Case Id: 3404d1ca-abc9-48cd-86a7-6bd2053ec3da

Date: 16/09/2016 12:38:06

Multiannual plan for the fisheries exploiting demersal stocks in the Western Mediterranean Sea

Fields marked with * are mandatory.

Introduction

The new Common Fisheries Policy (CFP) establishes the objectives and means for ensuring sustainable fisheries, including achieving exploitation rates consistent with the maximum sustainable yield (MSY) at the latest by 2020 for all stocks. It also introduces a landing obligation, which means that unwanted catches of species that are subject to catch limits and, in the Mediterranean Sea, also catches of species which are subject to minimum sizes as defined in Annex III to the Council Regulation (EC) No 1967/2006 can no longer be discarded. The entry into force of this obligation is phased in according to a specific calendar but the latest deadline is 1 January 2019. Furthermore, the CFP pursues coherence with the objective of achieving good environmental status (GES) as required by Directive 2008/56/EC of the European Parliament and of the Council (Marine Strategy Framework Directive).

Multiannual plans are a priority instrument in the CFP to address the challenges of fisheries management. For mixed fisheries or where the dynamics of stocks relate to one another, multiannual plans should cover fisheries exploiting several stocks in a relevant geographical area and take into account available knowledge about interactions between stocks, fisheries and marine ecosystems.

There have already been a number of discussions with stakeholders on the ways to address the challenges to implement the new CFP in the Mediterranean Sea, among others in the Western Mediterranean area. Possible approaches include either the revision of current national management plans adopted under the MEDREG or the development of an EU multiannual plan to manage the fisheries exploiting demersal stocks in the Western Mediterranean.

In this context, the services of the Directorate-General for Maritime Affairs and Fisheries (DG MARE) of the European Commission are now launching a public consultation on the management options for the fisheries exploiting demersal stocks in the Western Mediterranean Sea. Anyone with an interest in the topic is thus invited to express their views on the questions identified in the online questionnaire, as well as to present their opinions as to what additional measures could be appropriate to manage demersal stocks in the aforementioned area.

The content of this online questionnaire does not prejudge the views, positions or any decision to be taken by the Commission on the subject. The Commission cannot be held responsible for any use that might be made of the information contained therein.

How to respond

This consultation is open until 16 September 2016.

The online questionnaire is initially published in English; other language versions will be uploaded by the end of June 2016. The respondents are invited to reply in English, French, Italian or Spanish.

Operational aspects: (i) before starting, we suggest you to consult the background document and the questionnaire in PDF format; (ii) when answering a question, you will be asked to tick one or select the level of importance depending on the question. You will also be able to add comments. You can pause and save your work and continue later; (iii) you will also be able to download an electronic copy of your contribution once you have submitted it.

The Commission service responsible for the consultation:
Directorate-General for Maritime Affairs and Fisheries (DG MARE)
Unit D2 "Fisheries conservation and control Mediterranean and Black Sea"
e-mail: MARE-WESTERN-MEDITERRANEAN@ec.europa.eu

Files:

Background_Document.doc
Questionnaire EN.pdf

Questionnaire

A. Information about the respondent

- * 1. Are you responding to this questionnaire as:
 - A private individual
 - A representative of an organisation/company/institution
- *2. Please enter your name or the name of your organisation e.g. Charles DARWIN

Low Impact Fishers of Europe Platform (LIFE)

*3. Please enter your e-mail address (this data will not be made public)

med@lifeplatform.eu

*4. Please indicate the type of organisation represented

- Not applicable (private individual)
- Government institution/Public administration
- Research institute/Academic institution
- Non Governmental Organisation
- Advisory Council
- Fishermen association
- Catching sector
- Processing sector
- Other

4a.Transparency Register ID

If you are answering as an organisation/company/institution, please provide your Register ID number. You can also register here. If your organisation/company/institution responds without being registered, the Commission will consider its input as that of an individual and will publish it as such.

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*5. Please enter your country of residence or where your organisation is based.

United Kingdom

*6. Please indicate your preference for the publication of your contribution on the European Commission's website.

Please note that regardless the option choses, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

- Under the name given: I consent the publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Anonymously: I consent the publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Please keep my contribution confidential (it will not be published, but will be used internally within the Commission).

B. Fisheries exploiting demersal stocks in the Western Mediterranean Sea

- * 1. To what extent do you agree or disagree with the perception of the problem described in the background document (i.e. "high levels of overfishing and limitations of the current management framework")?
 - Strongly agree
 - Agree
 - Neutral
 - Disagree
 - Strongly disagree
 - Don't know
- 2. Are there any other aspects that you consider should be taken into account when defining the problem?

Yes, other important elements than the ones strictly related to the fisheries must be taken into account when addressing the depletion of the stocks in the Mediterranean such as climate change, pollution (marine debris, plastics, etc.) destruction of key habitats, invasion of alien species, other human impact, etc. and EU policies should be able to complement one to another to achieve the best results, therefore it should be ensured that the Marine Strategy, Water Framework Directive, Birds and Habitats Directive, etc. are well-implemented and effective as well.

- *3. To what extent do you agree or disagree that the current management framework (through national management plans) is sufficient to meet the objectives of the CFP (i.e. sustainable exploitation of marine biological resources) in the Western Mediterranean Sea?
 - Strongly agree
 - Agree
 - Neutral
 - Disagree
 - Strongly disagree
 - Don't know

*Please justify

The diagnostic is clear and showed how the current management framework has not succeeded and proved that something has to be done urgently. In addition, most of the national management plans in the Mediterranean have been adopted before the revised CFP and therefore they are not set on the objective to reach MSY within 2020, among other important aspects.

National plans need to be complemented by regional (sea basin, shared stocks etc), EU MS and Mediterranean (GFCM) level plans. Top down and bottom up, local and global approaches need to be synchronized and made coherent.

*4. To what extent do you agree or disagree that complementing the current manegement
framework with short-term measures such as emergency measures set at national or EU level (e
.g. trawling ban, etc.) would be a sufficient solution to meet the objectives of the CFP?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

*Please justify

Multi Annual Management Plans (MAPs) should provide the main framework steering Mediterranean fisheries towards a sustainable exploitation of marine resources, accompanied by national plans for recovering fish stocks. In the long term, emergency measures should not be a solution. However, emergency measures may be needed now to remedy the situation in the short term while the long process of defining and implementing MAPs does not reach an end and are effectively implemented.

- *5. To what extent do you agree or disagree that amending the current management framework would be a sufficient solution to meet the objectives of the CFP?
 - Strongly agree
 - Agree
 - Neutral
 - Disagree
 - Strongly disagree
 - Don't know

5a. Which amendments to the current management framework do you consider would be most effective? Please select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*Revision of the objectives (e.g. include MSY approach).	0	0	•	0
*Integration of relevant fishing gears not included in the national management plans (e.g. gillnets).	•	•	•	•
*Revision of the material scope of the national management plans.	0	0	•	0
Others	0	0	0	•

Please specify

Amending the current management framework would make a great difference, of course, and therefore we should put all the efforts to amend it correctly and urgently. However we should bear in mind that external factors such as pollution, human impacts, climate change, and, therefore, implementing correctly other related policies also play an important role for the health of a given stock. Such aspects cannot be always addressed in a management plan, but should be taken into consideration and connections to other policies should be enforced and more visible.

In the past, application of management frameworks in the context of the CFP (as in the case of Regulation No 1967/2006) has not worked because both Member States authorities and the fisheries sector have not been adequately implicated in drawing up the measures to be applied. Amending the management framework will not achieve success unless MS and the fisheries sector are fully engaged in the process of drawing up and implementing it.

*6. To what extent do you agree or disagree that the current management framework is full
implemented?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

*Please justify

The Mediterranean Regulation has not been fully implemented in many aspects and equally in different countries. Among other aspects, the lack of involvement of the stakeholders (including the fishing sector) into the design of the measures and the lack of proper and effective control has specially contributed to its ineffectiveness. Also, despite it might be implemented in some areas; the measures set resulted not to be adequate in achieving the present CFP obligations. Therefore, it has not contributed to ensure long-term sustainable management of the fishery stocks.

- *7. To what extent do you agree or disagree that an EU multiannual plan for the fisheries exploiting demersal stocks in the Western Mediterranean Sea, which would take into account the interactions between different types of fisheries, would be the best option?
 - Strongly agree
 - Agree
 - Neutral
 - Disagree
 - Strongly disagree
 - Don't know

*Please justify

An EU Multiannual plan for the fisheries exploiting demersal stocks in the western Mediterranean sea would become a good approach. However, given the multi-specificity of the fisheries, the different Member States involved, different fishing sectors and realities involved in such a wide area, it could be a mistake to leave the fishing management of these areas to only a single EU multiannual Plan. On the contrary, its management framework and decision taking should be able to reach also the local level and be able to devise concrete measures for specific areas and modalities, according to the different realities. The Western Mediterranean MAP should become a general framework that would settle the main objectives and targets, while Member States should design in a co-management scheme (together with a well-represented fishing sector that counts with a dedicated and specific voice of the small-scale, low impact fishing sector) national and local management plans in a coherent way. Also, this EU Multiannual plan should be agreed and coherent at an International level, with the aid of the GFCM, so fisheries management in the whole Mediterranean become coherent and goes in the same direction. Therefore all levels of management are equally important and necessary, not only the EU level (see also point 3).

8. Which objectives do you consider should be introduced in a possible EU multiannual plan? Ple ase select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*To attain sustainable exploitation of the stocks driving demersal fisheries.	•	•	•	•
*To adopt an effective and transparent management framework.	0	0	•	•
*To ensure socio-economic stability of the fishing sector.	0	0	•	•
*To reinforce Control, Monitoring and Surveillance systems.	•	©	•	•
Others.	0	0	0	•

*Please specify

To settle co-management schemes at local, national and international levels, where the fishing sector is well represented and involved in the decision taking processes

Please provide reasons for your answers.

The previous objectives are equally important to allow the MAP to succeed and contribute to the CFP compliance. Taking into account all the pillars of sustainability (environmental, social, and economic) is crucial for the effectiveness of a MAP.

In this regard is also key to settle co-management schemes at local-national and European level, where the fishing sector should be well represented (including a dedicated voice for the small-scale low-impact sector) and involved in the decision taking processes. This would not just improve compliance, and help to recuperate confidence among the stakeholders, but to achieve a more adaptive, reliable and agile management. Of course, at the same time, effective control system (in land and at sea) is obviously crucial in terms of respect of all the measures and it has been shown that is key to achieve the effectiveness of any management. Monitoring is also very important in order to align data collection and assessing with the real status of the stocks.

9. Which of the following elements do you consider should be introduced in a possible EU multiannual plan? Please select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*Scope in terms of stocks, fisheries, area.	0	0	•	0
*Quantifiable targets with timeframe for achieving them.	©	©	•	•
*Safeguards and remedial actions.	0	•	0	0
*Provisions to implement the landing obligation.	©	•	©	•
*Emergency measures.	©	©	•	0
Others	0	0	0	0

Please provide reasons for your answers.

The measures relating to landing obligation should be included in the MAP in order to avoid any overlap and make the regulatory framework more simple and easy to follow.

All the needed actions should be undertaken to avoid any stock to get into emergency situations. However systems are complex and it is not always possible to prevent emergencies. Or differently the measures adopted under the plan might result not effective as expected to recover targeted stocks. In these events, specific measures should be put in place in order to restore the good status of the stock. In this sense the existence of a co-management body would allow also to achieve the adaptive and agile management required.

10. Which species do you consider should be introduced in a possible EU multiannual plan? Plea se select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*Red mullet (<i>M. barbatus</i>)	0	0	•	0
*Deep-water rose shrimp (<i>P. longirostris</i>)	•	•	•	0
*Giant red shrimp (A. foliacea)	•	•	•	0
*Hake (<i>M. merluccius</i>)	0	0	•	0
*Blue whiting (<i>M. poutassou</i>)	0	0	•	0
*Monkfish (<i>Lophius spp.</i>)	0	0	•	0
*Blue and red shrimp (A. antennatus)	•	•	•	•
*Norway lobster (<i>N. norvegicus</i>)	©	0	•	0
*Octopus (<i>O. vulgaris</i>)	0	0	•	0
Others	0	0	•	0

*Please specify

(to be further studied to be determined)

Please provide reasons to support your answers.

Aside from the common hake and octopus, the species targeted mainly concern the practice of trawling rather than to the small coastal polyvalent fisheries, and may differ from one area to another. Even though those could be the main species where the main regulatory effort goes, the Management plans (at least at a local level) should include the entire ecosystem as a whole and include the small-scale target species as well. The management of the fishing ground should be confronted in an ecosystem based management, to avoid the effects that one fishery has to another.

It would be good to anticipate the consequences of changes in management plans for other fisheries to avoid risks of disruption and imbalances (report on other species and issues of sharing fishing grounds).

11. Which technical/conservation measures do you consider should be introduced to manage the species included in a possible EU multiannual plan? Please select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*To establish spatio/temporal closures (e.g. reproduction period/area, etc.).	•	•	•	•
*To establish seasonal or daily catch limits.	0	•	0	0
*To define ceilings for fishing capacity and/or fishing effort.	0	0	0	•
*To address the selectivity of the fishing gear.	0	0	•	0
*To apply sorting grids or similar devices.	0	0	•	0
Others	0	0	0	0

Please provide examples of specific measures relevant for your region.

The protection of spawning and nursery grounds is key for the sustainable exploitation of the stocks.

The multi-specific nature of Mediterranean fisheries, makes it difficult to manage and conserve stocks using catch limits. There would be many choke species to deal with and even complicate more the scenario. Daily limits could be settled in only in specific species where selectivity of its fishing technique is high, such as the sand-eel, the anchovy, blue fin tuna, etc. (normally not demersal species). Also, the management of the TACs/Quota may result in a problem rather a solution, given the fact that it's difficult to settle a fair allocation of quota that takes into account environmental, economic and social criteria and doesn't end into a fight among the different fishing modalities or the marginalization of the most vulnerable. A ceiling to fishing effort is considered a useful tool to recover or maintain stocks biomass above levels which can produce MSY. However, capacity management strategies have not been effective until now in managing stocks sustainably in the Mediterranean and in guaranteeing the sustainability of the fishery. There are strong limitations in identifying capacity limits and such an approach is resulted in reduction in nominal capacity but not in proper fishing mortality reduction, leading to the actual overexploitation rate. Selectivity is a key issue to manage fisheries. In addition to improve gears' selectivity, other measures should be contemplated into MAP, as establishing incentive and granting preferential access to fishing grounds to gears proving a higher selectivity.

In principle sorting grids provide the possibility for selecting target species whilst allowing non-target species to escape. In practice, sorting grids and similar devices may not allow non-target fish to escape undamaged or alive. Much depends on towing speed, the way the trawl is rigged, the positioning of the grid etc.

12. Which technical measures do you consider should be introduced to facilitate the implementation of the landing obligation? Please select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*" De minimis" exemptions.	0	•	•	•
*Measures designed to minimise unwanted catches by modifying the gear structure.	•	•	•	•
*Measures designed to minimise unwanted catches by spatio/temporal closures.	0	•	•	•
*Market incentives.	0	•	0	0
Others	0	0	0	0

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	Others	0	0	0	•			
Plea	Please provide examples of specific measures relevant for your region.							

13. Which mitigation measures do you consider should be introduced to minimise short-term economic and social impacts on the fishing fleet and the coastal communities depending on the demersal fisheries? Please select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*To improve the added value of fish products, including the use of 'ecolabelling'.	0	0	•	0
*To promote the setting of new producer organisations/To support existing producer organisations.	•	•	•	•
*To provide public support under the European Maritime and Fisheries Fund.	0	•	0	0
Others	0	0	0	0

Please provide examples of specific measures relevant for your region.

Talking about ecollabeling: only to apply the Common Market Regulation where it says that the gear of the boat should be specified in the label would be enough, but there is no enforcement and control at all at the moment. Working for a correct implementation of it and guarantee a proper control in land would be totally necessary. In addition to that, however, public labeling that would take into account the ecological aspects together with social ones would be positive for small scale fleets, to make available the possibility to get those labels to small entrepreneurs.

EMFF support should only be used to contribute to the success of the implementation of MAP, to provide income support to fishing crews against loss of earnings as compensation for area and seasonal closures. EMFF should not be used for subsidies that have a perverse effect, like fuel subsidies.

Other measures: Promote social dialogue. Establish co-management committees at the local, national and international levels to involve key stakeholders in the process of decision-making (where a dedicated voice of the small-scale, low impact fishing sector should be guaranteed). In this sense, the restoration of fishing prud'homies management prerogatives in France would ensure a bottom-up approach and the fisheries sector participation in its local management will take place. Diversifying fisheries and adding value to other lesser known species, foment fish processing and small-scale and local entrepreneurship, foment short value chains, promote diversification and reconversion, among other examples.

14. Which other technical/conservation measures not yet applied in the Mediterranean Sea do you consider appropriate in view of ensuring sustainable exploitation? Please select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*To establish fishing opportunities (outputs-quotas).	0	•	•	0
*To increase the mesh size to avoid catches of juvenile fish.	0	0	•	0
*To establish new Minimum Conservation Reference Sizes.	0	0	•	0
Others	0	0	•	0

*Please specify

- Incentivize more sustainable fishing practices through preferential access to less damaging gears and fleets.
- Spatial-temporal management/ closures to avoid catching juveniles, to protect important habitats, to restrict highly discarding and habitat impacting gears

Please provide examples of specific measures relevant for your region.

(On fishing opportunities see answer to question 11: The multi-specific nature of Mediterranean fisheries, makes it difficult to manage and conserve stocks using catch limits. There would be many choke species to deal with and even complicate more the scenario. Daily limits could be settled in only in specific species where selectivity of its fishing technique is high, such as the sand-eel, the anchovy, blue fin tuna, etc. (normally not demersal species). Also, the management of the TACs/Quota may result in a problem rather a solution, given the fact that it's difficult to settle a fair allocation of quota that takes into account environmental, economic and social criteria and doesn't end into a fight among the different fishing modalities or the marginalization of the most vulnerable.)

15. Which impacts on the ecosystem do you consider should be taken into account in a possible EU multiannual plan? Please select the level of importance for each option.

	Not at all Important	Slightly Important	Important	Very Important
*Impact on habitats and benthic communities.	•	•	•	0
*By-catch of unwanted species.	0	0	•	0
*Impact on juvenile individuals.	0	0	•	0
Others	0	0	•	0

*Please specify

Identification of other impacts that may be affecting the stocks and environment as well on such area: pollution focus, other human impacts, effects of climate change detected, etc. and recommendations to take in the framework of other policies

* 16. Are there specific measures (such as minimum mesh sizes, minimum conservation reference sizes, permanent or seasonal closures, etc.) that merit increased flexibility under an EU multiannual plan and that could be introduced at a regional level? What would be the most appropriate legal framework for doing so, the technical measures regulation or the possible EU multiannual plan? Please justify your answer.

Permanent and temporal spatial and seasonal closures, particularly relating to the nursery and spawning areas, can be addressed as fish stock recovery areas. Each Geographical subarea and Country should define the most important areas to be fishery restricted on the basis of a MAP, and the concerned fishing sector (also taking into account a dedicated voice of the small scale and low impact fishing sector) should be involved in that decision making, and engaged in its management, at all levels.

17. Taking into account your responses and inputs, which management framework do you consider better to manage the demersal fisheries in the Western Mediterranean Sea? Please rank the following options according to their level of importance.

	Not at all Important	Slightly Important	Important	Very Important
*National management plans set under the Mediterranean Regulation (with amendments).	•	•	•	•
*An EU multiannual plan.	0	0	0	•
*An international multiannual plan.	0	•	0	•
*Other	•	0	0	0

*Please justify - Only answers justified will be taken into account.

All three levels of management are necessary and equally important (although the system does not allow us to indicate it as such) and LIFE will try to engage in them all, taking into account that they all require the participation and involvement of all the stakeholders, including a well-represented fishing sector (and having into account the dedicated voice of the small-scale, low impact fishing sector). National management plans were implemented before the revision of the CFP (that means without taking in due consideration, for example, the conservation objectives, the MSY approach and 2020 targets, LO, ecosystem approach, etc.). An important change is that the Landing obligation has come into force since these plans were devised. Also, NMPs are not adequate to manage fishing fleets targeting shared stocks or in shared sea basins. However, a national and local management is needed to ensure that the specific reality of each fishery is taken account of, to make a real difference in the fishing management. Therefore amending the National Management Plans is necessary. A MAP addressing conservation issues for priority stocks in the Mediterranean can be facilitated under the regionalization approach with shared stocks of UE Member States. Also EU Multiannual plan can be a good framework to establish the necessary base conditions so that national and local MAPs can be ambitious, effective, coherent and harmonic. Reach a consensus of a coherent MAP at the Mediterranean level, involving EU and non-EU MS, would certainly be an important objective to reach. For this reason, a close coordination and cooperation between the European Commission and the GFCM is highly recommended.

19. Additional information:

questionnaire, you can comment or upload any document(s) here:						

Should you wish to provide additional information or raise enecific points not covered by the

Please upload your file

Contact

MARE-WESTERN-MEDITERRANEAN@ec.europa.eu