

**MEDAC CONTRIBUTION TO THE
ANNEX 2: VADEMECUM ON ARTICLE 17 (ALLOCATION OF FISHING OPPORTUNITIES)**

Based on the issues outlined in the letter, we would like your feedback on the following aspects.

MEDAC preamble "Considering that in the Mediterranean Sea Fishing opportunities also concern quotas of fishing effort, and only to a limited extent maximum annual catch for shrimps and TAC & Quota for blue fin tuna, we agree on the need of clarification of the term Fishing opportunities (FOs), that should include the fishing effort quotas. Moreover, in the Mediterranean Sea special attention should be paid to the SSF because it is a fragile sector, and its social component is more important than the economic one. It is also advisable to be able to define FOs according to the sea basins and sub-basins, which have their own specificities."

Questions on the vademecum

1. Regarding the suggested draft content of the vademecum presented in part 2.2:

a. Do you agree with the elements to be included?

Yes, but we propose to add an «F» point:

F. Existing practices to allocate fishing opportunities based on economic and compliance criteria

b. Do you have additional suggestions regarding the content?

No, however we would like to highlight that the handbook must not replace the regulation, but only has the task of helping to apply it in the most correct way.

c. Do you have comments about any of the specific sections (A, B, C, D or E)?

No, we remark that the handbook should be a «service» tool, therefore it should be easy to read (for MS and operators) and absolutely should not take a position towards one or another practice of allocating fishing opportunities.

2. Section 4.5 of STECF EWG Report 23-17 identifies some novel ways to allocate fishing opportunities.

a. What do you think about the unique practices identified?

Each MS is free to choose, within the limits of the provisions of articles 16 and 17 of the CFP, which practices to use for the allocation of fishing opportunities. The EWG 23/17 study is very interesting for the ideas it provides.

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b. Could they be used more widely in the future?

Yes, we think so.

c. How/at what point could they be introduced?

The question is quite complex: each MS will decide how and at what point they could be introduced. The topic is interesting and will be discussed further in MEDAC meetings.

3. Do you have any comments about using the publication of National Fisheries Profiles, as a means to improve transparency on the use of article 17 by Member States (see point 2.1)?

No, probably we need to see how the National Fishery Profile is structured. However, it should not become a tool for ranking the different SM.

Do you think transparency could be achieved by other means?

Probably yes.

4. Would you like to participate in a workshop where some of these different practices are described in more detail?

Yes, certainly.