

Dear Members 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).

We agree that the main focus of the West Med MAP should be the regulation of trawling activities. However, LIFE feels that all fleet segments, both commercial and recreational, need to be addressed in this MAP. We have therefore drafted some amendments to incorporate other fleet segments, and to address those issues that will have an impact on the lives and livelihoods of our constituency, the small-scale passive gear coastal fleets. This fleet segment represents around 80% of the fleet by numbers, 60% of the at sea employment, and 24% of the landed value of the fish catch in the Mediterranean.

Our amendments 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 MAP should also provide specific provisions to ensure that recreational fisheries are studied and effectively managed, including with comprehensive data collection and monitoring, control and surveillance systems. These co-management arrangements will need to build in spatial and temporal planning for the shared use of these inshore areas between small scale and recreational fishers.

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.

2. Effort based fisheries management, with input controls

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 not be efficient, and would give rise to significant problems associated with discards. It could also be detrimental to small

scale fishers, due to the tendency for quotas to be privatized through informal and unregulated markets leading to speculation and the accumulation and concentration of quota by a few larger companies.

An integral part of the effort based management system should be the designation of reserved areas for the exclusive use of small-scale, low impact fishing activities, using selective gears. As well as limiting negative impacts on breeding grounds and other sensitive habitats, such zones would also reduce gear conflicts between passive and active gears.

Given the above, we urge that 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 calls for the West Med MAP to include provisions to ensure that Member States review the current rules on trawling within the 50m bathymetric contour, and extend it out to 100m, or 8 miles distance from shore, all year long.

Unfortunately, LIFE will not be present on Monday 24 September when the MAP will be discussed by the Peche Committee. We do, however, 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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EC DRAFT MAP demersal species in WMED	LIFE PROPOSALS OF AMENDMENTS
Article 1. Subject-matter and scope	No observations
Article 2. Definitions	<p>Amendment 1:</p> <p><i>(13, new) “fisheries co-management” is a partnership arrangement between government and the representatives of a defined group of fishers to share the responsibility and authority for the management of activities that impact on fishery resources and the wider aquatic ecosystem in a designated area where they fish (e.g. a protected area, inshore fishing zone etc.), ideally on a parity basis through a co-management committee. The decisions of the co-management committee are advised by scientists in consultation with other stakeholders.</i></p>
<p>Justification</p> <p>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. Co-management of small scale fisheries forms an integral part of the MedFish4Ever Ministerial Declaration, signed in Malta in 2017. The draft Mediterranean Declaration on a Regional Plan of Action for Small-scale Fisheries in the Mediterranean and Black Sea highlights that the insufficient involvement of small scale fishers in relevant decision making processes is a constraint to effective governance.</p>	
Article 3. Objectives	No observations
<p>Article 4. Targets</p> <p><i>1. The target fishing mortality in line with the ranges of FMSY defined in Article 2 shall be achieved as soon as possible, and on a progressive, incremental basis by 2020 for the stocks concerned, and shall be maintained thereafter</i></p>	<p>Amendment 2:</p> <p><i>1. The target fishing mortality in line with the ranges of FMSY defined in Article 2 shall be achieved as soon as possible, and on a progressive, incremental basis 3 years after the entry into force of the Multiannual</i></p>



<i>within the ranges of FMSY.</i>	<i>Management Plan for the stocks concerned, and shall be maintained thereafter within the ranges of FMSY.</i>
<p>Justification:</p> <p>It is unlikely that the West Med MAP will be approved before next year (2019). It will therefore be difficult for the West Med MAP to achieve the CFP requirement for the exploitation of all fish stocks to be within FMSY by 2020, without a major social and economic impact on the fishing sector. Some flexibility therefore needs to be built into the MAP to minimize the social and economic impacts during the transition to MSY.</p>	
Article 5. Conservation reference points	No observations
Article 6. Safeguards	No observations
<p>Article 7. Fishing effort regime</p> <p>5. Where the scientific advice shows <i>significant catches</i> of a particular stock with fishing gears other than trawls, fishing effort levels shall be set for such particular gear or gears on the basis of such scientific advice.</p>	<p>Amendment 3:</p> <p>5. Where the scientific advice shows catches <i>higher than 10% of the total landings</i> of a particular stock with fishing gears other than trawls, <i>Member States shall endeavor to include these fishery activities in specific management plans designed through a co-management process to ensure that the fishing effort levels shall be set for such particular gear or gears on the basis of scientific advice, while ensuring polyvalence of the small scale fishing fleets.</i></p>
<p>Justification</p> <p>More concrete targets and indicators are needed ensure that fishing effort is brought within FMSY target levels, and that the management of small-scale coastal fisheries (SSCF) is devolved to the local level, under specific management plans, under a co-management regime, guaranteeing the polyvalence of SSCF</p>	



<p>6. Where the scientific advice shows that recreational fisheries have a significant impact on the fishing mortality of a particular stock, the Council may limit recreational fisheries when setting fishing opportunities in order to avoid exceeding the total target of fishing mortality.</p>	<p>Amendment 4:</p> <p>6.1. Where the scientific advice shows that recreational fisheries have a significant impact on the fishing mortality of a particular stock, <i>Member States shall, where appropriate, include these activities into specific management plans, including with effective data collection, and monitoring, control and surveillance, designed through a co-management process</i> in order to avoid exceeding the total target of fishing mortality.</p>
<p>Justification</p> <p>No data collection systems for recreational fishery are in place, therefore there is a risk that this provision will be ineffective. The MAP should include provisions to ensure recreational fisheries are studied and properly managed, including with effective data collection and monitoring, control and surveillance. In addition, the degree of demand of the Regulation to the recreational fisheries should be the same that in commercial fisheries, due to the relevance of recreational fisheries in the area.</p>	
<p><i>Article 8. Total allowable catches</i></p> <p><i>“Where the best available scientific advice shows that the fishing effort regime is not sufficient to meet the objectives or targets set out in Articles 3 and 4, the Council shall adopt complementary management measures based on total allowable catches”.</i></p>	<p>Amendment 5:</p> <p><i>Article 8 to be deleted</i></p>
<p>Justification</p> <p>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 quotas through informal and unregulated markets with associated accumulation and concentration of quota by a few larger companies. Therefore, we ask for this article to be removed.</p>	



Article 9. Obligations of the Member States

1. Member States shall manage the maximum allowable fishing effort in accordance with the conditions laid down in Articles 26 to 34 of Regulation (EC) No 1224/2009.

2. Each Member State shall decide on a method for allocating the maximum allowable fishing effort to individual vessels or groups of vessels flying its flag, in accordance with the criteria in Article 17 of Regulation (EU) No 1380/2013. In particular, Member States shall:

(a) use transparent and objective criteria, including those of an environmental, social and economic nature;

(b) distribute national quotas fairly among fleet segments, giving consideration to traditional and artisanal fisheries; and

(c) provide Union vessels with incentives to deploy selective fishing gear or use fishing techniques with reduced environmental impact.

3. Where a Member State allows vessels flying its flag to fish with trawls, it shall ensure that such fishing is limited to a maximum of 12 hours per fishing day, five fishing days per week or equivalent.

4. For the vessels flying its flag, each Member State shall issue fishing authorisations for the areas referred to in Annex I and in accordance with Article 7 of Regulation (EC) No 1224/2009.

5. Member States shall ensure that the total capacity, expressed in GT and kW, corresponding to the fishing authorisations issued in accordance with paragraph 4 is not increased during the period of application of the plan.

Amendment 6

8. (new) Member States shall, where appropriate, establish specific management plans

a) for small-scale coastal fishing fleets at local level guaranteeing its polyvalence, and

b) for recreational fisheries with effective systems for data collection and for monitoring, control and surveillance.

9. (new) Member States shall, where appropriate, establish co-management regimes to ensure the optimal adaptation of these management plans to the local fishing realities, and for local and experiential fishers' knowledge to be taken into account.

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<p>6. Each Member State shall establish and maintain a list of vessels issued with fishing authorisations pursuant to paragraph 4 and make it available to the Commission and other Member States. Member States shall transmit their list for the first time within three months after the entry into force of this Regulation and subsequently no later than 30 November each year.</p> <p>7. Member States shall monitor their fishing effort regime and ensure that the maximum allowable fishing effort referred to in Article 7 does not exceed the set limits.</p>	
<p>Need for adequate provisions to assure that small scale fisheries and recreational fisheries are properly managed and to ensure the optimal adaptation of the plan to the local fishing realities.</p>	
<p>Article 10. Communication of relevant data</p>	<p>No observations</p>
<p>Article 11. Closure areas</p> <p>1. <i>In addition to what is provided for by Article 13 of Council Regulation (EC) No 1967/2006, the use of trawls in the western Mediterranean Sea shall be prohibited within the 100 m isobath from 1 May to 31 July each year.</i></p>	<p>Amendment 7:</p> <p>1. <i>In addition to what is provided for by Article 13 of Council Regulation (EC) No 1967/2006, the use of trawls in the western Mediterranean Sea shall be prohibited within the 100 m isobath or 8 miles from the shore.</i></p> <p>2. <i>(new) By way of derogation from paragraph 1, other types of temporal and spatial restrictions of an equivalent effect on fish stocks may be implemented as an alternative when justified on the basis of sea bottom topography and in line with EU social policy.</i></p>
<p>Justification</p> <p>The reservation of a part of the inshore zone for small-scale coastal fisheries using low impact and selective gears will help to ensure their fair access to fishing</p>	

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<p>grounds, protect breeding grounds and sensitive habitats, reduce gear conflicts between passive and active gears and incentivize fishing in a more selective way, with a lower environmental impact.</p>	
<p>Article 12. Management of by-catch stocks and demersal stocks for which sufficient data are not available</p>	<p>No observations</p>
<p>Article 13. Other technical conservation measures</p>	<p>No observations</p>
<p>Article 14. Provisions linked to the landing obligation</p>	<p>No observations</p>
<p>Article 15. Regional cooperation</p>	<p>Amendment 8:</p> <p><i>(3 new) Member States shall, given the shared nature of stocks and where appropriate, establish regional collaboration with third countries outside of the EU under the auspices of the GFCM to ensure that regional management plans are effective.</i></p>
<p>Justification</p> <p>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 ensure that regional management plans are effective.</p>	
<p>Article 16. Amendments of the Plan</p>	<p>No observations</p>
<p>Article 17. Monitoring and evaluation of the plan</p>	<p>No observations</p>
<p>Article 18. Exercise of delegation</p>	<p>No observations</p>
<p>Article 19. Support from the European Maritime and Fisheries Fund</p>	<p>No observations</p>

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