

Ref.:249/2023

Rome, 7 November 2023

Charlina Vitcheva  
Director General  
DG MARE (Maritime Affairs  
and Fisheries)

**Subject:** Reply to DG MARE letters Ref. Ares(2023)5360712 - 02/08/2023 and Ref. Ares(2023)5957954-01/09/2023

Dear DG Vitcheva,

I would like to thank you for your letter Ares(2023)5360712 in relation to the GFCM Working Group on Management Strategy Evaluation (WGMSE) on Adriatic small pelagics.

As you might be aware, the actions to be performed for the stakeholder involvement in the Management Strategy Evaluation (MSE) endorsed by the SAC June 2023 session have not yet started. The SAC Final Report 24, in the Section “Management strategy evaluation actions (2023-2024 SAC intersession)”, foreseen that the first Stakeholder consultation should have been started in July to be completed in October 2023. This step should be followed by an iterative presentation from November 2023 to February 2024. This long period of consultation of stakeholders has been recommended by the MEDAC on the basis of the MEDAC advice (Ref. 73/2023, Ref. 154/2021 and Ref. 208/2021) presented during the GFCM Sub Regional Committee on Adriatic Sea. In fact, the key point for a true stakeholder’s consultation is that the information, at the basis of the management decisions to be taken, should be clear and understandable to all the stakeholders participating to the process. The previous experience managed in the MEDAC on the MSE process of bluefin tuna made evident the difficulties in sharing clear information on decisional steps of MSE. So, enough time is needed to assure a transparent process. **Although the SAC24 agreed on this needed timeframe by endorsing a period of 4 months for the first stakeholder consultation, 3 months already passed without any reply to the MEDAC requests to start the informative step.**

Concerning your invitation to present “*Population models incorporating trophic effects, pollution, or environmental factors, if available for these two Adriatic stocks, [...] to GFCM Working Groups on Stock Assessment of Demersal Species (WGSAD) for evaluation in future benchmark assessments*” I suppose that you were referring to the **WGSASP (GFCM Working Groups on Stock Assessment of Small Pelagics)**.

Moreover, considering your suggestion on Ref. Ares(2023)5957954-01/09/2023, the MEDAC will deepen the results of the ecosystem approach in the Adriatic and other factors impacting the small pelagics stocks (climate effect and *Mnemiopsis leidyi*) and it will support the presentation of such scientific work in GFCM for formal evaluation by the Sub Regional Committee for the Adriatic (SRC-



AS) and SAC. In fact, during the FG Adriatic meeting held on October 12, the scientific expert Paolo Paliaga (University of Pula) presented the attached slides on “Invasive *Mnemiopsis leidyi* in the North-eastern Adriatic Sea effects on the ecosystem and possible solutions”. The following debate highlighted that the phenomenon of this invasive species does not affect the Adriatic Sea only, but it is also impacting other areas in the Mediterranean Sea.

I look forward to more information from DG MARE on the next steps for a true stakeholder’s involvement in the MSE process and for possible harvest control rules for these two important small pelagics in the Adriatic. In fact, the MEDAC wants to provide a constructive support to the GFCM working group on management strategy evaluation (WKMSE) work in the coming months.

Yours sincerely,



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Chair of MEDAC





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