



Joint NGO priorities on the Multi-annual plan for the Western Mediterranean Sea (WMedMAP)

June 2018

The Commission's proposal is a first step in the right direction to tackle the long-lasting overfishing situation in the Mediterranean Sea and realise the Common Fisheries Policy (CFP)'s objectives of achieving Maximum Sustainable Yield (MSY) by 2020 and minimize fisheries impacts on the ecosystems. However, the WMedMAP is clearly insufficient as it stands to reverse the situation.

A new transparent, science-based and participative fisheries governance is central to achieving long term sustainability and to implement effective management measures that are by now strongly needed to prevent Mediterranean fish stocks from collapsing and to recover them.

We call on you to **support** the Commission's proposal to:

- Ensure that the exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the **MSY** (CFP art.2);
- Adapt fishing mortality to sustainable levels, **with science-based quantifiable targets and conservation reference points**, as well as **safeguards measures**, such as emergency closures of fisheries to avoid stocks collapse;
- Introduce fishing opportunities, with both a **fishing efforts regime** and complementary **Total Allowable Catches (TACs)** when the former case proves insufficient to deliver its objectives;
- Implement the **ecosystem-based approach** to fisheries management and ensure coherence with environmental legislation and the objective of achieving good environmental status by 2020 in the Marine Strategy Framework Directive (MSFD)

We call on you to **amend** the proposal to ensure that the WMedMAP :

- **Increases the trawl-free zone all year round to at least 100m depth** to better protect juvenile fish aggregations from key demersal stocks and restore their biomass, to minimise the destructive impacts of trawling on sensitive habitats, and ensure preferential access to well-managed low-impact small-scale fisheries;
- Reflects STECF advice and **modifies the categories of fishing efforts regime** (annex I of the proposal) to more disaggregated categories according to the stock assemblages found at different depths, which allows more realistic effort allocation in line with stock status.
- **Introduces catch limits (TACs)** for certain stocks when available scientific information **proves TACs to be more effective than an effort management regime** in achieving the targets of the WMedMAP, considering the likely composition of catches in mixed fisheries to ensure that all species are exploited within safe limits.
- Encourages a more **participative management** through ad hoc multi-stakeholder groups at fishery/local level (e.g. co-management committees) able to define measures, monitor them and nimbly react to environmental and fisheries changes.

MEDITERRANEAN LONG-LASTING OVERFISHING CRISIS: ACT NOW OR LOSE IT

The Mediterranean Sea is the most overexploited sea in Europe: **over 90% of all assessed fish stocks are overfished**¹ and, particularly in the Western Mediterranean, severe overexploitation poses high biological risks of collapse². This biological crisis is directly threatening fishers, businesses and coastal communities' livelihood in the region. If no decisive action is urgently taken, fisheries will collapse in the short-term or will face emergency closures to avoid this worst-case scenario.

This situation is the result of decades of fisheries mismanagement, misreporting and illegal fishing. The measures taken so far have been inefficient, without an effective effort management scheme based on status of stocks. Effort management has until now a national focus and was based on short-term objectives that only deepened the crisis, further deteriorating the environmental, social and economic conditions of the fisheries. **The EU in particular is responsible for this bleak situation:** it is the main fishing actor in terms of volume, fleet size and capacity; and the exploitation of Mediterranean fisheries resources exclusively under EU competence is on average three times higher than sustainable levels¹. While recognising the specificities of the Mediterranean Sea and its fisheries, the so-called "Mediterranean particularity" cannot any longer be an obstacle for the EU to take immediate action to revert the declining trend of its stocks.

Under these conditions, some inspiring bottom-up initiatives (participative management) are demonstrating that social, economic and environmentally sustainable fisheries are possible in the region. This WMedMAP should incorporate those positive initiatives, and adapt governance to a more participatory approach.

The first demersal WMedMAP is of paramount importance and should mark a milestone for a recovery of the stocks and ecosystems in the region. It covers commercially important species, some of which are overfished up to 10 times the estimated sustainable levels such as hake, red mullet and anglerfish. It aims at tackling the main drivers of the overfishing problem in the area: **the excessive fishing mortality coupled with an ineffective regulatory framework.**

Environmental NGOs urge you to seize this unique opportunity to **adopt an ambitious WMedMAP that reduces negative impacts on ecosystems, sensitive habitats and essential fish habitats (juveniles and spawners areas); incentivise best practices as well as give preferential access to well-managed low impact small scale fisheries,** which represent the largest fleet and employment in the region.

It is not only a political responsibility for the EU, but also a legal obligation under the CFP to restore and maintain all fish stocks above levels capable of producing MSY. The same obligations apply to all EU regions, and the Mediterranean region can no longer postpone its efforts. Decision makers must ensure that there is a level playing field at EU level for EU fishers in all sea regions. The EU has no other choice than leading the agenda of sustainable fisheries in the Mediterranean, and must seized the chance of succeeding also by implementing the "MedFish4Ever" Ministerial Declaration³.

¹ Monitoring the performance of the Common Fisheries Policy (STECF-17-04).

² Scientific, Technical and Economic Committee for Fisheries (STECF) – Western Mediterranean Multi-Annual Plan (STECF-15-09)

³ Malta MedFish4Ever Ministerial Declaration (Malta, 30 March 2017)

SPECIFIC RECOMMENDATIONS

1. Spatial management measures

- **Increase the trawl-free zone all year-round to at least 100m depth.** This measure is a key priority to ensure an effective protection of juvenile fish aggregations from key demersal stocks⁴, in particular mullets, seabreams and horse mackerel nurseries. Reducing fishing mortality of young fish is key to restoring productivity and rebuilding stocks. It will also ensure preferential access to small scale fisheries in coastal waters (in line with art. 17 of the CFP) which - if properly managed - would strengthen the protection of sensitive habitats from destructive gears (especially on maërl and coralligenous beds⁵). The proposed trawl restriction period of 3 months is grossly insufficient to protect the coastal zone, the most sensitive part of the EU waters⁶, as a temporary protection will not effectively protect sensitive habitats nor low impact fisheries.
- **Protect Essential Fish Habitats (EFH) and Sensitive Habitats (SH) in deeper areas.** Ensure that areas deeper than 100m, with scientific evidences of EFH presence such as juveniles or spawning aggregations of demersal species, such as hake, Norway lobsters or shrimps, are permanently or temporally closed to fisheries in line with article 8 of CFP⁷. Those additional closure areas should particularly focus on stocks suffering from high exploitation or high discard rates. Solid scientific evidence exists for protecting several areas already, that should be designated under the WMedMAP (e.g. Ebro River Delta, Gulf of Lion, Carloforte Shoal). Specific fisheries closures should also be adopted to protect SH, which includes Vulnerable Marine Ecosystems (VME), like crinoid beds, cold water corals, gorgonian and coral gardens where they occur below 100m depth.

2. Fishing Opportunities: Efforts and catch limits

The “Mediterranean fisheries paradigm”, under which only effort controls (mainly “days at sea”) and technical measures have been accepted as management tools, should be changed as they have proven to be grossly ineffective and fishing mortality has remained very high over the past decades⁹. In practice, no adequate effort management regime has been implemented in the region, while enforcement has also been always weak. To ensure a level-playing field and achieve the same objectives in all EU sea-basins, an effective fishing effort regime must be implemented, together with complementary catch limits when scientific evidence demonstrates their likely contribution to the recovery of stocks.

In this regard we consider that:

- **Proposed fishing effort regime categories should follow STECF advice.** STECF states that the two effort groups proposed in annex I are based on economic and practical considerations linked to the Data Collection Framework (DCF), and are not appropriate for effort management⁸. Instead,

⁴ Spedicato, M. T. (2016). Study on the Evaluation of Specific Management Scenarios for the Preparation of Multiannual Management Plans in the Mediterranean and the Black Sea. CALL MARE/2014/27, CONTRACT NUMBER-EASME/EMFF/2014/1.3. 2.7/SI2. 703 193. Final Report.

⁵ Art. 4 of Council Regulation (EC) No 1967/2006, so called “MedReg”.

⁶ Colloca F, Scarcella G and Libralato S (2017) Recent Trends and Impacts of Fisheries Exploitation on Mediterranean Stocks and Ecosystems. *Front. Mar. Sci.* 4:244. doi: 10.3389/fmars.2017.00244

⁷ According to CFP art. 8, Member States have the obligation to identify and protect fish stock recovery areas, including spawning grounds and areas with evidence of concentrations of fish below minimum conservation reference sizes. This measure is very poorly implemented.

⁸ STECF – 55th Plenary Meeting Report (PLEN-17-02); EUR 28359 EN; doi:10.2760/53335

scientists propose alternative, more realistic effort groups disaggregated into four categories to fit with the current depth ranges stocks assemblages and their respective fisheries:

- coastal area (up to 100 m): mainly targeting mullets;
 - continental shelf (100-200 m): mainly targeting hake and deep water rose shrimps;
 - upper slope (250-400m): mainly targeting Norwegian lobsters;
 - deep waters (500-1000 m): mainly targeting blue and red shrimps.
- **Introducing a catch limit regime will deliver best the CFP objectives.** An effort regime alone may be insufficient to bring down fishing mortality, as drastic reductions are needed to rebuild stocks⁹. As noted by STECF, “limiting the time allowed to fish lead to an investment in equipment to catch more fish at the same amount of time”⁹. Management scenarios to achieve MSY by 2020 for demersal stocks estimated the fishing mortality reduction needed to be between 61% and 93% according to stocks and areas⁵. Consequently, introducing catch limits is urgent for fisheries targeting specific stocks (e.g. some shrimp fisheries), and where an effort regime has proven ineffective. The WMedMAP should therefore introduce as a precautionary measure TACs for stocks with available scientific advice. Fishing opportunities should be incentivised to respect the principles set in Art.17 CFP, incorporating environmental and social criteria to ensure fair allocations.

3. Governance

- **Improve management of small-scale fisheries to deliver low impact fisheries.** Small-scale fisheries predominate in the Mediterranean Sea, accounting for 80% of the fleet. Empowering and integrating them in management programs is essential to achieve the objectives set in the WMedMAP. Small-scale fisheries are however not necessarily a synonym for low impact fisheries as they often face mismanagement, lack of reporting and compliance issues, and their operations therefore need to be properly managed. The management rules applying to small-scale fisheries must be consistent with the conservation objectives of the WMedMAP, which must specify measures to avoid the catches of juveniles, to protect habitats and ecosystems, or to avoid the loss of fishing gears, among others.
- **Encouraging participative management and implementation at local level.** Fishers, in collaboration with other stakeholders, are essential to engage directly in the fisheries management process. Wide consensus at local level will radically improve compliance through peer pressure and provide a comprehensive understanding of fisheries’ characteristics, as well as identify the measures needed to deliver the WMedMAP. Once agreed at local level, these measures should be proposed at national level to be adopted under the regionalisation procedure at EU level. Several examples already exist where the co-management approach demonstrated its social, ecological and economic value^{9,10}. The WMedMAP should therefore encourage the creation of fisheries co-management bodies at local level to increase co-responsibility of local actors and propose solutions to local challenges.

⁹ Successes and challenges of the Catalan sand-eel fishery co-management committee at GFCM Symposium in Algeri

¹⁰ First Regional Symposium on Sustainable Small-Scale Fisheries in the Mediterranean and Black Sea-<http://www.fao.org/3/a-i4861e.pdf>