



To: Sr. Raul Delgado
Commission Chair
International Commission for the Conservation of Atlantic Tuna

13 October 2018

Estimado Señor Delgado

Access to Bluefin Tuna for Small-Scale, Low Impact Fishers.

The Low Impact Fishers of Europe (LIFE) Platform provides a dedicated voice, both at European and international level, for European smaller-scale fishers who are committed to fishing in a manner that minimizes their impact on the environment. LIFE Platform is an organization of 30 organizations, representing some 10,000 fishers from the Baltic to the Black Sea.

LIFE welcomes the EU's Draft Recommendation to ICCAT on establishing a Multi-annual Management Plan for Bluefin Tuna in the Eastern Atlantic and the Mediterranean (Doc. No. PA2-605 / 2018). We are particularly pleased that to note that the Draft Recommendation recognizes the injustices suffered by the small-scale fleets and the intention to redress these.

The Mediterranean small-scale coastal fishing fleet is by far the largest fleet segment. In the Mediterranean and Black Sea this constitutes over 84 percent of the fishing fleet and 44 percent of fishing capacity, employing at least 62 percent of the total workforce onboard fishing vessels and accounting for approximately 24 percent of the total landing value from capture fisheries in the region.

Until 2006, the Mediterranean and other small-scale fleets were permitted to catch Bluefin tuna, which provided a significant seasonal source of income for them, and an important opportunity to reduce their efforts on other stocks. We feel they have been unfairly discriminated against, and their future prospects undermined by the 2006 ICCAT Bluefin tuna recovery plan (the BfT Plan).

Since 2006, under the ICCAT BfT plan, small scale fishers have been effectively stopped from catching Bluefin tuna, with the consequent loss of an important source of income. This has meant that they have had to fall back on other, lower value species, with a consequent decline in their incomes and an increase in pressure on other stocks. Despite Article 17 of the CFP, and Article 8 of EU's Bluefin tuna multiannual plan regulation which call for a fair distribution of national quotas across fleet segments and for incentives to be provided for selective and low impact fishing, this unfair situation is repeated across EU Member States. The EU's Bluefin tuna multiannual recovery plan for bluefin tuna (Regulation (EU) 2016/1627) also stresses the importance of promoting coastal fishing activities, including in traditional and artisanal fisheries.

Recently, the EU and other Mediterranean states have promoted specific policy objectives to ensure "equitable access to living marine resources that should be based on sustainable fisheries and their socioeconomic role" and "preferential access for sustainable and low impact small scale fisheries along the coastal band" through the 2017 MedFish4Ever Declaration and 2018 Regional Plan of Action for Small-scale Fisheries in the Mediterranean and the Black Sea.

After ten years of implementation of the BfT plan, the outcomes of the stock assessment in 2017 allowed ICCAT to adopt the Recommendation 17-07 amending the BfT plan in the Eastern Atlantic and Mediterranean, where the Total Allowable Catches (TAC) that was increased from 23,655 tons in 2017 to 28,200 in 2018, 32,240 in 2019 and 36,000 tons in 2020, marking the highest TAC ever set for the Bluefin tuna. Such an increase of more than 60% by volume in just three years needs to be managed carefully in order to prevent undermining the long-term sustainability of Atlantic Bluefin tuna fisheries.

The recovery of Bluefin tuna stocks and the increase in the TAC allocated to Europe from ICCAT provide the opportunity to end the unfair discrimination against small-scale fishing activities, to alleviate the economic difficulties experienced by many small-scale fishers, and to take the pressure off other fish stocks in the Mediterranean. In this regard, the strategic importance of Bluefin tuna to alleviate the general state of overexploitation in the Mediterranean, in line with the MedFish4ever Declaration, can't be underestimated.

The small-scale fishers are ready to play their part in implementing the necessary management and control measures needed to assure that their activities contribute to achieving social, economic and environmental sustainability. Therefore LIFE stresses that a fair proportion of the annual increase of quota should be allocated, directly from ICCAT and ring-fenced, to small scale and low-impact fisheries that comply fully with the current Monitoring, Control and Surveillance (MCS) framework.

Here below, LIFE would like to provide some other comments to the EU's Draft Recommendation (Doc. No. PA2-605 / 2018):

- **Definitions (Paragraph 3.x.).** We support the introduction of a multi-parametric definition for 'small-scale coastal vessel' for the purpose of this recommendation. In our view, the gear utilized for the fishery is an important determinant of both the fishing effort on the Bluefin tuna and the wider environment, and an indication of the small size of the enterprise. The fishing gear should therefore be included as an obligatory criterion in the definition. "Hand line" and "pole and line" gears have the lowest impact on the environment and least by-catch compared to other gears that target Bluefin tuna. Operations using these gears are also likely to have the greatest socio-economic needs, and therefore fishery operations using these gears should have priority to quota. We feel that the characteristic of using techniques which are selective and have a reduced environmental impact is too vague to be workable.
- We therefore suggest that, for the purposes of allocating Bluefin tuna quota to small scale fleets, the definition of small-scale tuna catching vessel should be as follows (in Paragraph 3.x.):
A small-scale coastal vessel is owner-operated, using hand line or pole and line with at least three of the four characteristics listed: a) length overall <12 m; b) the vessel is fishing exclusively inside the territorial waters of the flag CPC c) fishing trips with a duration of less than 24 hours, or d) the maximum crew number is established at four persons.
- The term "small-scale coastal" should be used throughout the Recommendation in place of other synonymous terms, such as "coastal artisanal".
- **Fishing capacity** (Paragraph 17). While recognizing that the elimination of the 5-tonne requirement will provide a more inclusive basis for small-scale fleets to benefit from increased tuna quotas distributed to Member States, this does not fully protect the small-scale fishers from the potential negative impacts of tradeable quotas and the concomitant marginalization that tends to accrue from such market-based quota allocation mechanisms. Hence, a specific clause to prohibit transferability should be included to ensure that new quota transferred to

Member States for small scale coastal fishing is non-transferable to other fleet segments with vessels longer than 12m, including purse seiners and large-scale long-liners.

- Furthermore, under point 18, we are concerned that a variation of 20% adjustment of fishing capacity for purse-seiners will be too high and we would like to stress the importance to maintain fishing capacity so that they are commensurate with the TAC. The proposed extension of the purse seine season must be taken into account in this regard. Projections from the 2017 assessment indicated that quota reductions will be required in the future if a FO.1 strategy is continued, and it wouldn't be prudent to increase fishing capacity, only to have to reduce it again in the coming years.
- **Technical measures.** Open fishing seasons Paragraphs 25 – 27). LIFE agrees with the proposal that fishing for Bluefin tuna throughout the year should be permitted for vessels categorized as “small-scale coastal”. However, the proposed measure to extend the purse seine season should not be permitted since many vessels catch their quotas in less than a week and this just opens the possibility to significantly increase the fishing effort from this segment.
- **Minimum size** (Paragraph 28 – 30): LIFE advises that the minimum size provisions shouldn't change from the previous recommendations and should not be weakened by any minimum size derogation, to prevent targeting of smaller juveniles.
- **By-catches** (Paragraph 32). Finally, LIFE would like to stress that there should be no increase of allowed bycatch from 5% from Rec 14-04 up to 20%. Such an increase is tantamount to allowing a targeted catch of Bluefin tuna. For small scale coastal vessels, the 5% restriction should be based on the number or volume of pieces of tuna and non-tuna species in the catch that fall outside the jurisdiction of ICCAT.

With my best regards for a successful outcome of the 21st Special Meeting of the Commission

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. O'Riordan', with a stylized flourish at the end.

Brian O'Riordan
Deputy Director