



## **LIFE's contribution on the Multiannual Management Plans (MAP) for the demersal fisheries in western EU waters (W-Med MAP)**

The Low Impact Fishers of Europe Platform (LIFE) comments as follows on the Western Mediterranean multi-annual management plan proposal from the European Commission for demersal stocks in the Western Mediterranean Sea:

- Given the shared nature of stocks with third countries outside of the EU – it is important that **regional collaboration through the GFCM** is implemented to ascertain that regional management plans are effective.
- The Western Mediterranean MAP proposal is basically focusing on the trawler fleet. The MAP should include and take into account all the fleets and vessels involved in it, including all the professional segments (both large and small-scale fleets) as well as the recreational fisheries sector:
  - o **Specially, the MAP should provide specific provisions to ensure that Small-scale fisheries are managed under specific small-scale management plans, designed and managed at local level, where its polyvalence should be guaranteed.**
  - o Also it should provide specific provisions to ensure **recreational fisheries is studied and properly managed**, including with effective monitoring, control and surveillance. Therefore statements such as “Council may limit” should be replaced by “Council shall limit”.
- A key factor required for a successful model of management, would be to base the decision making process on **Co-management with participatory processes that can guarantee a bottom-up decision making and improved governance**. The establishment of multi-stakeholder groups **at local level** (co-management committees) would not just allow an adaptive management system, but would entail the involvement and effective participation of the fishery sector and other stakeholders **in the design and management of the necessary measures on the MAPs, including appropriate technical measures and spatial-temporal closures**, which we believe will lead to a shared responsibility on marine resources and, in the end, a greater effectiveness of public policies. Co-management is not only recognized as a necessary mechanism in the recent *MedFishForever* Declaration, but also has been tested locally in various parts of Europe with significant results, and is now being taken on a larger scale by the Catalan government, a model that could guide the application of this scheme at regional level.
- Given that this MAP is going to be approved next year (2019), and given that the deadline to reach sustainability is just one year later (2020), we find this MAP difficult to match its MSY objectives without importantly impacting the fishing sector. Therefore we consider the MAP needs to include **flexibility in its provisions** to mitigate the possible impact of effort management on socioeconomic sustainability. The target fishing mortality in line with the ranges of FMSY should be postponed to 4 years.
- Of particular note is that in some places inspiring bottom-up initiatives are taking place and results are promising. Such initiatives should be rewarded and integrated in the present MAP. The MAP should include **“Conservation Incentive” mechanisms** (for example: provide more fishing days at sea to those that have voluntarily adopted additional measures for the fisheries conservation and the ecosystems through fishery closures, restricting quantity of gear, catches etc.).
- Applying **TAC-Quotas system across all fisheries in the Mediterranean, especially demersal fisheries, will not be appropriate**, given their multi-specific nature. This would not be efficient, and would give rise to significant problems associated with discards. It could also be detrimental to small scale



fisheries, due to the tendency for privatization of a public good and associated accumulation and concentration of quota by a few larger companies. Therefore we propose to eliminate this article.

- A part of the coastal zone should be reserved for small-scale, low impact and selective gears to protect breeding grounds and sensitive habitats, reduce gear conflicts between passive and active gears and to incentivize fishing in a more selective way, with a lower environmental impact. In this sense we believe that current exceptions to the **prohibition of trawling in depths of less than 50m should be reviewed and revised (on a case by case basis)**, including for example, the derogations that allow trawling between the parallel of “Cabo Tortosa” and the “parallel of Almenara”. In addition, LIFE believes the MAP should include provisions to ensure that **Member States review the current rules on trawling within the 50m bathymetric contour**, and where appropriate **extend it out to 100m or an appropriate depth/ distance from shore, either on a temporary/ seasonal or permanent basis**, taking into account environmental, social and economic conditions at the local, national and regional levels"

June 2018