the Red Shrimp is a new error. And what doesn't have sense is to apply several measures over an activity without knowing how every one of these measures is working and affecting. It is needed to continue developing scientist studies (that at least needs more than 3-4 years to get a real feedback) in order to know which could be the best management measures, look about how the measures already applied are 'working' and how are the initial results observed, and so on.

In this way, the introduction of a TAC for the Hake is not desirable, especially for fleets whose proportion of hake catches in total catches is low, which could contribute to a risk of choke species.

Furthermore, the increase in the minimum catch size for hake will lead to an increase in discards of undersized fish and could make the derogations established under the delegated acts incompatible (de minimis exemptions).

In addition, it seems impossible to absorb further reductions in fishing effort because they would jeopardise the sustainability of the companies while the profession has made substantial efforts since the beginning of the management plan in 2020.

Following the establishment of large spatio-temporal closure areas in the Gulf of Lion (6000km² over a total area of 12 000-13 000km²) to protect juveniles and adults of hake, which have demonstrated their effectiveness, it seems impossible to agree to the closure of additional areas in French waters.

Finally, the replenishment of biological stocks is a process that takes time. A study by Ifremer has shown in particular that a period of two to three years is necessary to see the effect of the reduction in fishing effort by trawlers on the hake stock.

Section 2 – Discards and landing obligation

On discards and the landing obligation, in your opinion

Q6: To what extent have discards been eliminated and the landing obligation actually been implemented?

Counterproductive.

Q7: To what extent has the MAP contributed to achieving the current situation, notably via discard plans and technical measures?

No opinion.

Q8: To what extent do you support more selectivity measures?

A little.

Q9: if yes, which selectivity measures do you support specifically?

The Mediterranean sector notes that the management plan has heightened interest in the topic of selectivity.

However, some studies, have shown strong unsustainable economic losses during a mesh change, with a loss of catches for stocks already close to the MSY (mullet for example) in some cases or stocks which are not affected by the management plan. Furthermore, they demonstrated that the effectiveness of increasing selectivity is strongly related to the species, the depth range and the area where fishing takes place.

Has we have explain before, it is needed to have more time, in order to continue developing scientist studies looking for selectivity improvements. There are several works on the way about the use of the square mesh on 45 and 50 mm.

As long as its usefulness for the benefit of the sustainability of the target species is not known, nor is its impact at an economic and, therefore, social level, the direct and thoughtless application of new measures cannot be expected. Even less continue to apply a reduction in available work days.

The situation of fishing microenterprises is becoming more complicated every day. But while some fishing companies apply measures to try to remain operational (staff reduction, etc.), the representative structures that allow the work of our Fishermen and compliance with the complicated Community regulations, such as Brotherhoods, Associations, Producer Organisations, Cooperatives etc. are suffering the direct effects of the loss of economic performance of fishing micro-enterprises, but without the possibility of adjusting their costs (the occupancy fees, rates, etc. charged by the Public Administrations remain the same or increase, as do the wages, energy costs, etc.) or passing them on. If these structures fail, then it will be impossible for the fishing vessels to continue working. And this is a reality that nobody takes into account.

It is absolutely urgent that the Community Administrations come to know the existing social and economic reality in our ports. This is also a necessary task in the application of the MAP, in addition to maintaining a continuous and exquisite follow-up on the effects produced by the multiple measures applied on each of the three pillars: environmental, economic and social. This is the true exercise of application of the Precautionary Principle.

It should be recalled that some Member States have opted for selectivity via the establishment of spatio-temporal closures, by closing access to fisheries to certain areas at key times for the biological cycle of species.

In the Catalonia case, there are not only temporal closures going from two to three months per year (from long time ago; Long before the application of the MAP) but there are definitive closures of a total of almost 500 square kilometres.

It is important, in addition to continuing to study the 45 and 50 mm meshes, to continue investigating the use of flying trawl doors, which avoid contact with the seabed, with all the advantages that this measure has, in addition to significant savings in fuel and a reduction in carbon emissions.

Regarding the landing obligation, the dogmatic application of Article 15 in the context of mixed fisheries remains impossible without serious socio-economic consequences on the fisheries concerned.

Section 3 – Ecosystem-based approach

Q10: To what extent has the objective of implementing an ecosystem-based approach to fisheries management, and notably of achieving good environmental status, been achieved?

Significantly.

Q11: To what extent have the closure areas contributed to the current situation?

Significantly.

Q12: To what extent has the MAP contributed to the current situation?

Significantly.

Q13: do you have specific comments on this point?

The successive reduction in fishing effort by trawlers during the management plan has had a very negative impact on the profitability of companies and the economic performance of fleets, thus jeopardising the continuation of their activity, particularly in a context of increased fuel prices as observed in 2021 and the impact of the Covid19.

In this context, impacts on supplies to fish auctions and fish markets are being and suffering with enormous landing losses for the fish auctions and, for this reason, in the fisheries representative entities that manage them (Brotherhoods, Cooperatives, Associations, Producer Organisations).

This means that the entire backbone structure of professional fishing is being dynamited from its roots. Many of these structures are suffering significant economic losses in the last 4 years, which cannot be sustained much longer in time, which is why imminent bankruptcies are going to occur that will drag down entire fleets.

The various scenarios of the STECF have also demonstrated a significant negative economic impact for trawlers in the short and medium term with a reduction in their gross added value. This is why STECF suggested in its last report to conduct a detailed impact assessment for the further implementation of the management plan in order to calculate possible scenarios (including mitigation and adaptation measures possible) regarding the implementation of effort reduction and the possible economic performance of the fishing fleets.

It should be remembered that the trawl fleet is structured for the fishing industry in the Mediterranean (fish auctions, wholesalers, cooperatives, fishmongers) which is typical of Coastal Fishing. There is no artisanal fishing nor industrial fishing. We are always talking, in the Mediterranean, of its own and characteristic socioeconomic reality, of coastal fishing, of local and proximity production, of fishing activity of the day, leaving and returning to the same port.

Thus, this reduction in the effort quota weakens the entire sector on the Mediterranean coast.

Concerning the closure areas more specifically, it must be remembered that (e.g.) France has defined two spatio-temporal closures in the Gulf of Lion in accordance with Article 11 of the management plan - one of 3 368 km² for eight months, the other of 3 468 km² for six months – to meet the objectives of protecting juvenile and spawning hake. These two areas represent 49% of the area exploited in the Gulf of Lion and a significant part of French activity. It should also be recalled the demonstrated effectiveness of these spatio-temporal closures and the strengthening of management measures in the GFCM FRA area of the Gulf of Lion in 2021. O, también, cuanto hemos expuesto anteriormente sobre las medidas que se aplican, desde hace años, en Cataluña, región limítrofe con Francia en esa misma zona (GSA 6 and 7).

Section 4 – Control and enforcement

Q14: To what extent have the specific provisions laid down in the MAP allowed the national competent authorities to ensure compliance with the MAP itself?

No opinion.

Q15: Are there specific control measures that contributed substantially to improve compliance?

As we try to explain, the socioeconomic reality of the Mediterranean is unique and different from that of other areas (such as the Atlantic). This reality has not been taken into account, and the Commission has limited itself to the horizontal application of measures thought and designed for other realities. This, however, has produced some valuable effects.

Reducing available work days is not an appropriate measure. But, in any case, new reductions can no longer be applied, since the fishing micro-enterprises are working below the break-even point.

The legal regulations of the different member states contemplate a total of 260 working days a year. Leaving companies for less than 150 days is outrageous and can never be described as a ‘management measure’.

As has been stated, regions of Spain, France and Italy have been applying different types of measures for some time, in most cases at the initiative of the fishermen. Space-time closures and definitive closures, type of mesh, reduction in working hours, etc. These are measures that have been in place for a long time.

A holistic vision is required, which takes into account the reality of the Mediterranean, which takes into account each and every one of the activities that Man carries out, which takes into account the Triple Crisis of which the European Commission speaks (Change Climate, Biodiversity Loss and Pollution), taking into account the economic and energy crisis, the Russian invasion of Ukraine, the lingering effects of the COVID-19 pandemic, etc.

The Fishing Sector wants to continue researching the use of flying trawl doors, meshes of other sizes, better materials that allow greater selectivity and fuel savings, etc.

The control that exists over fishing activity in the European Union is the largest in the world. Our fishermen are the most supervised. But the problem is not our fishermen. They are the most formal and experienced professionals. For centuries they have been organised in structures recognised as true legal orders, and this long before the appearance of the structures of modern States. There are regulations from the fourteenth and fifteenth centuries, and much earlier, with courts and sanctioning systems.

Instead of applying the ‘presumption of guilt’ to our fishermen, media should be used to learn their social and economic reality in depth.

And more technical and economic means must be used to continue investigating the state of the resource, technological improvements, etc.

We don’t need more controls. Our fishermen are not criminals. They are the guardians of the sea. And they are the ones who have a real interest in ensuring that the sea and natural resources are in the best conditions, even if it is an exercise in pure selfishness: fishermen have always been aware that they live off the resource. Now you should be aware of all this, and stop applying measures in a multilateral way, without time for reflection or study. That is an error.

We don’t ask for anything else.

Q16: Are there specific control measures that have instead not contributed to improve compliance?

Reading the previous answer gives an answer to this one.

Q17: Are there specific control measure(s) missing in the MAP or in the Control Regulation which would improve compliance with the MAP?

As with the previous one, reading the previous answer gives an answer to this one. But to be more clear: no, there is not needed to implement more specific control measures.

What it is needed is to know better the Fisheries reality in the Mediterranean. What is needed is to construct an own Common Fisheries Policy specific for the Mediterranean.

Are you ready for this?

Section 5 – Regional cooperation

Q18: To what extent has the MAP in your opinion strengthened regional cooperation, including with stakeholders?

A little.

Q19: Do you have specific comments on this point?

The management plan is a regulatory framework allowing Member States to put in place regional measures. The Mediterranean sector thus participates actively in the MEDAC which provide opinions on the joint recommendations. Likewise, the Mediterranean sector works closely with its administrations on these issues.

From this experience, the Mediterranean sector emphasises the importance of fluid and regular communication aimed at strengthening collaboration between actors.

The Advisory Council carries out its work in an exquisite and responsible manner. Now, what is necessary and desirable is that the Member States collaborate among themselves, and with the Fishing Sector, with the Advisory Councils,,.

In the same way, the European Commission should be more attentive to the approaches of the Member States and, above all, to the work carried out by MEDAC and to that carried out by the representative organisations that are part of it.

Section 6 – Socio-economic impact

Regarding the socio-economic impact of the MAP, in your opinion

Q20: Given the Covid and the fuel crises, has the overall socio-economic situation of the fisheries sector improved since the entry into force of the MAP?

Counterproductive.

Q21: Given the Covid and the fuel crises, do you see a positive correlation between the implementation of the MAP and the socio-economic situation of the fisheries sector?

Counterproductive.

Section 7 – Overall assessment

Q22: What is your overall assessment of the western Mediterranean MAP?

Neutral.

Q23: Do you have final comments?

I believe that the MAP has produced some positive effects, but it is also producing many negative effects that, coinciding in time with situations as serious as the COVID-19 Pandemic, and the Economic Crisis, the Energy Crisis and the triple Crisis of Change climate change, the loss of biodiversity and pollution are leading fishing to a dead end situation.

Instead of applying a holistic vision, and of the precautionary principle also with respect to the other two pillars of the Common Fisheries Policy (economic and, above all, social), the Commission limits itself to applying highly restrictive measures, several measures at the same time, with a short-term time frame (only 5 years), etc. with which the situation that has been

caused is very serious, and it is ruining the Coastal Fisheries and the local economies of our coast, harming elementary principles such as those of Food Sovereignty and Food Security.

In fact, a decapitalisation of our primary production structure (not only at sea) is taking place, with which we are placing European citizens in the hands of third countries where there is no regulation such as the Community, nor does it exist a culture of sustainability like the European one. And, therefore, we are feeding Europe with productions that do not meet the high demands of the EU. This is how we harm our citizens and the environment.

That is not the ‘construction of the European house’, but rather its dismantling.

Study and analysis of all measures is required before their application. And after its application, it is also necessary to study and analyse its effects. And for all this it is necessary to have enough time. Short-termism is destroying sustainable and absolutely necessary activities for our subsistence as a society and for the sustainability of our sea and its resources.

6.5. Detailed MedAC advice on the consultation questions

Public answer available at:

[110 letter from mare to medac pescomed on reply to west med map eu survey.pdf \(med-ac.eu\)](https://www.mare.europa.eu/media/110/letter_from_mare_to_medac_pescomed_on_reply_to_west_med_map_eu_survey.pdf)



EU Survey Questionnaire on the Western Mediterranean Multi-Annual management Plan to the members of PescaMed and the Mediterranean Sea Advisory Council

Do you have specific management suggestions to address the specific case of European hake?

OP du Sud - France

"Nous ne pouvons pas envisager la mise en place de quotas de captures (TAC) pour le merlu car la pêche est multispécifique donc cela poserait des soucis de rentabilité et de mise en œuvre de l'obligation de débarquement.

La sélectivité ou le réhaussement de la taille minimale auraient des conséquences importantes pour la flotte.

Il faut laisser le temps de la réponse biologique à la ressource. Les mesures instaurées portent ou vont porter leurs fruits. Il est difficile pour les professionnels français d'aller plus loin (diminution nombre de jours de mer/fermetures spatiotemporelles)"

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE – France

"The Mediterranean sector notes the progress made in the number of stocks managed at MSY. Indeed, the STECF (1) showed that 94% of stocks were not at RMD in 2020 compared to 73% in 2022. It also demonstrated that some stocks could already respond positively to the measures of the management plan, in particular 9 of the 14 stocks assessed have a declining fishing mortality. For the GSA7 and GSA8, this assessment points to the encouraging results on the evolution of recruits in GSA7 and GSA8 and of the biomass in GSA8 of hake, as well as the biomass of red shrimp in GSA7.

In addition, more than half of the stocks are not scientifically assessed in the Mediterranean today: according to Ifremer (2), 54% of landings made by French Mediterranean fisheries in 2021 represent stocks not subject to scientific assessment. Ifremer adds that of the 263 species landed, only 9 are assessed in the Mediterranean.

It would also seem necessary not only to take into account the pressure of fishing on the stocks but to adopt a global ecosystem-based approach which takes into account all the pressures on the marine environment (climate change, pollution, other marine activities, etc.)

Regarding specific measures relating to hake, some Mediterranean fisheries concerned by the management plan are multi-specific. In this sense, the Mediterranean sector is opposed to the management method by TAC for stocks. More specifically for hake, the introduction of a TAC is not desirable given the proportion of hake catches in total French catches (less than 10% by weight (3)), which may contribute to a risk of choke species.

Furthermore, the increase in the minimum catch size for hake will lead to an increase in discards of undersized fish and could make the derogations established under the delegated acts incompatible (de minimis exemptions).

Following the establishment of large spatio-temporal closure areas in the Gulf of Lion (6000km² over a total area of 12,000-13,000km²) to protect juveniles and adults of hake, which have demonstrated their effectiveness (4), it seems impossible to agree to the closure of additional areas in French waters.

Disclaimer - This advice reflects only the MEDAC's view and the Commission is not responsible for any use that may be made of the information that it contains

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In addition, it seems impossible to absorb further reductions in fishing effort because they would jeopardize the sustainability of the companies while the French profession has made substantial efforts since the beginning of the management plan in 2020.

Finally, the replenishment of biological stocks is a process that takes time. A study by Ifremer (5) has shown in particular that a period of two to three years is necessary to see the effect of the reduction in fishing effort by trawlers on the hake stock.

1 Scientific, Technical and Economic Committee for Fisheries (STECF) – Stock Assessments: demersal stocks in the western Mediterranean Sea. (STECF-22-09). Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/00380.JRC132120

2 Ifremer, « Diagnostic 2022 sur les ressources halieutiques débarquées par la pêche française (métropolitaine) », janvier 2023.

3 Scientific, Technical and Economic Committee for Fisheries (STECF) - The 2022 Annual Economic Report on the EU Fishing Fleet (STECF 22-06), Prelezo, R., Sabatella, E., Virtanen, J. and Guillen, J. editors, Publications Office of the European Union, Luxembourg, 2022, doi:10.2760/120462, JRC130578.

4 Ifremer, Evaluation des fermetures spatio-temporelles mises en œuvre à partir du 1er janvier 2020 pour la pêche au chalut en mer Méditerranée, 2021

5 Leforestier, S., Lehufta S., Mahévas, S., Jadaud, A., Vaz, S., 2020. Rapport du projet PECHALO (Pêche Chalutière Occitanie) : Etude de l'impact de l'adaptation des stratégies de pêche et des navires de la flottille chalutière occitane pour améliorer leur viabilité et la durabilité de l'activité

EMPA - Spain

The closures of breeding and juvenile areas are effective, but time must be given to see the results of these measures.

UILAPESCA - Italy

Take into account the factors that really impact marine ecosystems and fish stocks, such as ocean acidification, global temperature rise, pollution, commercial traffic, etc.

UNACOMAR – Spain

"It is urgently necessary not only to take into account the pressure of fishing on the stocks but to adopt a global ecosystem-based approach which takes into account all the pressures on the marine environment (climate change, pollution, other marine activities, etc.).

The European Commission recognizes that, apart from the economic crisis and the energy crisis (both exacerbated by the Russian invasion of Ukraine), it exist a triple crisis due to Climate Change, Biodiversity Loss and Pollution.

None of these three crises has its origin in professional fishing. A holistic vision must be applied urgently, and stop acting only on fishing activity. The precautionary principle cannot lead to the decision to act even if we do not have all the information. That is absurd. The precautionary principle requires that decisions not be made hastily. Much less that they are taken by acting solely on the Fisheries.

It should not be forgotten that Fishing and Aquaculture are the only human activities that require the state of the resource to be the best. The rest of the activities (Tourism, offshore wind energy, merchant marine, etc.) do not care what the state of the resource is.

Regarding specific measures relating to hake, we cannot forget that the Mediterranean fisheries concerned by the management plan are multi-specific. In this sense, the Mediterranean sector is opposed to the management method by TAC for stocks. The TAC for the Red Shrimp is a new error. And what doesn't have sense is to apply several mesures over an activity without knowing how every one of theses measures is working and affecting. It is needed to continue developing scientist studies (that at least needs more than 3-4 years to get a real feedback) in order to know which could be the best management measures, look about how the measures already applied are "working" and how are the initial results observed, and so on.

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In this way, the introduction of a TAC for the Hake is not desirable, especially for fleets whose proportion of hake catches in total catches is low, which could contribute to a risk of choke species.

Furthermore, the increase in the minimum catch size for hake will lead to an increase in discards of undersized fish and could make the derogations established under the delegated acts incompatible (de minimis exemptions).

In addition, it seems impossible to absorb further reductions in fishing effort because they would jeopardize the sustainability of the companies while the profession has made substantial efforts since the beginning of the management plan in 2020.

Following the establishment of large spatio-temporal closure areas in the Gulf of Lion (6000km² over a total area of 12,000-13,000km²) to protect juveniles and adults of hake, which have demonstrated their effectiveness, it seems impossible to agree to the closure of additional areas in French waters.

Finally, the replenishment of biological stocks is a process that takes time. A study by Ifremer has shown in particular that a period of two to three years is necessary to see the effect of the reduction in fishing effort by trawlers on the hake stock"

Federpesca - Italy

Implement a common policy in order to use a common process, but only apply it where it is needed, GSA by GSA.

FNCCP - Spain

"Since 1960, technical measures have been established in Catalunya to protect the pike:

- Temporary biological closures in the specific period so as not to catch pike juveniles
- Decrease the daily fishing time
- Reduction of weekly fishing days, one less
- Progressive increase in the mesh light of the stroke

It is necessary to continue to look for sustainability measures for trawling while maintaining the socioeconomic

viability of the extractive fishing sector and its local populations. Trawling accounts for approximately sixty percent of the total catches in euros.

The MAP is not generating these certainties, on the contrary, the reduction of allocated days will not lead us

to achieve the objectives. The MSY in 2025 is not possible, as recognized by the scientific institutes. It is

necessary to establish a new Co-management Plan and make the fishermen participate and listen his opinion"

WWF

Once the effectiveness of Selectivity measures are proved to be effective, they should be mandatory

AGCI-AGRITAL – CONFCOOPERATIVE FEDAGRIPESCA e LEGACOOOP AGROALIMENTARE

"The Mediterranean sector notes the progress made in the number of stocks managed at MSY. Indeed, the STECF showed that 94% of stocks were not at RMD in 2020 compared to 73% in 2022. It also demonstrated that some stocks could already respond positively to the measures of the management plan, in particular 9 of the 14 stocks assessed have a declining fishing mortality.

In addition, more than half of the stocks are not scientifically assessed in the Mediterranean today: according to Ifremer, 54% of landings made by French Mediterranean fisheries in

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2021 represent stocks not subject to scientific assessment. Ifremer adds that of the 263 species landed, only 9 are assessed in the Mediterranean.

It would also seem necessary not only to take into account the pressure of fishing on the stocks but to adopt a global ecosystem-based approach which takes into account all the pressures on the marine environment (climate change, pollution, other marine activities, etc.)

Regarding specific measures relating to hake, some Mediterranean fisheries concerned by the management plan are multi-specific. In this sense, the Mediterranean sector is opposed to the management method by TAC for stocks. More specifically for hake, the introduction of a TAC is not desirable, especially for fleets whose proportion of hake catches in total catches is low, which could contribute to a risk of choke species.

Furthermore, the increase in the minimum catch size for hake will lead to an increase in discards of undersized fish and could make the derogations established under the delegated acts incompatible (de minimis exemptions).

In addition, it seems impossible to absorb further reductions in fishing effort because they would jeopardize the sustainability of the companies while the profession has made substantial efforts since the beginning of the management plan in 2020.

Following the establishment of large spatio-temporal closure areas in the Gulf of Lion (6000km² over a total area of 12,000-13,000km²) to protect juveniles and adults of hake, which have demonstrated their effectiveness, it seems impossible to agree to the closure of additional areas in French waters.

Finally, the replenishment of biological stocks is a process that takes time. A study by Ifremer has shown in particular that a period of two to three years is necessary to see the effect of the reduction in fishing effort by trawlers on the hake stock.

If you support more selectivity measures, which one do you support specifically?

OP du Sud

"CONTRE car la sélectivité ou le réhaussement de la taille minimale auraient des conséquences économiques importantes pour la flottille qui est multi-spécifique : perte de rentabilité déjà mise à mal, voire liquidation d'entreprise.

Conséquences également sur le marché car une augmentation du maillage causerait l'échappement de certaines espèces qui sont adultes de petite taille (sépioles, ...)

De plus les dispositifs sélectifs sont coûteux, le retour sur investissement est long et le FEAMPA ne permet pas de cofinancer puisque le segment chalutier est en déséquilibre.

La sélectivité spatio-temporelle est une forme de sélectivité à privilégier"

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France

"The CNPMEM notes that the management plan has heightened interest in the topic of selectivity. However, some studies (6,7) have shown strong unsustainable economic losses during a mesh change, with a loss of catches for stocks already close to the MSY (mullet for example) in some cases or stocks which are not affected by the management plan. Furthermore, they demonstrated that the effectiveness of increasing selectivity is strongly related to the species, the depth range and the area where fishing takes place.

It should be recalled that France has opted for selectivity via the establishment of spatio-temporal closures, by closing access to fisheries to certain areas at key times for the biological cycle of species.

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Regarding the landing obligation, the CNPMM questioned his administration and the EC repeatedly on the issue of choke species, without a satisfactory response. The dogmatic application of Article 15 in the context of mixed fisheries remains impossible without serious socio-economic consequences on the fisheries concerned.

6 Project IMPEMED - Improving the selectivity of trawl gears in the Mediterranean sea to advance the sustainable exploitation pattern of trawl fisheries

7 Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of the fishing effort regime in the Western Mediterranean – part VI (STECF-21-13). Publications Office of the European Union, Luxembourg, 2021, EUR 28359 EN, ISBN 978-92-76-43488-7, doi:10.2760/121901, JRC126965

EMPA – Spain

We must give time to the measures already taken. It is counterproductive to continuously take measures without checking the results of those already taken, leading to the confusion of not knowing for sure which ones are effective.

UNACOMAR - Spain

"The Mediterranean sector notes that the management plan has heightened interest in the topic of selectivity.

However, some studies , have shown strong unsustainable economic losses during a mesh change, with a loss of catches for stocks already close to the MSY (mullet for example) in some cases or stocks which are not affected by the management plan. Furthermore, they demonstrated that the effectiveness of increasing selectivity is strongly related to the species, the depth range and the area where fishing takes place.

Has we have explain before, it is needed to have more time, in order to continue developing scientist studies looking for selectivity improvements. There are several works on the way about the use of the square mesh on 45 and 50 mm.

As long as its usefulness for the benefit of the sustainability of the target species is not known, nor is its impact at an economic and, therefore, social level, the direct and thoughtless application of new measures cannot be expected. Even less continue to apply a reduction in available work days.

The situation of fishing micro-enterprises is becoming more complicated every day. But while some fishing companies apply measures to try to remain operational (staff reduction, etc.), the representative structures that allow the work of our Fishermen and compliance with the complicated Community regulations, such as Brotherhoods, Associations, Producer Organizations, Cooperatives etc are suffering the direct effects of the loss of economic performance of fishing micro-enterprises, but without the possibility of adjusting their costs (the occupancy fees, rates, etc. charged by the Public Administrations remain the same or increase, as do the wages, energy costs, etc.) or passing them on. If these structures fail, then it will be impossible for the fishing vessels to continue working. And this is a reality that nobody takes into account.

It is absolutely urgent that the Community Administrations come to know the existing social and economic reality in our ports. This is also a necessary task in the application of the MAP, in addition to maintaining a continuous and exquisite follow-up on the effects produced by the multiple measures applied on each of the three pillars: environmental, economic and social. This is the true exercise of application of the Precautionary Principle

It should be recalled that some Member States have opted for selectivity via the establishment of spatio-temporal closures, by closing access to fisheries to certain areas at key times for the biological cycle of species.

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In the Catalonia case, there are not only temporal closures going from two to three months per year (from long time ago; Long before the application of the MAP) but there are definitive closures of a total of almost 500 square kilometers.

It is important, in addition to continuing to study the 45 and 50 mm meshes, to continue investigating the use of flying trawl doors, which avoid contact with the seabed, with all the advantages that this measure has, in addition to significant savings in fuel and a reduction in carbon emissions.

Regarding the landing obligation, the dogmatic application of Article 15 in the context of mixed fisheries remains impossible without serious socio-economic consequences on the fisheries concerned."

Federpesca – Italy

Selectivity measures should be indicated, evaluated and agreed upon through monitoring, verification between the fishers operating in the area and the research institutes, maintaining a balance of the parties in the evaluations.

FNCCP - Spain

"It is necessary to find the balance between the sustainability of the fishing resource and the survival of the fishermen and other agents in the circuit of the commercialization of fish and seafood. A program should be established based on the scientific method of trial and error, in the implementation of technical measures, step by step. It is also necessary to apply the measures in each territory, the principle of territorialization has been lost in the application of the rules, what is good in one place may not be positive in another."

WWF

T90/grids on bottom trawling

AGCI-AGRITAL – CONFCOOPERATIVE FEDAGRIPECA e LEGACOOOP AGROALIMENTARE

The Mediterranean sector notes that the management plan has heightened interest in the topic of selectivity. However, some studies, have shown strong unsustainable economic losses during a mesh change, with a loss of catches for stocks already close to the MSY (mullet for example) in some cases or stocks which are not affected by the management plan. Furthermore, they demonstrated that the effectiveness of increasing selectivity is strongly related to the species, the depth range and the area where fishing takes place.

It should be recalled that some Member States have opted for selectivity via the establishment of spatio-temporal closures, by closing access to fisheries to certain areas at key times for the biological cycle of species.

Regarding the landing obligation, the dogmatic application of Article 15 in the context of mixed fisheries remains impossible without serious socio-economic consequences on the fisheries concerned.

On the ecosystem-based approach, do you have specific comments on the MAP contribution to the current situation?

OP du Sud - France

"Les fermetures spatio-temporelles instaurées en France représentent des surfaces considérables.

Elles ont montré leur efficacité.

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Il ne faut cependant pas fermer plus de zone car l'espace devient restreint et cela peut entraîner une concentration de l'effort de pêche"

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France

"At the beginning of the management plan, the French fleet of trawlers was represented by 57 vessels and allowed the contribution of more than 80% of the fish auctions on the French Mediterranean market.

The successive reduction in fishing effort by trawlers during the management plan has had a very negative impact on the profitability of companies and the economic performance of fleets (1, 8), thus jeopardizing the continuation of their activity, particularly in a context of increased fuel prices as observed in 2021 and Covid19.

In this context, a plan for the withdrawal of fishing vessels from the fleet was implemented by France (9), for which a third of the French trawler fleet of the GSA7 subscribed. Impacts on supplies to fish auctions and fish markets are to be expected with landing losses estimated at nearly 1,300 tonnes for more than €6 million for the Occitanie fish auctions.

The various scenarios of the STECF (7, 8, 10, 11) have also demonstrated a significant negative economic impact for trawlers in the short and medium term with a reduction in their gross added value. This is why STECF suggested in its last report (8) to conduct a detailed impact assessment for the further implementation of the management plan in order to calculate possible scenarios (including mitigation and adaptation measures possible) regarding the implementation of effort reduction and the possible economic performance of the fishing fleets.

It should be remembered that the trawl fleet is structuring for the fishing industry in the Mediterranean (fish auctions, wholesalers, cooperatives, fishmongers). Thus, this reduction in the effort quota weakens the entire sector on the Mediterranean coast.

Concerning the closure areas more specifically, France has defined two spatio-temporal closures in the Gulf of Lion in accordance with article 11 of the management plan - one of 3368 km² for eight months, the other of 3468 km² for six months – to meet the objectives of protecting juvenile and spawning hake. These two areas represent 49% of the area exploited in the Gulf of Lion and a significant part of French activity. It should be recalled the demonstrated effectiveness of these spatio-temporal closures (4) and the strengthening of management measures in the GFCM FRA area of the Gulf of Lion in 2021 (12).

8 Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of the fishing effort and catch regime for demersal fisheries in the western Mediterranean Sea – PART IX (STECF-22-11). Publications Office of the European Union, Luxembourg, 2022, doi:XXXXXXX, JRCXXXXXX.

9 Arrêté du 28 avril 2022 relatif à la mise en œuvre d'un plan de sortie de flotte pour les navires pêchant au moyen d'un chalut dans le cadre du plan de gestion pluriannuel en faveur de la conservation et de l'exploitation durable des stocks démersaux en Méditerranée en zone CGPM 37.GSA7

10 Scientific, Technical and Economic Committee for Fisheries (STECF) – 69th Plenary Report (PLEN-22-01). EUR 28359 EN, Publications Office of the European Union, Luxembourg, 2022, ISBN 978-92-76-51973-7, doi:10.2760/192738, JRC129241

11 Scientific, Technical and Economic Committee for Fisheries (STECF) – Evaluation of fishing effort regime in the Western Mediterranean – part V (STEC-20-13). EUR 28359 EN, Publications Office of the European Union, Luxembourg, 2020, ISBN 978-92-76-27701-9, doi:10.2760/143313, JRC122924

12 Recommendation GFCM/44/2021/5 on the establishment of a fisheries restricted area in the Gulf of Lion (geographical subarea 7) to protect spawning aggregations and deep-sea sensitive habitats, repealing Recommendation GFCM/33/2009/1"

EMPA - Spain

Good environmental status does not depend exclusively on fisheries management. Most of the negative effects on the marine environment come from land, therefore, no matter how much ecosystem management approach is implemented in fishing, it will not give results until the other negative effects unrelated to fishing are eliminated.

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UNACOMAR – Spain

"The successive reduction in fishing effort by trawlers during the management plan has had a very negative impact on the profitability of companies and the economic performance of fleets, thus jeopardizing the continuation of their activity, particularly in a context of increased fuel prices as observed in 2021 and the impact of the Covid19.

In this context, impacts on supplies to fish auctions and fish markets are being and suffering with enormous landing losses for the fish auctions and, for this reason, in the fisheries representative entities that manage them (Brotherhoods, Cooperatives, Associations, Producer Organizations).

This means that the entire backbone structure of professional fishing is being dynamited from its roots. Many of these structures are suffering significant economic losses in the last 4 years, which cannot be sustained much longer in time, which is why imminent bankruptcies are going to occur that will drag down entire fleets.

The various scenarios of the STECF have also demonstrated a significant negative economic impact for trawlers in the short and medium term with a reduction in their gross added value. This is why STECF suggested in its last report to conduct a detailed impact assessment for the further implementation of the management plan in order to calculate possible scenarios (including mitigation and adaptation measures possible) regarding the implementation of effort reduction and the possible economic performance of the fishing fleets.

It should be remembered that the trawl fleet is structured for the fishing industry in the Mediterranean (fish auctions, wholesalers, cooperatives, fishmongers) which is typical of Coastal Fishing. There is no artisanal fishing nor industrial fishing. We are always talking, in the Mediterranean, of its own and characteristic socioeconomic reality, of coastal fishing, of local and proximity production, of fishing activity of the day, leaving and returning to the same port.

Thus, this reduction in the effort quota weakens the entire sector on the Mediterranean coast.

Concerning the closure areas more specifically, it must be remembered that (e.g.) France has defined two spatio-temporal closures in the Gulf of Lion in accordance with article 11 of the management plan - one of 3368 km² for eight months, the other of 3468 km² for six months – to meet the objectives of protecting juvenile and spawning hake. These two areas represent 49% of the area exploited in the Gulf of Lion and a significant part of French activity. It should also be recalled the demonstrated effectiveness of these spatio-temporal closures and the strengthening of management measures in the GFCM FRA area of the Gulf of Lion in 2021. O, también, cuanto hemos expuesto anteriormente sobre las medidas que se aplican, desde hace años, en Cataluña, región limítrofe con Francia en esa misma zona (GSA 6 and 7)."

Federpesca - Italy

"The nursery areas have effectively contributed to an ecosystem approach to fisheries management. We now need to move on to phase 2: integrate fishers as guardians of the nursery areas with appropriate training.

Moreover, it should be deepened the knowledge of the current state of play and of various factors, such as logistics of the area, number and characteristics of vessels, local customs, and traditions.

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"The successive reduction in fishing effort by trawlers during the management plan has had a very negative impact on the profitability of companies and the economic performance of fleets¹, , thus jeopardizing the continuation of their activity, particularly in a context of increased fuel prices as observed in 2021 and Covid19. In this context, a plan for the withdrawal of fishing vessels from the fleet was implemented by France , for which a third of the French trawler fleet of the GSA⁷ subscribed. Impacts on supplies to fish auctions and fish markets are to be expected with landing losses estimated at nearly 1,300 tonnes for more than €6 million for the Occitanie fish auctions.

In Italy the last withdrawal of fishing vessels from the fleet was done by 31/12/2017, according to regulation 508/2014: at that time, the European Commission was convinced that the demolition would no longer take place.

The various scenarios of the STECF^{6,7}, , have also demonstrated a significant negative economic impact for trawlers in the short and medium term with a reduction in their gross added value. This is why STECF suggested in its last report⁷ to conduct a detailed impact assessment for the further implementation of the management plan in order to calculate possible scenarios (including mitigation and adaptation measures possible) regarding the implementation of effort reduction and the possible economic performance of the fishing fleets.

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On Control and enforcement, in your opinion are there specific control measures that contributed substantially to improve compliance?

Coldiretti - Italy

Net size mesh control

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France

/

EMPA - Spain

All

UNACOMAR - Spain

"As we try to explain, the socioeconomic reality of the Mediterranean is unique and different from that of other areas (such as the Atlantic). This reality has not been taken into account, and the Commission has limited itself to the horizontal application of measures thought and designed for other realities. This, however, has produced some valuable effects.

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Reducing available work days is not an appropriate measure. But, in any case, new reductions can no longer be applied, since the fishing micro-enterprises are working below the break-even point.

The legal regulations of the different member states contemplate a total of 260 working days a year. Leaving companies for less than 150 days is outrageous and can never be described as a "management measure".

As has been stated, regions of Spain, France and Italy have been applying different types of measures for some time, in most cases at the initiative of the fishermen. Space-time closures and definitive closures, type of mesh, reduction in working hours, etc. These are measures that have been in place for a long time.

A holistic vision is required, which takes into account the reality of the Mediterranean, which takes into account each and every one of the activities that Man carries out, which takes into account the Triple Crisis of which the European Commission speaks (Change Climate, Biodiversity Loss and Pollution), taking into account the economic and energy crisis, the Russian invasion of Ukraine, the lingering effects of the COVID-19 pandemic, etc.

The Fishing Sector wants to continue researching the use of flying trawl doors, meshes of other sizes, better materials that allow greater selectivity and fuel savings, etc.

The control that exists over fishing activity in the European Union is the largest in the world. Our fishermen are the most supervised. But the problem is not our fishermen. They are the most formal and experienced professionals. For centuries they have been organized in structures recognized as true legal orders, and this long before the appearance of the structures of modern States. There are regulations from the fourteenth and fifteenth centuries, and much earlier, with courts and sanctioning systems.

Instead of applying the "presumption of guilt" to our fishermen, media should be used to learn their social and economic reality in depth.

And more technical and economic means must be used to continue investigating the state of the resource, technological improvements, etc.

We don't need more controls. Our fishermen are not criminals. They are the guardians of the sea. And they are the ones who have a real interest in ensuring that the sea and natural resources are in the best conditions, even if it is an exercise in pure selfishness: fishermen have always been aware that they live off the resource. Now you should be aware of all this, and stop applying measures in a multilateral way, without time for reflection or study. That is an error.

We don't ask for anything else."

Federpesca - Italy

- Control measures are especially those implemented on the trawling and floating trawl fishing, through the compulsory B&B and AIS. At least 30% of the vessels are exempt, and a good 20% not manage well the measures.

On Control and enforcement, in your opinion are there specific control measures that have instead not contributed to improve compliance?

Coldiretti - Italy

Landing obligation

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EMPA - Spain

No

UNACOMAR - Spain

Reading the previous answer gives an answer to this one.

Federpesca - Italy

Those control measures that are not applied due to exemptions in favour of certain categories that are thus able to fish in nursery areas and do not monitor harvested production.

On Control and enforcement, in your opinion are there specific control measures missing in the MAP or in the Control regulation which would improve compliance with the MAP?

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France /

EMPA - Spain

Too many "control" measures.

UNACOMAR - Spain

"as with the previous one, reading the previous answer gives an answer to this one. But to be more clear: no, there is not needed to implement more specific control measures.

What it is needed is to know better the Fisheries reality in the Mediterranean. What is needed is to construct an own Common Fisheries Policy specific for the Mediterranean.

Are you ready for this?"

Federpesca - Italy

"Improvement and facilitation of current electronic control procedures for all professional and recreational fishing vessels.

Rewarding conditions related to turnover and not to tonnage or engine power.

It also should be better the training in the sector of control authorities."

WWF

VMS on all vessels

Do you have specific comments on what extent has the MAP strengthened regional cooperation, including with stakeholders?

OP du Sud - France

Echanges avec les représentants espagnols et italiens renforcés.

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France

"The management plan is a regulatory framework allowing Member States to put in place regional measures. The CNPMEM thus participates actively in the AC which provide opinions on the joint recommendations. Likewise, the CNPMEM works closely with its administrations on these issues.

From this experience, the CNPMEM emphasizes the importance of fluid and regular communication aimed at strengthening collaboration between actors."

EMPA - Spain

It has had the effect of putting all stakeholders on the same page.

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UNACOMAR – Spain

"The management plan is a regulatory framework allowing Member States to put in place regional measures. The Mediterranean sector thus participates actively in the MEDAC which provide opinions on the joint recommendations. Likewise, the Mediterranean sector works closely with its administrations on these issues.

From this experience, the Mediterranean sector emphasizes the importance of fluid and regular communication aimed at strengthening collaboration between actors.

The Advisory Council carries out its work in an exquisite and responsible manner. Now, what is necessary and desirable is that the Member States collaborate among themselves, and with the Fishing Sector, with the Advisory Councils.

In the same way, the European Commission should be more attentive to the approaches of the Member States and, above all, to the work carried out by MEDAC and to that carried out by the representative organizations that are part of it."

Federpesca - Italy

The role of FLAGs should be prioritized.

WWF

Consultation at national level is weak in some cases

AGCI-AGRITAL – CONF COOPERATIVE FEDAGRI PESCA e LEGACOOOP AGROALIMENTARE

"The management plan is a regulatory framework allowing Member States to put in place regional measures. The Mediterranean sector thus participates actively in the MEDAC which provide opinions on the joint recommendations. Likewise, the Mediterranean sector works closely with its administrations on these issues.

From this experience, the Mediterranean sector emphasizes the importance of fluid and regular communication aimed at strengthening collaboration between actors."

Do you have final comments?

OP du Sud - France

"Ce type de questionnaire avec des questions fermées n'est pas très approprié

De nombreuses réponses mériteraient d'être nuancées

On note l'amélioration de l'état du stock de rouget en GSA 7 et l'application de mesures de gestion drastiques au travers du plan de gestion, qui contraignent les navires, fragilisent le secteur, dans un contexte compliqué (COVID, Guerre en Ukraine)

Il est nécessaire de laisser du temps à la réponse biologique des stocks et de réaliser une étude socio-économique avant d'aller plus loin dans l'application de mesures. Il reste moins de 50 chalutiers en Méditerranée continentale française en 2023, c'est important pour la filière qu'ils puissent continuer leur activité.

il faut accentuer la recherche scientifique"

CNPMEM - CRPMEM PACA - CRPMEM OCCITANIE - CRPMEM CORSE - France

"On the form of the consultation, it should be noted that the format does not allow us to comment on certain aspects of the management plan, which nevertheless seem important to raise. In this context, certain elements were brought in when answer boxes were available.

Regarding the subject of this consultation, it should be noted that the fishing sector in the Mediterranean has been applying, on its own initiative and for years, sustainability measures, always seeking the collaboration and support of the responsible administrations

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and scientific research. The constructive dynamic carried by the Mediterranean profession produces positive effects on the resource, in particular due to the significant efforts made to apply the measures of the management plan (trawl and longline fishing effort quota, spatio-temporal closures, catch limit for shrimps). It should also be noted that factors other than fishing pressure, already highlighted by scientists and the European Commission themselves (pollution, demographic pressure, climate change, invasive species, etc.), can influence stocks and deserve to be studied further.

In addition, the application of the management plan has so far focused too much on fixing fishing opportunities in the short term, without taking into account the socio-economic impacts. Article 3.3 of the management plan states that "The plan shall implement the ecosystem-based approach to fisheries management in order to ensure that negative impacts of fishing activities on the marine ecosystem are minimized". It therefore seems necessary to take into account the three pillars of sustainability in order to guarantee fishing and aquaculture activities that are environmentally, socially and economically sustainable. The CFP must contribute to guaranteeing a decent standard of living for the fishing sector. The achievement of these objectives must contribute to the security of the food supply and bring about spin-offs in terms of employment. Thus, the socio-economic dimension of the CFP must be reinforced and Article 2.1 of the CFP must be taken into account when establishing management measures.

It is now necessary for the sector to focus on future developments in order to face the challenges ahead.

That being said, it seems important to deploy scientific resource to improve means of knowledge in the Mediterranean (assessment of stocks, evaluation of other anthropogenic factors, etc.) and to evaluate the impacts of management measures on the fishing resource and fishing activities."

EMPA – Spain

"The MAP measures, especially the continuous reduction of effort without material time to verify results, are leading the fishing sector -especially the trawling fleet- to economic insolvency and the sector in general to the unsustainability of sectoral infrastructures, both social as business. There is no economic sector that can resist a 40% reduction in its production.

It is the result of only carrying out the environmental approach (which also) in the management of fisheries without taking into account socio-economic sustainability.

Overlapping of continuous and different measures (selectivity, area closures, techniques,...) for the same objectives, which do not allow robust scientific data to be obtained to identify which are effective and which are not, entering into the unreasonable need to continually request more, without even having perspective of the end of this tortuous path."

UNACOMAR - Spain

"I believe that the MAP has produced positive effects, but it is also producing many negative effects that, coinciding in time with situations as serious as the COVID-19 Pandemic, and the Economic Crisis, the Energy Crisis and the triple Crisis of Change climate change, the loss of biodiversity and pollution are leading fishing to a dead end situation.

Instead of applying a holistic vision, and of the precautionary principle also with respect to the other two pillars of the Common Fisheries Policy (economic and, above all, social), the Commission limits itself to applying highly restrictive measures, several measures at the same time, with a short-term time frame (only 5 years), etc. with which the situation that has been

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caused is very serious, and it is ruining the Coastal Fisheries and the local economies of our coast, harming elementary principles such as those of Food Sovereignty and Food Security. In fact, a decapitalization of our primary production structure (not only at sea) is taking place, with which we are placing European citizens in the hands of third countries where there is no regulation such as the Community, nor does it exist a culture of sustainability like the European one. And, therefore, we are feeding Europe with productions that do not meet the high demands of the EU. This is how we harm our citizens and the environment. That is not the "construction of the European house", but rather its dismantling. Study and analysis of all measures is required before their application. And after its application, it is also necessary to study and analyze its effects. And for all this it is necessary to have enough time. Short-termism is destroying sustainable and absolutely necessary activities for our subsistence as a society and for the sustainability of our sea and its resources."

Federpesca - Italy

"WestMed MAP alone is not enough. The involvement of fishers as protagonists is essential. And not as mere extras. The MAP without the fishermen would have no reason to be. And vice versa.

It should be noted that STECF sent an assessment indicating improvements in stocks towards sustainable fishing levels with the MsY being reached on some of them. This trend could be seen in 2020 and improvements are confirmed in 2022.

These improvements have been achieved on the skin of fishers with a reduction in fishing days that by 2024 will reach 40% as stipulated in reg.2019/1022 art. 7 that regulates it.

Then we must take into account that the 2 years of Covid 19 have forced fishing vessels to limit their activities due to lack of demand in the fresh fish markets.

In addition to this state of affairs, we must not forget the exuberant increase in fuel prices, which account for about 60 per cent of the vessel's operating costs.

This situation leads to a clear desire on the part of fishermen to abandon fishing because they are no longer able to do business economically.

The time for decisions is now, and if we think about decisions to be taken in the medium or long term, it will bring about the end of a strategic sector in terms of economic activity, culture (it is the fishermen who over time have worked to protect and conserve stocks and marine environments), and the supply of products that are controlled and guaranteed in terms of health."

FNCCP - Spain

"Unfortunately, we have lost an opportunity to improve the situation we suffer in the Western Mediterranean. In almost two and a half years of application of the RE MAP, the situation in the fishing sector is much worse than it was in 2019. With this erratic application, without giving more time to achieve the objectives, with differentiation of fisheries according to the species target (demersal fish or red shrimp) have excluded the vast majority of our boats that had mixed targets, fish and shrimp. All of this has generated uncertainty, a desire to leave the sector and a lack of generational relief. You have made them hate their jobs. Think with food sovereignty, the populations dependent on fishing and stop this wrong path. There is a future, but not in this way."

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"On the form of the consultation, it should be noted that the format does not allow us to comment on certain aspects of the management plan, which nevertheless seem important

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to raise. In this context, certain elements were brought in when answer boxes were available.

Regarding the subject of this consultation, it should be noted that the fishing sector in the Mediterranean has been applying, on its own initiative and for years, sustainability measures, always seeking the collaboration and support of the responsible administrations and scientific research. The constructive dynamic carried by the Mediterranean profession produces positive effects on the resource, in particular due to the significant efforts made to apply the measures of the management plan (trawl and longline fishing effort quota, spatio-temporal closures, catch limit for shrimps). It should also be noted that factors other than fishing pressure, already highlighted by scientists and the European Commission themselves (pollution, demographic pressure, climate change, invasive species, etc.), can influence stocks and deserve to be studied further.

In addition, the application of the management plan has so far focused too much on fixing fishing opportunities in the short term, without taking into account the socio-economic impacts. Article 3.3 of the management plan states that "The plan shall implement the ecosystem-based approach to fisheries management in order to ensure that negative impacts of fishing activities on the marine ecosystem are minimized". It therefore seems necessary to take into account the three pillars of sustainability in order to guarantee fishing and aquaculture activities that are environmentally, socially and economically sustainable. The CFP must contribute to guaranteeing a decent standard of living for the fishing sector. The achievement of these objectives must contribute to the security of the food supply and bring about spin-offs in terms of employment. Thus, the socio-economic dimension of the CFP must be reinforced and Article 2.1 of the CFP must be taken into account when establishing management measures.

It is now necessary for the sector to focus on future developments in order to face the challenges ahead.

That being said, it seems important to deploy scientific resource to improve means of knowledge in the Mediterranean (assessment of stocks, evaluation of other anthropogenic factors, etc.) and to evaluate the impacts of management measures on the fishing resource and fishing activities."

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