

Dear Member of the European Parliament,

Multi-annual plan for the fisheries exploiting demersal stocks in the western Mediterranean Sea.

I write to you on behalf of the Low Impact Fishers of Europe (LIFE) Platform concerning the legislative proposal before you for a regulation establishing a multi-annual plan for the fisheries exploiting demersal stocks in the western Mediterranean Sea (West Med MAP) that will be voted the following January 10th 2019.

The vote on amendments to the EC's regulatory proposal has been postponed due to the pressure of certain organisations of the large scale fishing sector. The small-scale passive gear coastal fleet segment (which represents around 80% of the fleet by numbers and 60% of the at sea employment) is concerned that any further delay could jeopardize the approval of this plan before the end of the legislature, which would perpetuate the status quo in the Mediterranean, making the risk of collapse of Mediterranean fisheries ever more possible, which would have a devastating impact on coastal communities, the economy and food security of the entire region. **Therefore, we urge you to do everything within your powers to ensure that the vote is not delayed further.**

Also, we would like to outline the amendments that LIFE considers priority and which we encourage you to support. They are directed at the following aspects:

1. Co-management of designated small-scale coastal fishing/ inshore fisheries areas

The MAP should include specific provisions for the management of small-scale fisheries incorporated into small-scale in-shore fishery management plans. These should be designed and managed at local level through co-management arrangements that guarantee the polyvalence of this subsector. The work of the Nobel Prize winning economist Elinor Ostrom and others have demonstrated that if certain key principles are respected, co-management can be an effective tool for managing common pool resources, including fisheries, with a consequent improvement in governance. The establishment of multi-stakeholder groups at local level (co-management committees) will enable the effective adaptation and implementation of fisheries management, including the design and implementation of the necessary management measures. As well as providing the possibility to incorporate local knowledge, such an approach will lead to a greater sharing of responsibilities for sustaining marine resources, and a fairer allocation of access rights.

The empowerment of small scale fishers to engage in the participative management of fisheries in order to strengthen governance is a key element of the *MedFishForever* Ministerial Declaration signed in Malta in 2017. Co-management has also been developed locally in various parts of Europe, including in the Mediterranean, with significant results. It is now incorporated into law under governmental decree in Catalunya, and this could provide a model for guiding the application of co-management at regional level.

There are several amendments by different MEPs supporting this approach, adding new paragraphs in Article 2 (Definitions) and in Article 9 (Obligations of Member States). We encourage you to endorse them by voting in favour of:

- Article 2 (Definitions): Any of the **Amendments 150 or 152, and**
- Article 9 (Obligations of Member States): Any of the **amendments 235, 237 or 238**

2. Effort based fisheries management, with input controls

Multiannual Management Plans (MAP) for the demersal fisheries in western EU waters (W-Med MAP)

Assuming that this MAP will be approved later this year (2019), and given that the deadline to reach internationally agreed sustainability (MSY) targets is just one year later (2020), we are concerned that achieving these international MSY objectives under this MAP may impact negatively on the fishing sector. In our view, there should be flexibility in the provisions of the MAP to mitigate the impact of effort management on socioeconomic sustainability. Therefore, we propose to support the following amendment:

- Article 4 (targets): **Amendment 171**

The application of a TAC/Quota system across all fisheries in the Mediterranean, especially demersal fisheries, will not be appropriate, given their highly diverse and multi-specific nature, and the polyvalent nature of small-scale fisheries. A TAC/quota based fishery management system would also give rise to significant problems associated with discards. There may also be unforeseen detrimental consequences for small scale fisheries, given the tendency for quotas to be privatized through informal and unregulated markets and associated speculation, and concentration of quota by a few larger companies.

There are several amendments by different MEPs supporting this aspect, addressed by the following amendments, which we ask you to vote for:

- Article 8 (Total allowable catches): Any of the **Amendments 219, 220, 222 or 225**.

In the last decades the Mediterranean SSF has faced increased competition with industrial fisheries active in the coastal areas, particularly bottom trawlers, that not only affects coastal stocks' productivity, produce a high level of discards and exert serious impacts on the seafloor, but often interfere with the SSF fishing activity.

It is therefore imperative that the coastal zone be reserved for small scale, low impact and selective gears to protect juvenile aggregation grounds, sensitive habitats and the livelihood of coastal communities that rely on SSF. Last September a Regional Plan of Action (RPOA) for SFF in the Mediterranean and the Black Sea ([GFCM RPOA-SSF](#)) was adopted by Fisheries Ministers of the Mediterranean and the European Union (EU). The RPOA will introduce specific rules *"to ensure preferential access to sustainable, low impact small scale fisheries in the coastal band"* (Action 10 of the RPOA-SSF). The WestMedMAP is the first opportunity to introduce concrete measures to safeguard small scale, sustainable and low impact fisheries in the Mediterranean, by ensuring preferential fishing access in coastal waters. A three-months ban on bottom-trawling inside waters of 100m depths was proposed, however this is grossly insufficient to alleviate the pressure from industrial trawlers on coastal fish stocks and habitats. In this respect Mediterranean SSF called on Members of the European Parliament to defend them by supporting a permanent full-year ban on trawling either in the coastal waters up to 100m depths or within 8 miles from the shore according to local bathymetric conditions, which would help rebuild coastal stocks and secure better economic outcomes in the medium term. We encourage you to endorse this approach by voting on:

- Article 11 (Technical conservation measures): **Amendment 244** (rejecting Compromise amendment 18).

We call on you to seize this opportunity to revert the dire situation in the Mediterranean Sea fisheries and prevent SSF from disappearing for good. It is your legal duty to ensure that the Mediterranean fish stocks are recovered, for the present and the future generations.

We remain at your disposal for further comments and considerations. We would also be delighted to meet with you to discuss face to face these proposed amendments and the reasoning behind them.

Best wishes,



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As a **resume** please find here the list of priority amendments that LIFE encourages you to vote, for the benefit of both the Mediterranean fisheries and fishing communities:

- Article 2 (Definitions): Any of the **Amendments 150 or 152**
- Article 4 (targets): **Amendment 171**
- Article 9 (Obligations of Member States): Any of the **Amendments 235, 237 or 238**
- Article 8 (Total allowable catches): Any of the **Amendments 219, 220, 222 or 225.**
- Article 11 (Technical conservation measures): **Amendment 244** (rejecting Compromise amendment 18).