

Ref.:178/2017

Rome, 12 June 2017

To the STECF  
Chair Clara Ulrich  
[jrc-stecf-secretariat@ec.europa.eu](mailto:jrc-stecf-secretariat@ec.europa.eu)

To the GFCM/SAC  
Chair Othman Jarboui  
[alicemal.gucu@gfcmonline.org](mailto:alicemal.gucu@gfcmonline.org)

To ADRIAMED  
Project coordinator Enrico Arneri  
[enrico.arneri@fao.org](mailto:enrico.arneri@fao.org)

Institute of Oceanography and  
Fisheries  
Director General Nedo Vrgoc  
[vrgoc@izor.hr](mailto:vrgoc@izor.hr)

CNR-DTA  
Director General Fabio Trincardi  
[direttore.dta@cnr.it](mailto:direttore.dta@cnr.it)

Fisheries Research Institute of  
Slovenia  
Director General Dejan Pehar  
[dejan.pehar@zzrs.si](mailto:dejan.pehar@zzrs.si)

As you all know MEDAC, representing the stakeholders of 8 Mediterranean Member States, can - among its institutional tasks - draft opinions on the CFP topics, including the multiannual management plans provided for by the Basic Regulation (no.1380/2013).

In this framework, the stock assessment carried out by the STECF and the GFCM/SAC, by means of the data collection provided by the Member States and the analysis by the adopted models, is of primary importance. These assessments are the scientific basis leading to Recommendations and Regulations.

Although expressing opinions on this assessment and/or the models being used does not fall within the scope of the competences of MEDAC, on several occasions during the stakeholder debates, concerns were expressed about the difference between the diagnosis made by the Scientific Committees and the perception of the fisheries at sea. This discrepancy is usually due to the time that the scientific assessments take - on average 2 years - since the scenarios might have changed in the meantime.

The difference between the assessed stocks and the perception of the status of the fisheries by several stakeholders can be significant, thus affecting the discussion on management measures when it comes to short life cycles high fecundity and fast growing species, with natural annual fluctuations and heavily dependent on environmental factors.

This is the case of the small pelagic stocks in the Adriatic sea and the EC proposal for a Regulation on a multi-annual management plan currently being launched under co-decision through the trilogue.

In this framework, stakeholders have doubts about certain ecological factors that maybe were not taken into account in the scientific assessments, such as, for example, the influence that the trends of primary production have on these species and the relationships with the predators (BFT).

Some stakeholders raised doubts about the exhaustiveness of the data used in the stock assessments, which are mainly based on the overall annual catch rather than CPUE or echosurvey. This might lead to an unfavourable management proposal of the reduction in the fishing effort.

Hence our request to provide clarification on the above-mentioned issues and doubts, to better fulfill our tasks, and to involve research/scientific institutions in the organization of *ad hoc* meetings / workshops in the venues and times to be agreed upon.

Best regards,

Giampaolo Buonfiglio  
President

