

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

Fields marked with * are mandatory.

Background:

In the Mediterranean Sea, the first EU multiannual plan under the reformed CFP was adopted for demersal stocks of the Western Mediterranean Sea in July 2019 via Regulation (EU) 2019 /1022 ("the MAP").

The MAP's objectives are: to contribute to the achievement of the objectives of the CFP; to aim to ensure that the populations of living marine biological resources are at sustainable levels (i.e. above levels which can produce MSY); to contribute to the elimination of discards by avoiding and reducing unwanted catches and by implementing the landing obligation for the relevant species; and finally to implement an ecosystem-based approach so as to minimise negative effects of fishing activities on the marine ecosystem.

The MAP provides that the Commission should report to the European Parliament and to the Council on the results and impact of the MAP on the stocks concerned and on the fisheries exploiting these stocks in particular as regards the achievement of the MAP's objectives.

In this context, the Commission would like to consult the most relevant stakeholders, i.e. the members of the PescaMed Member States group and the members of the Mediterranean Sea Advisory Council on their respective assessment of the MAP's performance in meeting its objectives.

*** 1) Who are you?**

- individual member of MedAC
- PescaMed representative
- Member State administration
- other
- MedAC

2) 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,

- *has the existence of a MAP facilitated the process of setting of fishing opportunities for the relevant stocks?*

- significantly
- a little
- not much
- not at all
- counterproductive
- no opinion

- *to what extent has the MAP contributed to increasing the number of stocks at MSY?*

- significantly
- a little
- not much
- not at all
- counterproductive
- no opinion

- *has the MAP helped in dealing with overfished species such as European hake or other stocks?*

- significantly
- a little
- not much
- not at all
- counterproductive
- no opinion

- *do you have specific management suggestions to address the specific case of European hake?*

Percentages question 2a) significantly 6% - a little 19% - not much 19% - not at all 6% - no opinion 50%

Percentages question 2b) significantly 31% - a little 50% - not much 6% - not at all 13%

Percentages question 2c) significantly 44% - a little 38% - not much 6% - not at all 13%

OP du Sud – France and UNACOMAR – Spain;

- The selectivity and the increase of the MCRS 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 – CONFCOOPERATIVE FEDAGRIPESCA e LEGACOOP 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 jeopardize 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 percent of the total catches in euros.

- The MSY achievement in 2025 is not possible, as recognized 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.

3) On selectivity, discards and the landing obligation, in your opinion:

- to what extent have discards been reduced and the landing obligation been implemented?

- significantly
- a little
- not much
- not at all
- counterproductive
- no opinion

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

- significantly
- a little
- not much
- not at all
-

counterproductive

no opinion

- to what extent do you support more selectivity measures?

significantly

a little

not much

not at all

counterproductive

no opinion

- if yes, which selectivity measures do you support specifically?

Percentages question 3a) a little 13% - not much 13% - not at all 19% - counterproductive 56%

Percentages question 3b) a little 19% - not much 31% - not at all 13% - no opinion 38%

Percentages question 3c) significantly 13% - a little 19% - not much 6% - not at all 63%

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 – CONF COOPERATIVE FEDAGRIPESCA and LEGACOOP AGROALIMENTARE - Italy and CNP MEM - CRP MEM PACA - CRP MEM OCCITANIE - CRP MEM 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 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.

4) On the ecosystem-based approach, in your opinion:

- *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
- a little
- not much
- not at all
- counterproductive
- no opinion

- *to what extent have the closure areas contributed to the current situation?*

- significantly
- a little
- not much
- not at all
- counterproductive
- no opinion

- *to what extent has the MAP contributed to the current situation?*

- significantly
- a little
- not much
- not at all
- counterproductive
- no opinion

- *do you have specific comments on this point?*

Percentages question 4a) significantly 38% - a little 25% - not much 31% - counterproductive 6%

Percentages question 4b) significantly 56% - a little 38% - not at all 6%

Percentages question 4c) significantly 38% - a little 50% - not much 13%

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 – CONFCOOPERATIVE 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 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 (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 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 (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.

5) On Control and enforcement, in your opinion:

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

- significantly
- a little
- not much
- not at all
- counterproductive

no opinion

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

Percentages question 5a) significantly 25% - not much 13% - no opinion 63%

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.

- 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.

- Are there specific control measures 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.

6) On regional cooperation, to what extent has the MAP in your opinion strengthened regional cooperation, including with stakeholders?

significantly

a little

not much

not at all

counterproductive

no opinion

- do you have specific comments on this point?

Percentages question 6a) significantly 6% - a little 75% - not much 6% - not at all 13%

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 emphasizes 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 prioritized.

WWF

- Consultation at national level is weak in some cases.

7) On the socio-economic impact of the MAP, in your opinion:

- 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?

significantly

a little

not much

not at all

counterproductive

no opinion

- 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?

significantly

a little

not much

not at all

counterproductive

no opinion

8) What is your overall assessment of the Western Mediterranean MAP?

very beneficial

- beneficial
- neutral
- negative
- very negative
- no opinion

9) Do you have final comments?

Percentages question 7a) a little 6% - not much 6% - not at all 75% - counterproductive 6% - no opinion 6%
 Percentages question 7b) a little 13% - not much 13% - not at all 56% - counterproductive 13% - no opinion 6%

Percentages question 8a) beneficial 6% - neutral 19% - negative 50% - very negative 19% - no opinion 6%
 CNPMMEM - CRPMMEM PACA - CRPMMEM OCCITANIE - CRPMMEM CORSE – France - AGCI-AGRITAL –
 CONFCOOPERATIVE 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 analyze 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.

Contact

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