

## Opinion of the Mediterranean RAC on a possible differentiated regime for small-scale coastal fisheries

1. The Mediterranean RAC, even if complains about the poor consideration of Mediterranean Sea in the Green Paper, has taken due note of the Commission's intention to consider introducing a differentiated regime, focusing on social objectives, for protecting small-scale coastal fleets, as well as introducing a system of direct allocation of quotas or of fishing effort or other collective mechanisms. This segment could also benefit from public funding in order to enable its adaptation to the future CFP. The CCR is favourable to such an orientation which could also enable the CFP to be better adapted to the specificities of the Mediterranean fisheries. On the other hand, Commission does not plan to grant special rules on conservation or control. It is therefore of primary importance to discuss precisely the characteristics of small-scale coastal fisheries in line with regional and local realities.
2. Small-scale fisheries production systems are often vulnerable because highly dependent on the evolving quality and quantity of catches, with a direct effect at the economic level. In turn, catches depend on marine ecosystems, which need to be healthy. For all these reasons, it is important to pay particular attention to small-scale coastal fisheries.
3. The only current element of definition is found in Article 26 of the EFF Regulation which defines *small-scale coastal fishing* as "fishing carried out by fishing vessels of an overall length of less than 12 metres and not using towed gear as listed in Table 3 in Annex I of Commission Regulation (EC) No 26/2004 of 30 December 2003 regarding the fishing vessels register of the Community".
4. After studying the issue in many forums (seminars organised by the Commission and internal groups of our member organisations), it appears that the ambition of a having a single definition of criteria common to all segments of the fleet in Europe is simply impossible, given the many regional, if not local, socio-economic and environmental features.

5. As indicated above, it is difficult to agree on a single definition of small-scale coastal fisheries at the European level because of the variety of segments that fall under this heading. Among the criteria often cited to define small-scale inshore fisheries, we can mention: environmental and resources impact, overall length, gross registered tonnage (GT), power (KW), distance from the shore or from the base port at which the vessel operates, the number of onboard personnel, number of continuous days at sea, volume and capital structure of the owning company, reference market (fresh, local, export, deep-frozen), presence or not of the owner on board, business type (sole proprietorship, SME, cooperative, PO, remuneration system, etc.). However, the use of a limited number of physical parameters may prove to be inappropriate if we want a future CFP that is simple and consistent. Indeed, these criteria may be mutually exclusive in some segments of the fleet in Europe.
6. In addition, it should be noted that the Green Paper omits the question of gender in the future CFP in spite of the fact that women are an integral part of the activity of family fisheries undertakings in the Mediterranean Sea. Despite the EC Directive 86/613, which recognizes women's status of collaborator in the family fishing business, some Mediterranean Member States have not yet implemented the Directive and the recognition of this status. The Mediterranean RAC calls on the Commission to put pressure on the Member States concerned to recognise at national level the status of women in family businesses, in particular as the role played by women goes far beyond working within the business; they are the custodians of the values and traditions of their region.
7. By way of conclusion, the Commission's (top-down) approach regarding a possible differential regime applicable in future to small-scale coastal fisheries is still too attached to the outdated spirit of the current CFP. The 'top-down' approach is, in our view, far from the specific realities on the ground and the daily management of fisheries.
8. Therefore, the Mediterranean RAC is of the opinion that the Commission should :
  - a) move towards a generic definition or towards guidelines on small-scale coastal fisheries at Community level. It makes more sense for Member States to then establish more detailed criteria for definition in the light of these generic guidelines, on the basis of the long term management plans, respecting local fleet characteristics and in conformity with the subsidiarity principle referred to in the Green Paper;
  - b) the Mediterranean RAC also calls for the maintaining of the 12 mile zone in order to protect the fragile coastal strip;
  - c) regarding recreational fisheries which is mainly active in the same area as the small coastal fisheries (12 mile zone), the Commission should adopt, a sector legislation so that Member States would be able to define in the short term, the rights and obligations of the recreational fishermen by means, for instance, of a generalized licence system for those entitled for a better management of the catches through gears revision as well as the total ban on trading the catches;



- d) develop in the framework of the new Integrated Maritime Policy of the European Union, initiatives aiming at controlling and minimizing the impact on the marine environment of other human activities (transports, sources of pollution in urban areas, agriculture, industry, uncontrolled constructions on the coast, extractive activities, etc.) and even through Marine Space Planning;
9. The Mediterranean RAC's approach is more compatible and consistent with decentralized decision-making which is the direction in which things appear to be moving in the Green paper, in particular on technical aspects. Regarding this point, the Mediterranean RAC recalls its opinion adopted on occasion of the Executive Committee held in Marbella on 8 June 2010 and particularly the impact evaluation and an urgent review of the Reg. 1967/06 which could allow, thanks to the scientific opinions, to justify and to evaluate technically and scientifically those measures causing more problems (filament thickness, minimum cod-end size, distance from the coast, minimum size, etc.).
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