



Ref.:187/CE

Rome, 17 July 2012

To Lowri Evans
Director General for Maritime
Affairs and Fisheries
1049- Bruxelles

Copy to Ernesto Bianchi
Head of Unit
Unit A2- DG MARE

Dear Ms. Evans,

A RAC MED observer was present at the meeting of the *EWG-STEFC* (11-20) on the assessment of Mediterranean fishery stocks, held in Madrid from 16th to 20th January 2012, and he gained knowledge on the working methods used by the researchers in formulating the opinions and indications that are taken into consideration by the EC in the decision making process.

RAC MED believes it is important for all stakeholders to be aware of these mechanisms and thus invited *EWG-STEFC* researchers to the Working Group meeting (WG3), which focuses on monitoring and analysing of GFCM related issues. The experts presented several case analyses and assessments of specific stocks, illustrating the procedures, models used, procedural and technical timing issues and the indications given to the EC with the scientific basis for each one.

These presentations highlighted among other things the worrying state of some stocks and the need to move towards a reduction in fishing mortality for these species. As a result of the presentations some issues were chosen and debated which we feel are useful to transmit to the Executive Committee, not as a proposed Opinion but as informative elements to be reflected on. This letter has been approved by written procedure by the Executive Committee members on July 16. The global debate brought to light the urgent need to increase cooperation between scientist and all stakeholders with decision makers in order to improve knowledge on the various matters. In the course of the WG3 discussion the following aspects emerged:

- 1) The RAC MED revealed that there is a significant time lag between the period in which data are gathered and analysed, the elaboration of the stock assessments and therefore the recommended management proposals by researchers (STEFC). This time lag is then followed by the time lapse needed by the EC to formulate fishing opportunities for those member States in which the TACs and quotas system is working and technical and management measures' proposal in those the previous system cannot be applied, as it is the case in the Mediterranean. The recommended data provided by the STEFC will obviously be taken into consideration in the evaluation of the management plan. Regardless of the technical difficulties that cause this lag, it is clear that there can be a time lapse of 2 – 2.5 years between the



situations described by the data provided by the MS and the EC proposals. This is a significant time lapse during which events that modify the situation of the stocks and its fishing mortality could occur.

For example it is clear that the assessments carried out in 2011 are produced on the basis of data provided by the MS for 2010, and that the forecasts and then the proposals that could derive from these data will be produced in the second half of 2012, about two years after the moment that was initially observed and assessed, and will be used to advise fishing opportunities for 2013. This can cause potentially significant differences between the day to day situation observed by fishery operators at sea relative to the abundance (or lack) of certain stocks, and the circumstances described in the scientific reviews that are based on official data on landed products from the MS.

- 2) If the above considerations are not only applied to the definition of fishing opportunities, for the TAC and quotas area and for eventual proposal concerning technical or management measures for the Mediterranean for a given year, but also to the formulation of legislative proposals, the resulting picture would cause great concern. The impact of the change in codend mesh size in trawl nets that came into force on 31st May 2010 (but only fully noticeable in 2011) will inevitably only be analysed in 2012 and as a consequence evaluated in terms of legislative proposals in 2013 (which in turn would be applicable in 2014). The same delay could also be observed concerning the effects of further fleet reductions brought about by the continuing European Fisheries Fund subsidies for decommissioning fishing vessels. In other words, given the time lapses described herein, it would appear that some proposed legislation that is still under discussion has been formulated without waiting for an insight into the impact of the policies and measures that are already in force.
- 3) A further issue under discussion referred to the indications and recommendations which result from research, and the relative time span. It was clear from the presentations made by the independent researchers at the Working Group meeting that the assessments provided to the EC, among others, include the reduction of F necessary to achieve MSY, and the different scenarios that result from mesh size enforcement, reduction of the fishing activity, and consequences on the biological indicators of the different time periods (to 2015 and to 2020) in which this reduction is carried out. Results from research, however, do not provide indication of the different levels of impact on the sector that will cause the different type of reductions (fleet reduction and/or days at sea) and, in addition, the different impacts on the sector of achieving the management objective in 2015 or in 2020. These socio-economic evaluations would require further studies and evaluations. The task of the management option falls exclusively to the decision makers, and therefore to the EC in the formulation of the management proposals.

The RAC MED therefore expressed serious concern regarding the decision making process which, in spite of the modifications brought about by the Lisbon Treaty, is still based on mechanisms established to set up fishing opportunities based on the advised fishing mortality.

The RAC MED believes that it would be beneficial to:

- accelerate, where possible, the time required to analyse, assess and create proposals where data from the MS are concerned, for the definition of fishery opportunities;
- strengthen collaboration between fishers and researchers, as already emphasized in the CFP reform, by means of meetings to share points of view planned in the context of the RACs for STECF and the stakeholders;
- take fully into account scientific recommendations and incorporate them without delay within the context of comprehensive management plans for a specific fishery (rather than setting overall measures for the whole region)



- gain thorough knowledge of the impact on fishery stocks of the measures contemplated in the regulations in force;
- carry out specific studies able to define the various effects produced by managerial choices in order to achieve the scientifically recommended fishing mortality as well as the impact on fleets and employment.

We hope that this note has provided useful elements for reflection and discussion.

Yours sincerely,

Mourad Kahoul
Président

