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In relation to the landing obligation, as envisaged in art. 15 of the proposals on the reform of the CFP which are being addressed in the trilogue, RAC MED\*:

- Confirms the position it expressed in its Opinion dated 28<sup>th</sup> October 2011, in particular with regard to the difficulties of implementation in the Mediterranean basin (ref. n. 266/AV)<sup>1</sup>;
- Re-iterates that, in order to achieve the shared goal of a significant reduction in discards, it is first and foremost essential to avoid unwanted catches by adopting suitable technical management measures and by achieving greater gear selectivity.

RAC MED is of the opinion that protecting juveniles and minimising discards are goals to be pursued within fishery-level management plans.

Such management plans must contain specific technical measures, including time/area closures and gear selectivity improvement and establish a timetable for implementation.

RAC MED considers that measures to protect juveniles are already specified in detail in Mediterranean Regulation 1967/2006, and that such measures afford adequate protection for juveniles. It also believes that the landing of undersized fish:

- would involve a serious risk of the CFP reverting to a less effective status;
- would be contradictory and set a bad example for fishers and consumers;
- would be a danger for the conservation of fish resources and potentially damaging for the environment and the trophic chain;
- would involve enormous technical and financial difficulties to implement and entail potential negative effects on employment.

Therefore, in order to guarantee the full recovery of Mediterranean stocks and a healthy future for fisheries, RACMED suggests that the Mediterranean be exempted from the landing obligation, leaving it to multi-annual management plans to prepare suitable gear selectivity measures and that all necessary measures be intensified to ensure the full respect of existing regulations.

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\*This letter was endorsed by all members of the Executive Committee<sup>2</sup> with the exception of Oceana and EAA (together with IFSUA substitute of the seat assigned to EAA). Oceana is fully supportive of a discard ban in the Mediterranean and expresses its willingness to co-operate and work towards its appropriate implementation in the Mediterranean Sea. EAA is generally supportive towards a discard ban for all EU

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<sup>1</sup> Opinion attached

<sup>2</sup> Table attached on the composition of the Executive Committee of the RAC MED



waters, including the Mediterranean Sea. They do agree to 'discards' (or releases) of fish with a high probability of survival. They do know and accept, that derogations have to be negotiated for some fisheries, at least for the short term. They cannot support a statement that all Mediterranean fishermen should be exempted from the landing obligation at this point in time. Exemptions should be negotiated case by case.

Giampaolo Buonfiglio  
President



Copies: Ernesto Bianchi, Fabrizio Donatella, Olivier Baudelet, Evangelia Georgitsi.

