

MEDAC contribution

Targeted consultation on the 2022 Report on the Functioning of the Common Fisheries Policy

Q1. What are the specific fisheries conservation and management measures introduced by the CFP Regulation that work well and contributed to real change and/or progress in terms of sustainable EU fisheries?

- temporary closures **ZZRS (Slovenia 60%) – Federpesca (Italy 60%) – CEPESCA (SPAIN 60%) - FNCP (SPAIN 60%)**
- mesh size regulation **ZZRS (Slovenia 60%) - FNCP (SPAIN 60%)**
- multiannual management based on ecosystems **Federpesca (Italy 60%)**
- limited access in the 12 nm area **Federpesca (Italy 60%) - FNCP (SPAIN 60%)**
- catch limits **Federpesca (Italy 60%)**
- ban of destructive gears or metièrs **Federpesca (Italy 60%)**
- Implementation of regionalisation (art.18 CFP Regulation) **AGCI Agrital – Federcoopescas - Legacoop (Italy 60%)**
- Implementation of art. 5, especially about EEZ institution by the MS. **AGCI Agrital – Federcoopescas - Legacoop (Italy 60%)**
- Marine protected areas **FNCP (SPAIN 60%)**

- The question is not correct because CFP is not working well: conservation and management measures are only based on a fast reduction of fishing effort without taking into account the socioeconomic impact on fishery sector. **EMPA (SPAIN 60%) - UNACOMAR (SPAIN 60%)**
- The socioeconomic impact should be taken into account when management measures are proposed. **CEPESCA (SPAIN 60%)**
- All the letters foreseen by the art. 7, par.1 of CFP Regulation, excepted the letter f) on landing obligation, a correct and flexible application could allow to reach a real change. **Coldiretti (Italy 60%)**

- In the last 20 years the CFP has reached successful results considering the increasing number of stocks exploited at the MSY level. The Communication of the Commission to the European Parliament and to the Council on the Fishing opportunities in 2022 stated that the stock biomass in the Mediterranean and in Black Sea showed a positive trend since 2015. It means that instead to introduce new management measures, it is necessary to evaluate the effectiveness of the previous ones. **CNPMEM French fishery sector.**

Disclaimer - This advice reflects only the MEDAC's view and the Commission is not responsible for any use that may be made of the information that it contains

- The future management measures should include the financial support to go forward to the ecological transition of the fishing fleet, generational turnover, equal opportunities and energy efficiency; more reliable scientific data should underpin the restrictions to fishing activities; Co-management should be encouraged. **CEPESCA (SPAIN 60%)**.

- The results of the CFP show a sad result, namely that EC fishing activity continues to be inexorably reduced, in so far as we place our consumers in the hands of third parties. The same applies to marine resources, which are exploited by fleets that are not subject to the complex and sometimes contradictory EC acquis. **UNACOMAR (SPAIN 60%)**.

- Science-based steps to safeguard the sustainability of stocks and fisheries for the long term in European waters have produced multiple benefits and contributed to the increasing general profitability of the EU fleets. Where overfishing has been brought under control, stocks have recovered quickly. The CFP has indeed led to an overall reduction in fishing pressure since the policy was reformed in 2013. Although many catch limits continue to be set in excess of scientific advice, on average the limits have been brought closer to the levels that scientists recommend. **WWF (40%)** Still, this progress has been too slow, and the objectives and deadlines set by the Policy have not been achieved. Reviewing and addressing current and past shortcomings in implementation must therefore be a critical priority now and before any future revision of the policy is even considered. For instance, much work remains to be done by the Commission and the Member States to fully restore and maintain all populations of harvested species above levels which can produce the maximum sustainable yield. **WWF (40%)**

The ecosystem-based approach has for instance been taken into account for some stocks in the Fisheries Council's (AGRIFISH) decisions on Baltic fishing opportunities for the year 2022, where certain TACs levels were set below the maximum threshold advised by the scientists. This approach must be generalised, as we must look at fish stocks and their interactions with other species and habitats, as well as their vulnerability to the adverse impacts of climate change. MSY must be a limit, not a goal, while keeping stocks at biomass levels above 50% of carrying capacity, and maintaining their spawning stock biomass ('SSB') levels at a minimum of 40%. **WWF (40%)**

The IUU, SMEFF and Control regulations, part of the CFP framework, have also played an important role in driving fisheries reforms, promoting more transparent and sustainable fisheries both domestically and internationally. The IUU and SMEFF regulations would nonetheless benefit from better implementation, while the EU must ensure an ambitious new Control regulation. **WWF (40%)**

Q2 - 1. The CFP shall ensure that fishing and aquaculture activities are environmentally sustainable in the long-term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits Do you believe that the objective has been achieved? (1= not at all; 2= Partly; 3= Fully)

- **Answer: Partly** Ref.:115/2021 - **Maximum Sustainable Yield (MSY) in Mediterranean fisheries management. Some food for thoughts** *"The scientific experts underlined that the above mentioned issues related to MSY should be contextualised in the wider framework of the ecosystem approach to fisheries management, taking into due consideration the ecological, economic, social and institutional*

dimensions. The MEDAC acknowledges the fact that the fisheries sector needs to be steered towards the criteria which would ensure achievement of full sustainability, without delay. An ecosystem-based approach shall allow managers to take into account multiple factors, including those independent from fisheries, and provide tools to mitigate the impact that management measures adopted for target species have on other stocks, especially when considering mixed fisheries." [LINK](#)

Q2 - 2 The CFP shall apply the precautionary approach to fisheries management, and [...] exploitation above levels which can produce the maximum sustainable yield. [...] MSY shall be achieved by 2015 where possible and at the latest by 2020 for all stocks. Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

- Answer: Partly Ref. 200/2020 MEDAC OPINION Towards more sustainable fishing in the EU: state of play and orientations for 2021 "The available stock assessments carried out by STECF and GFCM highlight an exploitation status at rates on average well above the sustainability objective of the Common Fisheries Policy." [LINK](#)

Q2 - 3. The CFP shall implement the ecosystem-based approach to fisheries management so as to ensure that negative impacts of fishing activities on the marine ecosystem are minimised, and shall [...] avoid the degradation of the marine environment. Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

- Answer: Not at all

Ref.70/2021 - MEDAC ADVICE ON CLIMATE CHANGE "[...] Therefore, it is necessary to: Promote greater consideration of adaptation to climate change in the guidelines and integrated community policies (in particular the Common Fisheries Policy) [...] Recommended Precautionary targets and an ecosystem-based approach. The increasing risks that climate change determine, can be mitigated with an ecosystem-based approach to fisheries management that supports a broader ecosystem resilience. Selectivity is, for example, a tool to reduce unwanted catches." [LINK](#)

Ref 236/2020 GFCM Strategy 2021-2025-Integration of the previous MEDAC contribution (ref.217/2020) "The Working Group 1 highlighted that the forthcoming Multiannual Plans should take into consideration the following environmental variables as additional factors, other than fishing mortality, influencing the stocks patterns in an ecological perspective:

✓ climate change and its consequences on salinity, nutrients, waters stratification, plankton availability, recruitment success etc.

✓ plastics impact on the food web and on the growth of the assessed stocks

✓ alien species and their competition with the assessed stock" [LINK](#)

Ref 115/2021 MEDAC discussion paper on MSY "It was also observed that the stock assessments and the associated management decisions in the Mediterranean were based on monospecific maximum sustainable yield estimation (Hjort, Russell, Graham, 1930 et seq.), not considering trophic interactions among species, between different types of fishing gear and with the surrounding environment over time (Ricker, 1954 and 1975; TraversTrolet et al., 2020)." [LINK](#)

Q2 - 4. The CFP shall contribute to the collection of scientific data. Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

- Answer: Not at all

Ref 142/2021 MEDAC advice on MSY, fishing opportunities and GFCM decisions *"Furthermore, considering that the effects of management measures taken in 2019 and 2020 will possibly be evident only in next year's data (as monitoring indicators currently available cover the period to 2018), whatever the approach in managing mixed fisheries is adopted, managers should deeply also evaluate the socio-economic implications of future management actions."* [LINK](#)

Ref 204/2020 MEDAC opinion on the MAP for Small Pelagic resources in the Adriatic *"The MEDAC upholds the view that: first and foremost, the future MAP for small pelagic resources in GSAs 17 and 18 must be based on a socioeconomic assessment that is up-to-date, robust and corroborated by the best scientific advice available, this analysis should be capable of highlighting the impact of the MAP year after year, not only on the resources but also on the economic sustainability of fisheries enterprises and on safeguarding jobs at adequate levels of remuneration."* [LINK](#)

Ref 200/2020 MEDAC opinion Towards more sustainable fishing in the EU: state of play and orientations for 2021 *"According to the Communication report, the instability of dataset used in estimating F/Fmsy trends and the reduced availability of data may have an impact on the reliability of the state of play of the assessed species. Moreover, fisheries resources and the marine ecosystem suffer additional impact other than fishing activity¹, such as from pollution, commercial traffic, climate change, marine litter, population pressure and anthropization."* [LINK](#)

Q2 - 5. The CFP shall gradually eliminate discards taking into account the best available scientific advice, by avoiding and reducing, as far as possible, unwanted catches, and by gradually ensuring that catches are landed Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

- Answer: Partly

Ref 50/2021 MEDAC CONTRIBUTION QUESTIONNAIRE ON TECHNICAL MEASURES (ART 31.1. of EU REGULATION 2019/1241) [LINK](#)

Q2 - 5. The CFP shall make the best use of unwanted catches, without creating a market for such of those catches that are below the minimum conservation reference size Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

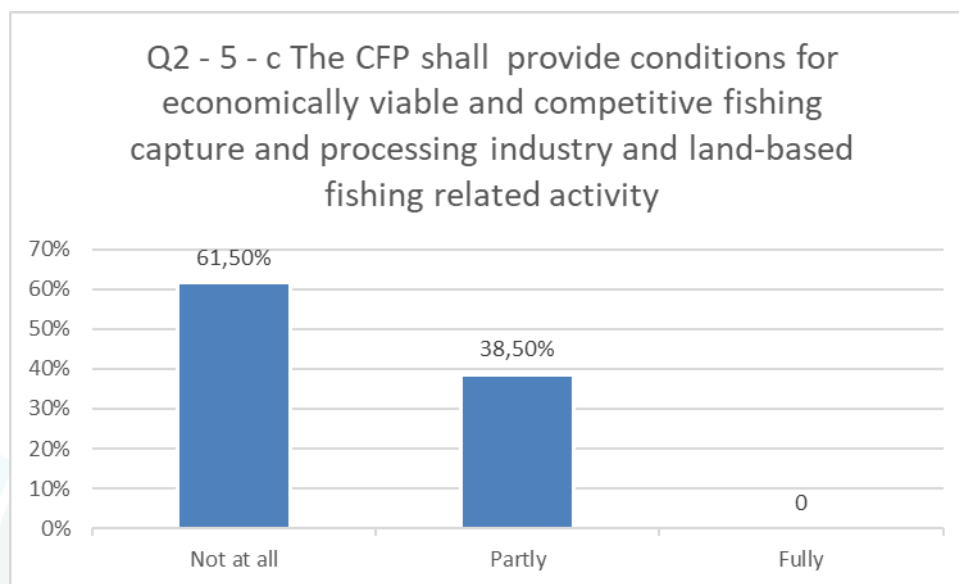
- Answer: Not at all

Ref 21/2020 Annual report on the implementation in 2019 of the Landing Obligation- Your letter ref. Ares (2019)7821069 - 19/12/2019 *"Moreover, please find attached the letter sent by MEDAC on 24 October 2018 (Ref. 262/2018) to the MS and to the General Director of DG MARE on the entry into force of the landing obligation for all species, where the reasons of the Mediterranean constraints and difficulties related to the LO implementation has been provided. Furthermore, as confirmed by Consideranda 16 of the Commission Delegated Regulation (EU) 2020/4, STECF concluded that ""due to the small quantities and the very large number of landing places [...], the evidence indicated that*

1 1 Birdlife, Legambiente, MedReact, WWF (40%) do not agree with "other than fishing activity"

the collection costs would be disproportionate"" then ""in light of the above, it is appropriate to apply the de minimis exemptions [...] until 31 December 2021". [LINK](#)

Q2 - 5. The CFP shall provide conditions for economically viable and competitive fishing capture and processing industry and land-based fishing related activity Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)



Q2 - 5. The CFP shall provide for measures to adjust the fishing capacity of the fleets to levels of fishing opportunities consistent with paragraph 2, with a view to having economically viable fleets without overexploiting marine biological resources. Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

- Answer: Not at all

Ref. 200/2020 MEDAC OPINION Towards more sustainable fishing in the EU: state of play and orientations for 2021 *"The available stock assessments carried out by STECF and GFCM highlight an exploitation status at rates on average well above the sustainability objective of the Common Fisheries Policy. Therefore, EC asks for other vigorous conservation efforts in the Mediterranean Sea, notably with the implementation of the Western Mediterranean MAP for demersal fisheries and many actions taken to deliver on the MedFish4Ever and Sofia Declarations, such as the GFCM Adriatic multiannual plan for demersal fisheries adopted in 2019; On the other hand, number of vessels, GT and KW in the EU fleet continue to decrease, and so the total employment in the EU fleet in full time equivalents (FTE) has been decreasing on average by 1.2% per year since 2008; The economic performance of the EU fleet continued to be very good, but not for the Mediterranean and Black Sea, where profitability levels are lower than in other sea basins;" [LINK](#)*

Rating (1-3) Q2 - 5. The CFP shall promote the development of sustainable Union aquaculture activities to contribute to food supplies and security and employment Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

Q2 - 5. The CFP shall contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

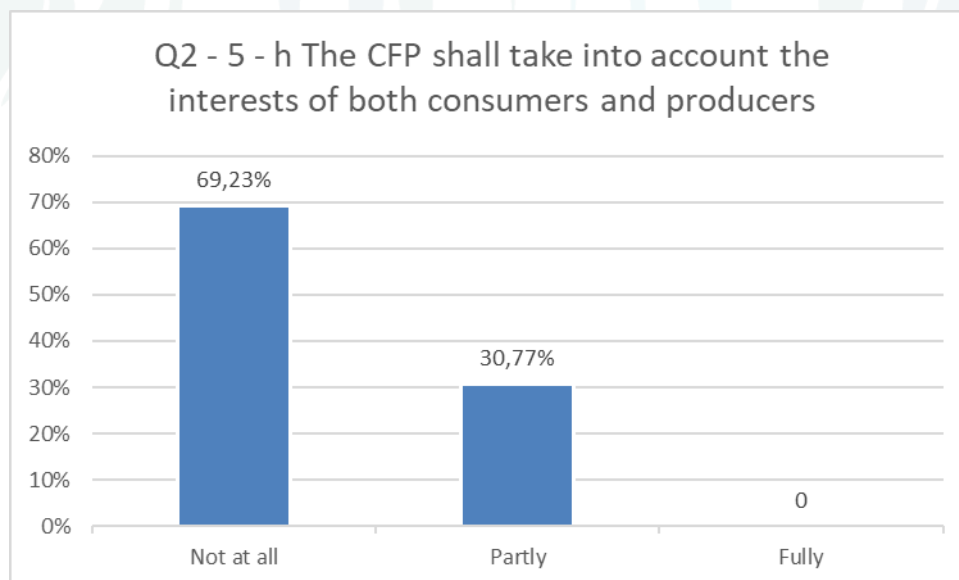
- Answer: Not at all

Ref 200/2020 MEDAC opinion Towards more sustainable fishing in the EU: state of play and orientations for 2021 - "According to the Communication report, the instability of dataset used in estimating F/F_{msy} trends and the reduced availability of data may have an impact on the reliability of the state of play of the assessed species". [LINK](#)

Ref 204/2020 MEDAC opinion on the MAP for Small Pelagic resources in the Adriatic "The sector has repeatedly emphasised the difficulty in preparing an opinion in the absence of up-to-date scientific data on the state of the resources affected by the imminent MAP, especially following the application of emergency measures which have already led to a reduction in fishing effort relative to the two species in question, with the associated socio-economic impact on the sector." [LINK](#)

Ref. 203/2020 MEDAC CONTRIBUTION ON THE IMPLEMENTATION OF THE MAP OF DEMERSAL SPECIES IN THE WEST MED "Moreover, the FG highlighted the relevance of the following aspects to be taken into consideration in the MAP evaluation and in the forthcoming decisions about the fishing effort quotas in 2021: - the timing of the MAP implementation is very tight, then the scientific experts will be not able to assess the effect of the MAP's application - the socio-economic impact of the measures should be assessed." [LINK](#)

Q2 - 5. The CFP shall take into account the interests of both consumers and producers Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)



Q2 - 5. The CFP shall promote coastal fishing activities, taking into account socio-economic aspects (1= not at all; 2= Partly; 3= Fully)

- **Answer: Partly**

Ref 204/2020 MEDAC opinion on the MAP for Small Pelagic resources in the Adriatic *"The sector has repeatedly emphasised the difficulty in preparing an opinion in the absence of upto-date scientific data on the state of the resources affected by the imminent MAP, especially following the application of emergency measures which have already led to a reduction in fishing effort relative to the two species in question, with the associated socio-economic impact on the sector"*. [LINK](#)

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Q2 - 5. The CFP shall be coherent with the Union environmental legislation, in particular with the objective of achieving a good environmental status by 2020 as set out in Article 1(1) of Directive 2008/56/EC, as well as with other Union policies Do you believe that the objective has been achieved (1= not at all; 2= Partly; 3= Fully)

- **Answer: Not at all**

Ref 236/2020 GFCM Strategy 2021-2025-Integration of the previous MEDAC contribution (ref.217/2020) *"The Working Group 1 highlighted that the forthcoming Multiannual Plans should take into consideration the following environmental variables as additional factors, other than fishing mortality, influencing the stocks patterns in an ecological perspective:*

✓ *climate change and its consequences on salinity, nutrients, waters stratification, plankton availability, recruitment success etc.*

✓ *plastics impact on the food web and on the growth of the assessed stocks*

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- **Q4 - What are the key challenges in implementing the CFP?**

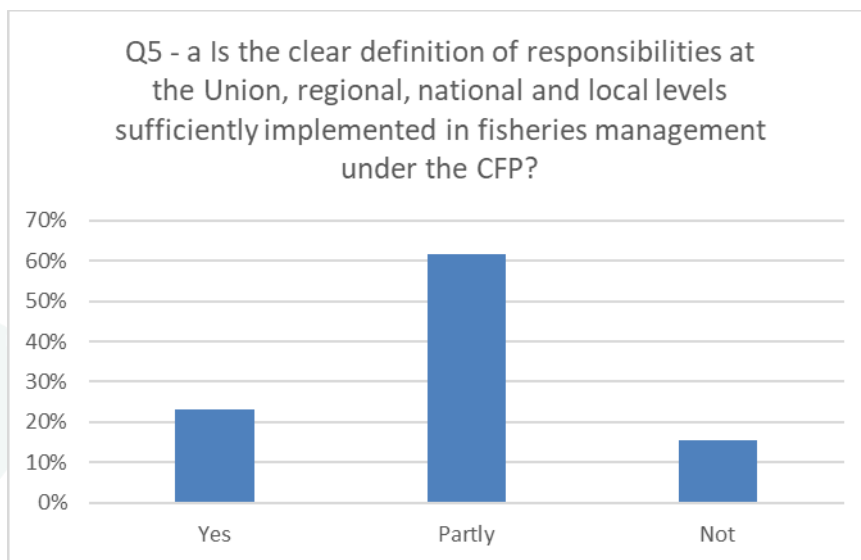
- regionally adopted measures **ZZRS (Slovenia 60%)**
- between neighbouring countries **ZZRS (Slovenia 60%)**
- targeted species **ZZRS (Slovenia 60%)**
- excessive bureaucracy **Federpesca (Italy 60%)**
- Incorrect technical measures **Federpesca (Italy 60%)**
- Lack in the co-management by MSs **CEPESCA (SPAIN 60%)**

- Need of an increasing interaction with the integrated marine policy. **AGCI Agrital – Federcoopesca - Legacoop (Italy 60%)**
- The best scientific advice should privilege the local scientific experts **FNCP (SPAIN 60%)**
- To achieve sustainable fishing without destroying businesses and jobs, to make the environment and resources sustainable at the same time and at the same level as the socioeconomic. **EMPA (SPAIN 60%) – Federpesca (Italy 60%) – CEPESCA (SPAIN 60%) - AGCI Agrital – Federcoopesca - Legacoop (Italy 60%) - FNCP (SPAIN 60%)**
- Listen and take into account the opinion and advice of the Fisheries Sector. It is not true that the interests of seafarers are taken into account and, precisely for this reason, the interests of consumers are not taken into account. **UNACOMAR (SPAIN 60%) – CNPMM French fishery sector – Federpesca (Italy 60%) – Uinci Agroalimentare**
- The prevalent small scale of the vessels and the weakness of markets dynamics lacking on the catches added value. **Coldiretti (Italy 60%)**
- The achievement of MSY is a theoretical objective which doesn't take into account the European mixed fishery, the environmental changes, the interactions between stocks and, coupled with the utopic landing obligation, it cannot be achieved for all the stocks. **CNPMM French fishery sector - FNCP (SPAIN 60%)** Moreover, any amendment that would establish a biomass objective or go beyond the MSY, as proposed, in particular, in the "biodiversity strategy" will be accepted. **CNPMM French fishery sector**
- The ecosystem approach is not applied in the fishery management, considering that it is a complex approach. **CNPMM French fishery sector - AGCI Agrital – Federcoopesca - Legacoop (Italy 60%)**
- The improvement of expertise on all stocks is needed in order, in particular, to increase the number of stocks subject to analytical evaluation and thus to increase the number of stocks having reached the MSY. This improvement in expertise should also be accompanied by an adaptation of management methods to knowledge and risk propensity. **CNPMM French fishery sector**
- The enforcement of landing obligation (art. 15 of CFP) is too complex to be complied both for fishers and for MS, especially for derogations and the regionalised approach. **CNPMM French fishery sector**
- Moreover, the landing sites are not equipped for the implementation. **CEPESCA (SPAIN 60%)**
- The data sharing and the scientific collaboration between MSs especially related to the studies required for the LO derogations should be improved. **CNPMM French fishery sector**
- Implementation and enforcement challenges remain often due to Member States inaction, decreased ambition, insufficient oversight by the European Commission and industry resistance to change. **WWF (40%)**
- Decisions are often taken in order to maintain the status quo or weaken the impact of the CFP requirements, hence going against the ambition foreseen by the CFP. The precautionary approach is not duly observed in setting catch limits, non-compliance with the landing obligation is widespread, and the ecosystem-based approach to fisheries management suffers, inter alia, from a lack of alignment between environmental and fisheries policies and authorities. This lack of alignment and

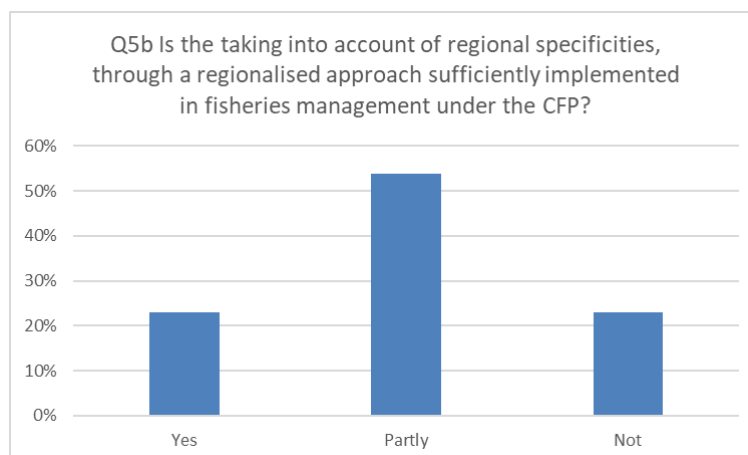
consistency is also found between the CFP and other EU policies on environment, trade, labour, health, inter alia. **WWF (40%)**

- More also needs to be done to improve control, inspections and data collection, and to better align the internal and external dimension of the CFP, as well as in promoting a culture of compliance by ensuring a level playing field between EU and non-EU vessels. More traceability and control of imports is also needed. **WWF (40%) – CNPMM and French sector**

Q5a Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (a) the clear definition of responsibilities at the Union, regional, national and local levels Multiple choice (Single answer): Yes/Partly/No



Q5b Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (b) the taking into account of regional specificities, through a regionalised approach Multiple choice (Single answer): Yes/Partly/No



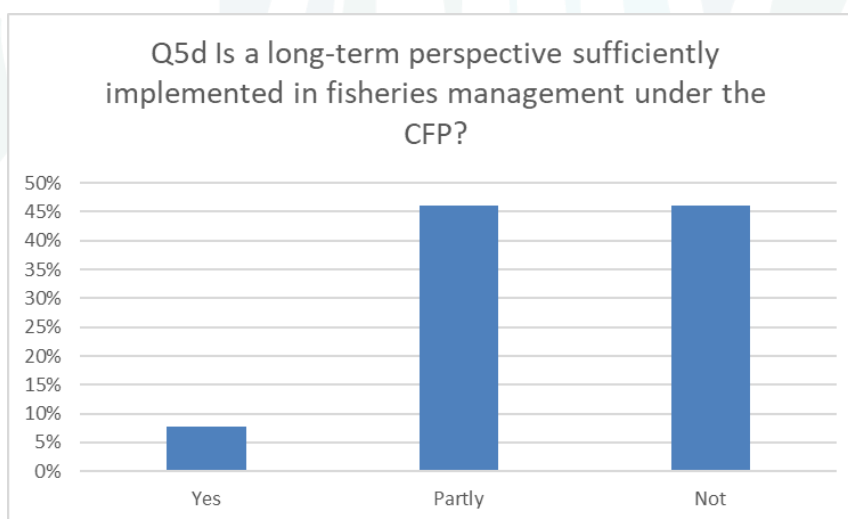
Q5c Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (c) the establishment of measures in accordance with the best available scientific advice

- Answer: Partly

Ref 204/2020 MEDAC opinion on the MAP for Small Pelagic resources in the Adriatic "The sector has repeatedly emphasised the difficulty in preparing an opinion in the absence of upto-date scientific data on the state of the resources affected by the imminent MAP, especially following the application of emergency measures which have already led to a reduction in fishing effort relative to the two species in question, with the associated socio-economic impact on the sector". [LINK](#)

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Q5d Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (d) a long-term perspective Multiple choice (Single answer) Yes/Partly/No



Q5f Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (f) appropriate involvement of stakeholders, in particular Advisory Councils, at all stages - from conception to implementation of the measures

- Answer: Partly

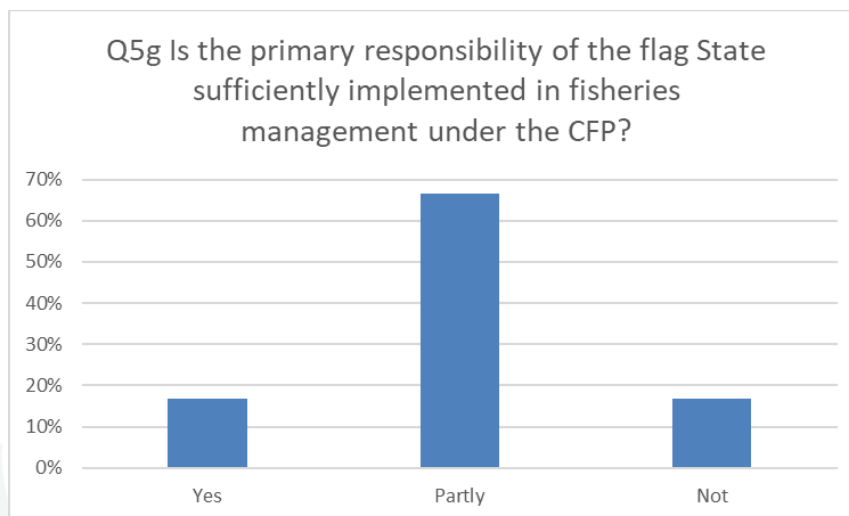
See the *draft Joint-AC letter on contributions from Advisory Councils in Commission public consultations*

Ref.: 18/2022 MEDAC SUPPLEMENTARY ADVICE NOTE ON EU PUBLIC CONSULTATIONS "[...] In view of this: is it appropriate to use the same format for individuals as for ACs? Is it fair to give the same

weight and importance to the opinion of an entity which represents an entire community and to that of individual citizens? We believe that both the format and the consideration given to the responses should be reviewed and diversified on the basis of the type of stakeholder providing these responses."

[LINK](#)

Q5g Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (g) the primary responsibility of the flag State Multiple choice (Single answer) Yes/Partly/No



Q5h Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (h) consistency with other Union policies - Answer: Partly

It is work in progress in the framework of the EU Green Deal (and MEDAC WG3 Green Deal as a direct effect)

Q5i Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (i) the use of impact assessments as appropriate - Answer: No

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will be not able to assess the effect of the MAP's application - the socio-economic impact of the measures should be assessed." [LINK](#)

Q5k Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP? (k) transparency of data handling [...], with due respect for private life, the protection of personal data and confidentiality rules; availability of data to the appropriate scientific bodies,[...] and other defined end-users.

- Answer: Yes

See MEDAC participation at the scientific WGs of STECF and GFCM

Q6. Specifying which plan you work with, are the multiannual plans effective tools for ensuring the sustainable exploitation of fish stocks? Are the plans sufficiently flexible, too flexible, or too rigid in operation?

- MAPs could be more effective if they were managed more horizontally in consensus with operators.

EMPA (SPAIN 60%) – UNACOMAR (SPAIN 60%)

- The introduction of a range of FMSY has been a positive improvement towards flexibility, but it is still too limited their implementation. Although this management indicators should be recognised by third countries. As for the multi annual aspect of TACs, there is still work to be done. Indeed, the variations in TACs from one year to the next, sometimes significant, limit the possibilities of fleet adaptation and prevent the consideration of socio-economic constraints, which can only be assessed over the medium or long term. New management decisions should apply a fair balance between the environmental and socio-economic aspects. **CNPMEM French fishery sector**

- The MAPs are effective management tools (**UNCI Agroalimentare**) but too rigid when implemented. **Federpesca (Italy 60%) – Coldiretti (Italy 60%).**

- The level of ambition of most of the MAPs was reduced. The regionalisation process was an important element of the reformed CFP, however it must be ensured that MAPs serve their original purpose, as regionally tailored, ecosystem-based conservation measures based on the precautionary approach. They must cover all fisheries comprehensively and include clear environmental and socio-economic objectives. MAPs should also include selectivity and bycatch mitigation measures, and help reduce the harmful impacts of fisheries on marine species and habitats. All this calls for better scrutiny, evaluation and revision of MAPs to be fit for purpose. **WWF (40%)**

- MAP small pelagics Adriatic - sufficiently flexible **ZZRS (Slovenia 60%)**

- MAP demersal West Med – The plan is not flexible, the measures are imposed by the EC and it is a tool to carry out a conversion aimed to reduce the fleet to the minimum expression (or below the threshold) without setting up accompanying or compensatory measures, then the entire cost of such conversion will be up to the fisheries sector itself, which is the victim of the most designed and worst-implemented policies. **UNACOMAR (SPAIN 60%) – CEPESCA (SPAIN 60%) - FNCP (SPAIN 60%)**

- MAP demersal West Med – A multiannual plan could be a good tool, But today the Western Mediterranean is driven by individual political desires rather than by solid scientific data adapted to specific areas and taking into account the socioeconomic aspect of fishing. For a long time scientists and fishermen supported by some member states are asking for more realistic and flexible deadlines

to reach the MSY. **CEPESCA (SPAIN 60%) – FNCP (SPAIN 60%)** The deadline of reaching MSY should be postponed to 2030. **FNCP (SPAIN 60%)**

- MAP demersal West Med – The possibility offered by the Western Waters Management Plan to adopt operating rules via regionalisation, thus opening up the possibility of implementing multi annual management, should be better explored. On the other hand, the usefulness of applying several management tools to the same stock should be discussed again. The professional sector considers that in certain situations, quotas are best able to produce a good result without the need to add capacity management, and vice versa. For example, multiannual plans should include all relevant stock management modalities, such as TAC definition modalities, exemptions from the landing obligation and technical measures (with formalization of target fisheries) or the related control provisions. They should also evolve to facilitate, in certain situations, the implementation of the ecosystem approach, by taking into account the impact of anthropogenic factors other than fishing. **CNPMEM French fishery sector**

- MAP demersal West Med – The MAP does not achieve the overall objectives of the CFP; it has been drawn up without prior assessment of the socio-economic impacts, and this is also why in the first years of implementation it has caused damage to businesses and their profitability. The instruments provided for in the Regulation are excessively rigid, do not allow for sufficient gradual application of the rules; they are based on data from previous years that do not take into account the improvements made by the measures themselves. There is also excessive use of delegated acts. **AGCI Agrital – Federcoopesca - Legacoop (Italy 60%)**

- MAP demersal West Med – The measures foreseen by the MAP in relation to hake are examples of bad administration. The PCP regulation should be followed so the best scientific advice should be taken into consideration. **FNCP (SPAIN 60%)**

Q7a. Do the multiannual plans cater sufficiently for the regional characteristics of fisheries?

- Answer: No

Ref 18/2022 MEDAC SUPPLEMENTARY ADVICE TARGETED CONSULTATION ON THE ACTION PLAN TO CONSERVE FISHERIES RESOURCES AND PROTECT MARINE ECOSYSTEMS “The study reveals that “otter trawls cause the lowest depletion followed by beam trawls and towed dredges. Depletion rates are lower in sand than in gravel and mud, with recovery rates” (page1) that are different from case to case: “we recommend regional analyses to refine parameters for local specificity”. [LINK](#)

Ref. 60/2020 MEDAC opinion for a Joint recommendation on the definition of “direct fishing” pursuant to Article 15 and Article 27 paragraph 7 of Regulation (EU) 1241/2019 “Moreover, MEDAC once again draws attention to the issue of limitations to the height of purse seines (see art.13.3, 2nd sentence of Reg.(CE) 1967/2006) that causes technical difficulties, particularly in certain low-depth areas (i.e. north Adriatic sea), considering also the studies clearly demonstrating the absence of environmental impact, as repeatedly reported in the MEDAC past positions. (MEDAC opinions n. 102/2017, 13/3/2017; 128/AV, 11/09/2015).” [LINK](#)

Q7b. Are the plans used to their full potential? Multiple choice (Single answer) Yes/No

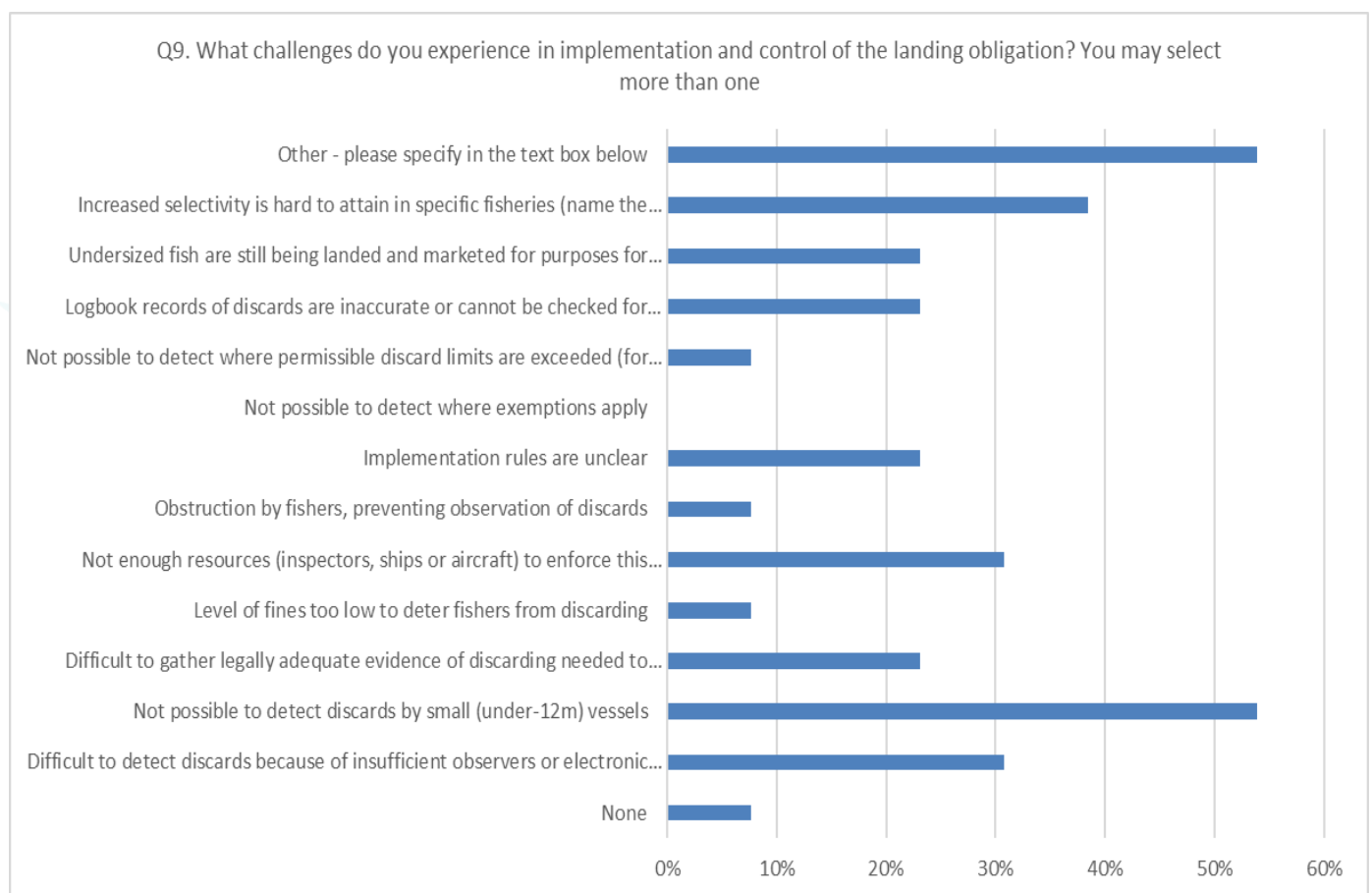
- 100% Not (13 answers)

Q8. To what extent (scale 1 to 5) is the objective of eliminating discards met? 1. Not at all - 2. Poorly - 3. Moderately - 4. Incompletely - 5. Fully

- Answer: Poorly

Ref.21/2020 Annual report on the implementation in 2019 of the Landing Obligation- Your letter ref. Ares (2019)7821069 - 19/12/2019 Mediterranean derogations on landing obligation due to disproportionate costs or high survivability [LINK](#)

Q9. What challenges do you experience in implementation and control of the landing obligation? You may select more than one:



Options:

- Difficult to detect discards because of insufficient observers or electronic monitoring tools
- Not possible to detect discards by small (under-12m) vessels
- Difficult to gather legally adequate evidence of discarding needed to make a successful prosecution
- Level of fines too low to deter fishers from discarding
- Not enough resources (inspectors, ships or aircraft) to enforce this obligation
- Obstruction by fishers, preventing observation of discards
- Implementation rules are unclear
- Not possible to detect where exemptions apply
- Not possible to detect where permissible discard limits are exceeded (for de minimis exemptions)
- Logbook records of discards are inaccurate or cannot be checked for verification
- Undersized fish are still being landed and marketed for purposes for direct human consumption
- Increased selectivity is hard to attain in specific fisheries (name the fisheries)

Q9a. Which good practice or innovative tools could address these challenges in implementation and control?

- Advise fishermen on specific obligations. **ZZRS (Slovenia 60%) - Federpesca (Italy 60%)**
 - Simple and clear rules. **Federpesca (Italy 60%)**
 - Economic support and incentives for fishers to support the discards landing and their selling to non-human consumption. **Federpesca (Italy 60%)**
 - Improvement of control activities (**Unci Agroalimentare**) in the markets, fish markets, restaurants, etc **Coldiretti (Italy 60%)**
 - Selectivity improvement. **Unci agroalimentare**
 - Reduction of the heavy costs in the discard's management. **Coldiretti (Italy 60%)**
 - The Electronic logbook could already automatically record and fill in data such as location, date/hour/launch (as the boats have gps, blue or green box, etc.) to reduce the fisher's burden. **CEPESCA (SPAIN 60%)**
 - Self-management or co-management organised by representative organisations/POs/consortia could overcome the problem of controls. (see Shellfish Management Consortia experience in Italy) **AGCI Agrital – Federcoopescas - Legacoop (Italy 60%)**
- In addition to the profession's constant efforts to improve selectivity, through numerous projects that have been launched, even after the granting of exemptions, several ways of adapting Article 15 could be considered. The selectivity improvement is the best way to address this issue. The following measures could be implemented:
- The list of covered species could be delimited again. A specific list of species and for which such an obligation would have meaning would thus be specified, in the basic regulation or by basin. The species already recognized to have a high survivability by STECF can be already excluded by the LO list: reptiles, elasmobranchs, bivalves and gastropods and crustaceans.
 - exclusion of certain gears (which have very few by-catches, for example, or have generally good survival rates)
 - simplification of derogation request
 - the removal of TACs for certain by-catch and the restriction of TACs to certain gear groups could also solve some choke species
 - while full catch reporting is necessary to manage stocks, the full landing reporting is not. It would then be interesting to consider a reporting obligation (and imputation on exemptions or quotas, as is currently the case), not coupled with a landing obligation. Indeed, there is very little value for these landed catches and, if these catches are properly considered in the management of stocks, it is not useful to land them. **CNPMEM French fishery sector**
- None. **EMPA (SPAIN 60%)**
 - Pay attention to fishermen, stop treating them like criminals, and design and implement realistic measures, which serve the sustainability of the resource but also the economic and social sustainability of fishing activity. **UNACOMAR (SPAIN 60%)**
 - Facilitating the implementation of the landing obligation requires a multifaceted approach combining, inter alia, further development and uptake in the use of more selective gear to reduce unwanted catches, in line with article 14, which can be associated with temporal and spatial closures;

an ecosystem-based approach to maritime spatial planning guiding fishers away from areas where undersized fish are more likely to occur; effective MCS systems as discussed above; but also a better use and valorisation of unwanted catches (with due regards to article 2(5)(b) of the CFP) and (EMFAF) investments in land-based storing and processing equipment for unwanted catches. (Economic) incentives can also be used (e.g. through article 17) by rewarding best practitioners. Improved dialogue and collaboration (e.g. through co-management) must be ensured to promote a culture of compliance and avoid further alienating fishers struggling with and/or opposed to the landing obligation. **WWF (40%)**

Q9b. What further pilot projects (if any) should be conducted to explore methods for avoiding, minimising or eliminating unwanted catches?

By definition the unwanted catches are unpredictable and sometimes unavoidable. **EMPA (SPAIN 60%)**

- Pilot projects in collaboration with scientists aimed to increase selectivity **Unci agroalimentare** considering the socioeconomic effects and supporting innovative solutions through economic and administrative help. Simplification of bureaucracy and economic support would facilitate the transition. **CEPESCA (SPAIN 60%) - FNCP (SPAIN 60%)**

- The improvement of catches valorisation in the market would provide the same profit reducing the fishing activities and an income improvement would support the enlargement of mesh sizes. **Coldiretti (Italy 60%)**

- European fleet already apply updated technologies and measures to minimise unwanted catches. What you can't do is get to the absurd. The Scientific Centres which exist in the various Member States should be co-operated, with research also being "regionalised". Scientific experts in collaboration with the professional sector will develop the measures most suitable to each reality. It cannot continue to be legislated from the offices. It is necessary to be on the side of the Fisheries Sector and the Scientists. **UNACOMAR (SPAIN 60%)**

- Methods for avoiding, minimising or eliminating unwanted catches have been identified and tested by scientists and fishers in EU-funded projects (e.g., Minouw, DiscardLess, IMPLMED) and other are upcoming. What is lacking is political will on the part of the Member States to implement the Technical Measures Regulation to improve the selectivity of fishing gears, adopt selective measures, develop avoidance techniques and deliver science-based joint recommendations. In addition, the lack of adequate control and enforcement do not provide fishers with an incentive to apply avoidance techniques or invest in selective gears. Requiring an e-logbook for all EU vessels will help create full documentation of catches, which can be used to demonstrate industry efforts to reduce unwanted catches, to assess the effectiveness of mitigation measures and identify new ones, as well as to inform scientific assessments.

All potential mitigation measures must be applied to minimise unwanted catches. Exemptions (such as de minimis) should be used only as a means of last resort. Other governance measures remain unexplored, such as the reallocation of quota shares (relative stability) among MS, considering among

other criteria the likely composition and abundance of catches of their fleets; and the allocation of fishing opportunities at national level based on criteria such as selectivity (in line with CFP Article 17). In parallel, the testing of alternative fishing gears with purpose to minimize by-catch of sensitive species in different EU waters must continue. **WWF (40%)**

Q9c. Which incentives in the CFP Regulation are the most relevant and successful? With incentives we mean, including those of economic nature such as fishing opportunities, that promote fishing methods which contribute to more selective fishing

- Temporary closures incentives. **ZZRS (Slovenia 60%)**
- The EMFAF should support the expenses due to larger mesh sizes and more selective fishing gears. **Coldiretti (Italy 60%) - CEPESCA (SPAIN 60%)**
- Incentives of 100% for public contribution to fishers improving gears selectivity. **Federpesca (Italy 60%)**
- Incentives aimed to research activities on selective gears and data collection on stocks. **Unci agroalimentare**
- Self-management or co-management organised by representative organisations/POs/consortia could overcome the problem of controls. (see Shellfish Management Consortia experience in Italy) **AGCI Agrital – Federcoopescas - Legacoop (Italy 60%)**
- None. **EMPA (SPAIN 60%)**
- The fishing opportunities are not incentives, as they are useful only as a way to further reduce them. **UNACOMAR (SPAIN 60%)**
- Fishing opportunities are a great incentive because it is what allows a fishing company to go ahead, so it can become a good tool if done with flexibility and good timing. **CEPESCA (SPAIN 60%)**
- Fleet renewal to improve safety on board and reduce the ecological impact. The fishery fleet, especially SSF, is very obsolescent. The generational turnover is needed. The access to EMFAF should be simplified especially for engine renewal. The temporal closures should be improved with positive effects on the fishery sector. Instead, permanent closures should be applied only in cases where it is the only method for balancing the fishery. **FNCP (SPAIN 60%)**
- Access to fishing opportunities is the most relevant incentive to fishers, followed by access to public funds. Yet, the current implementation of the CFP Regulation fails to leverage these incentives in order to increase the sustainability of the fishing fleet, and the lack of control and enforcement does not provide a counterweight to the absence of adequate incentives. Article 17, although a powerful incentivizing tool towards more selective and low impact fishing methods, remains to be successfully implemented and used to its full potential. Article 17 must be used to create economic incentives for the effective implementation of the landing obligation through rewarding fishers using more selective gears and methods by reserving a percentage of quotas and fishing efforts for best practitioners within a fishery. The EC should support MS in doing so by providing guidance (e.g. as to the criteria to use), and by providing a more precise definition on low-impact fishing. **WWF (40%)**

Q9d. How do you see your role and the role of other stakeholders in implementing and monitoring the landing obligation?

- Stakeholders should be involved, advised about obligations **ZZRS (Slovenia 60%) - Federpesca (Italy 60%)**

- Operators play a FULL role in this absurd rule. **EMPA (SPAIN 60%) – UNACOMAR (SPAIN 60%)**

- Sharing the solutions design and methods for using discards. **Federpesca (Italy 60%)**

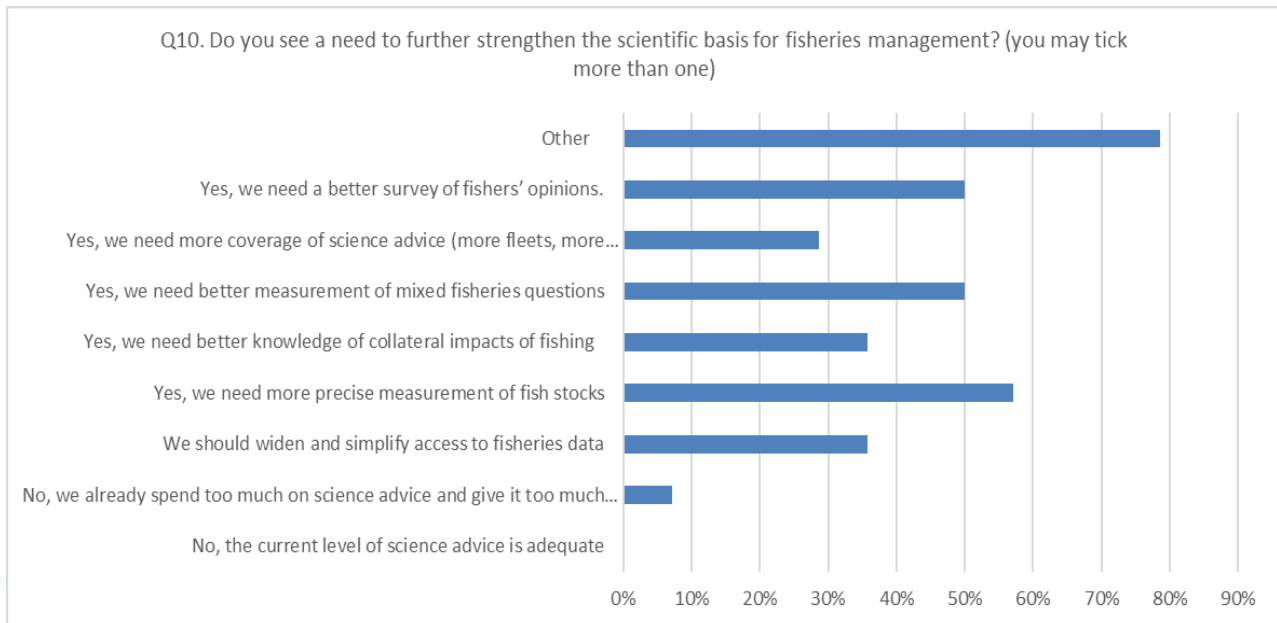
- Explanation of the importance of a correct data transmission **Coldiretti (Italy 60%)** and training courses on how to fulfil the electronic logbook or providing procedures compliance methods much simpler and more accessible. **CEPESCA (SPAIN 60%)**

- Self-management or co-management organised by representative organisations/POs/consortia could overcome the problem of controls. (see Shellfish Management Consortia experience in Italy) **AGCI Agrital – Federcoopescas - Legacoop (Italy 60%)**

- Improve governance and take into account the advice of professionals towards a better applicability of standards (including the implementation of the landing obligation): At the national level, the professionals stress the difficulties of implementation on the ships (understanding of the authorisations or not of rejection, inscription on the logbooks, monitoring and control, sorting and storage, etc.). A simplification of the work carried out in regionalization seems necessary because in terms of governance, the drafting of discards plans for example monopolizes the discussions in regionalization, hiding the possibility for the Member States to take full control of other subjects. Moreover, once the discards plan has been evaluated by the STECF, exchanges with the EC must be conducted over an extremely short period of time at the end of the summer, in order to finalise a delegated act which ultimately contains only what seems acceptable to the EC. Overall, in constructing the exemptions, better coordination between Member States would be a considerable asset. Since an exemption may concern several countries, in the same area or in an adjacent area, the sharing of the raw data from the studies carried out by the various Member States could make it possible to justify requests for extrapolation of the data. **CNPMEM French sectors**

- Civil society has an important role to play in improving selectivity in EU fisheries, both by initiating pilot projects, studies, trials, etc., and by ensuring the widespread distribution of their results to help identify the best ways forward. In doing so, civil society can support MS efforts to implement article 15. The latter is also supported through civil society's involvement in Advisory Councils. Key stakeholders - fishers, NGOs, civil society, scientists, management authorities - must work hand-in-hand to develop, in an inclusive and informed manner, practical solutions to the persisting lack of implementation of article 15, and the challenges faced by fishers. We are of the opinion that the LO has not been given a chance to work and that the underlying problems (severely overexploited stocks in mixed fisheries, lack of fishing gear selectivity, lack of incentive to avoid unwanted catches, allocation of fishing opportunities that is disjointed from fishing patterns) can and must be tackled under the existing framework. **WWF (40%)**

Q10. Do you see a need to further strengthen the scientific basis for fisheries management? (you may tick more than one)

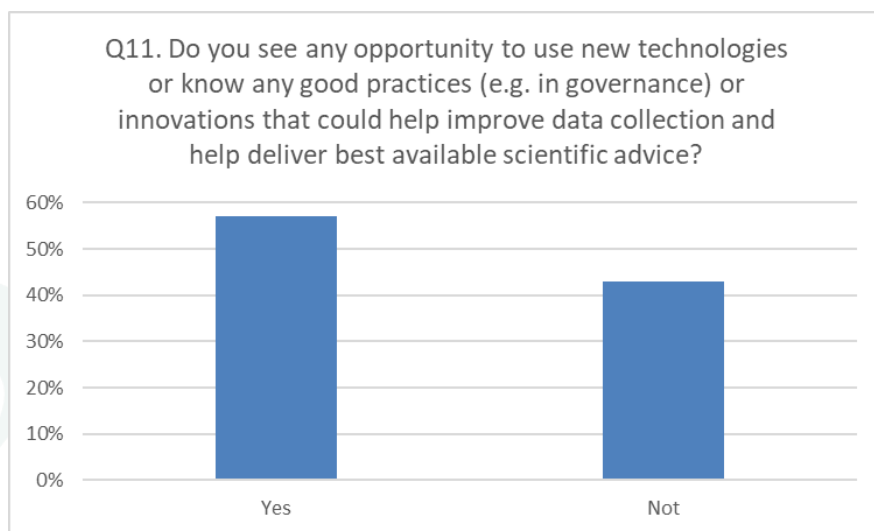


Q10a. If ticked yes, please specify the specific data needs or governance questions that would need to be covered for this further strengthening

- Data: discards and length frequencies **ZZRS (Slovenia 60%)**
- Predator/prey relationships and the impact of fisheries on species across the ecosystem. **WWF (40%)**
- Ecosystem approach to fisheries management. **WWF (40%) - AGCI Agrital – Federcoopescas - Legacoop (Italy 60%)** This movement towards ecosystem advice and EBFM should be supported more actively by the EU through the CFP. **WWF (40%)**
- More evaluations should be made to know the results of the measures that are implemented before proposing and/or implementing new measures with the same objective. If they overlap, the effectiveness of each is not known. **EMPA (SPAIN 60%)**
- It is very important to reduce the distance with the reality of fishing activity by those responsible in the administrations and in the Community institutions. **UNACOMAR (SPAIN 60%)**
- pressures exerted by other anthropogenic activities such as aggregate extraction, recreational fishing or offshore wind energy. **CNPMEM French fishery sector**
- effects of climate change. **CNPMEM French fishery sector**
- observations made at sea and the maintenance, even strengthening, support for scientific-fishing partnerships. **CNPMEM French fishery sector - FNCP (SPAIN 60%)**
- fill the gaps that currently exist in stock assessment and monitoring. **CNPMEM French fishery sector**
- the fishing opportunities should be assessed in the light of social and economic objectives, through the conduct of real impact studies, which should be the role of STECF. **CNPMEM French fishery sector**

- external perspective through a counter-expertise, in addition to the opinions of the ICES, on the management measures proposed by the Commission, coupled with the conduct of socioeconomic impact studies. **CNPMEM French fishery sector**
- Urgent need of knowledge on the socioeconomic impact of the management measures of the West Med MAP. **CEPESCA (SPAIN 60%)**
- Need of wider scientific basis on socioeconomic level. **AGCI Agrital – Federcoopesca - Legacoop (Italy 60%)**

Q11. Do you see any opportunity to use new technologies or know any good practices (e.g. in governance) or innovations that could help improve data collection and help deliver best available scientific advice? Multiple choice (Single answer): Yes/No



Q12. Do you consider that Member States implement the requirements set out in Articles 16 and 17 in a satisfactory manner? Please explain. "Article 16 Fishing opportunities:

1. Fishing opportunities allocated to Member States shall ensure relative stability of fishing activities of each Member State for each fish stock or fishery. [...] Article 17: Criteria for the allocation of fishing opportunities by Member States. When allocating the fishing opportunities available to them, as referred to in Article 16, Member States shall use transparent and objective criteria including those of an environmental, social and economic nature."

- No, the criteria of fishing opportunity's location are not transparent. **Federpesca (Italy 60%)**
- There is little flexibility, particularly with regard to the fishing days available which should be left to the discretion of the undertakings within the identified time frame. **Coldiretti (Italy 60%)**
- The Member States (in our case, Spain) scrupulously apply these requirements, within their possibilities and competences, which are severely limited by the current regulations.

- The scientific implementation reports are decided, evaluated and monitored by Commission bodies, which in each case determine their implementation. The satisfaction (or not) of the application of these requirements is ALWAYS conditional. **EMPA (SPAIN 60%)**

- Some Member States already recognise that the reduction of fishing days in the Mediterranean for the trawl fleet is not fair and should be relaxed at least until the effect of previous years is known, after a good scientific study. **UNACOMAR (SPAIN 60%) – CEPESCA (SPAIN 60%)**

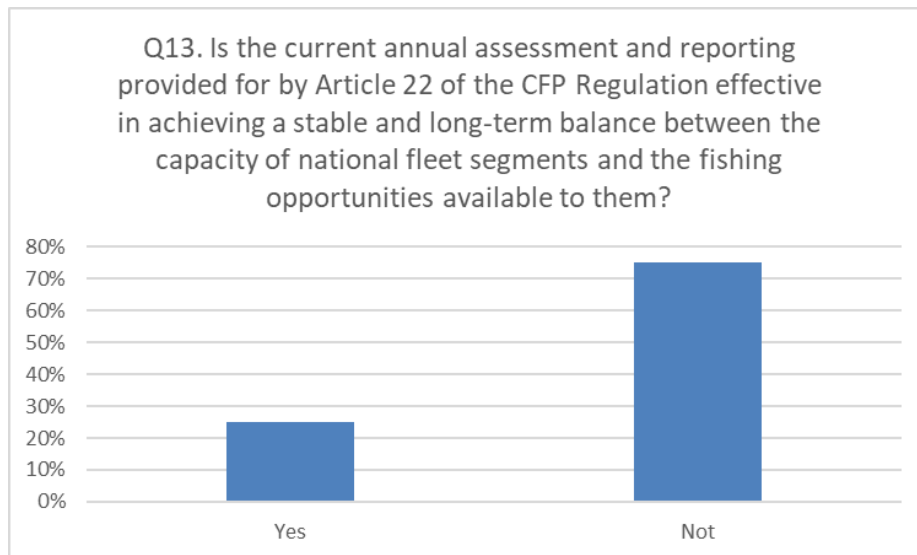
- The allocation of fishing opportunities should take into account the SSF vessels, including coastal trawling with a reduced environmental impact: MS can effectively apply this process, only if EU agrees on this. **FNCP (SPAIN 60%)**

- The National Committee for Marine Fisheries and Aquaculture considers that the way in which the Commission consults with stakeholders on the issue of the “fishing opportunities” tool is considerably reductive in terms of the place of quotas in the management of the resource, beyond the question of the implementation of Articles 16 and 17 of the CFP on the arrangements for allocating these fishing opportunities. Moreover, the possibility offered by the Western Waters Management Plan to adopt operating rules via regionalisation, thus opening up the possibility of implementing multi annual management, should be better explored. In addition, the utility of applying several management tools to the same stock should be discussed at the management plan level. Professionals consider that in certain situations, quotas are best able to produce a good result without the need to add capacity management, and vice versa. **CNPMEM French fishery sector**

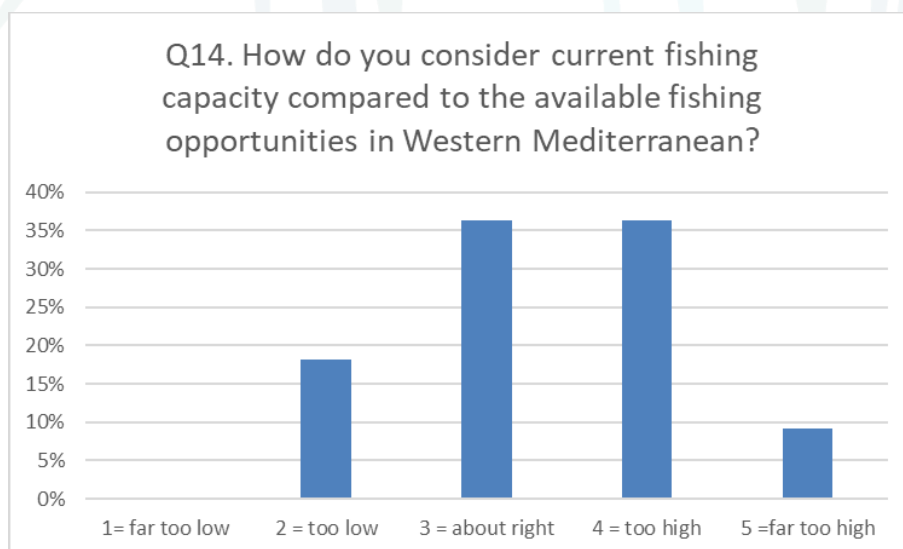
- Despite the Art. 16, many of the annual Total Annual Catches (TACs) have been year by year agreed by the ministers of the EU Fisheries Council (AGRIFISH) above scientifically advised level of fishing mortality at MSY (i.e. the fishing mortality was agreed at higher levels than requirements set out in article 2.2), and despite the fact that MSY should be a limit, not a goal, in order to comply with the precautionary and ecosystem-based approach to fisheries management. **WWF (40%)**

Member States have however, so far, overwhelmingly failed to fully implement art. 17. The legal obligation to include criteria of both an environmental, social and economic nature has been overlooked, and most allocation systems are still neither transparent nor objective. The adoption of article 17 led to very little change in Member States, where most allocation systems remain based on historical catches. In doing so, MS fail to harness the full potential of article 17 in incentivizing more sustainable practices and in rewarding best practitioners, while maintaining a status quo which disproportionately favors certain fleet segments to the detriment of others, and risks reinforcing overfishing patterns and unfair tenure systems rather than encouraging more sustainable practices. Regrettably, the European Commission has so far failed to hold MS accountable for their insufficient implementation of article 17, or to provide more guidance to support them. **WWF (40%)**

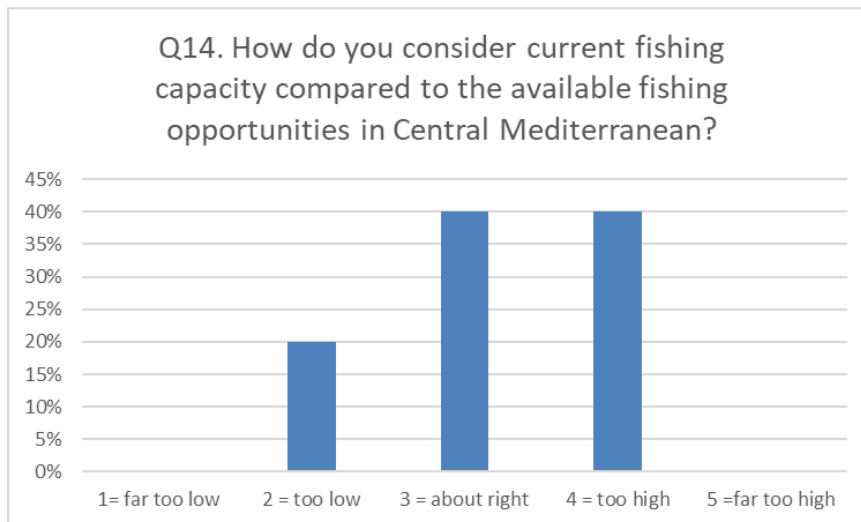
Q13. Is the current annual assessment and reporting provided for by Article 22 of the CFP Regulation effective in achieving a stable and long-term balance between the capacity of national fleet segments and the fishing opportunities available to them? Multiple choice (Single answer): Yes/No



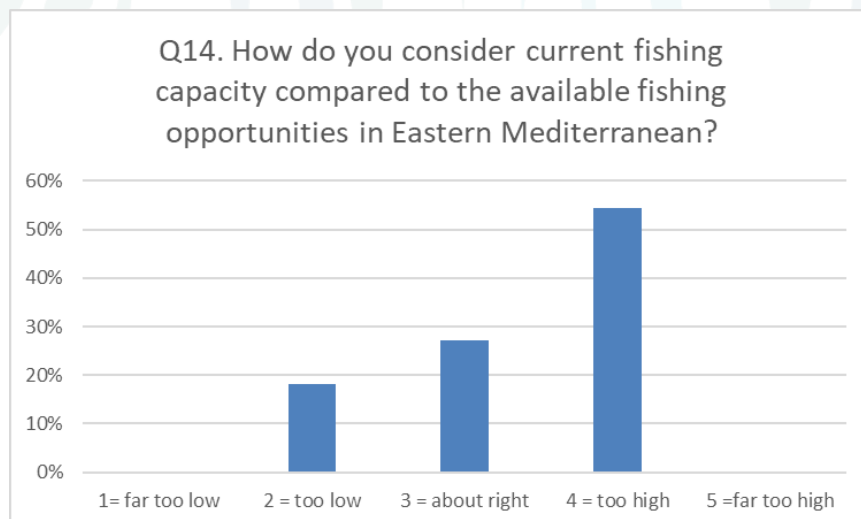
Q14. How do you consider current fishing capacity compared to the available fishing opportunities in Western Mediterranean? Enter 1= far too low, 2 = too low, 3 = about right, 4 = too high, 5 =far too high



Q14. How do you consider current fishing capacity compared to the available fishing opportunities in Central Mediterranean? Enter 1= far too low, 2 = too low, 3 = about right, 4 = too high, 5 =far too high

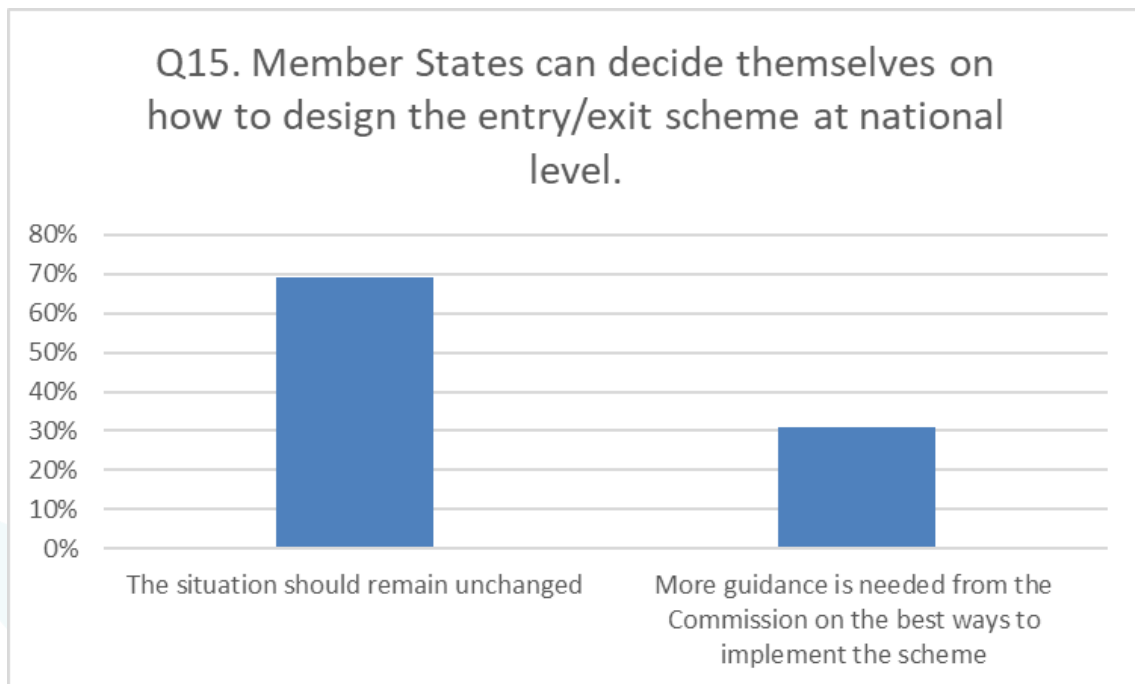


Q14. How do you consider current fishing capacity compared to the available fishing opportunities in Eastern Mediterranean? Enter 1= far too low, 2 = too low, 3 = about right, 4 = too high, 5 =far too high

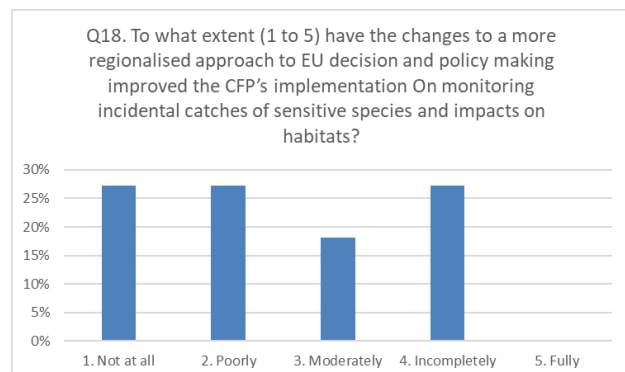
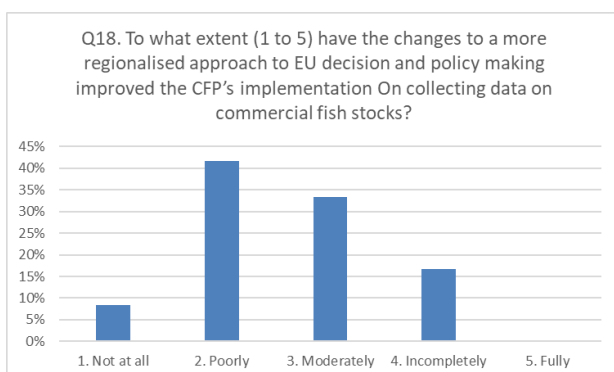


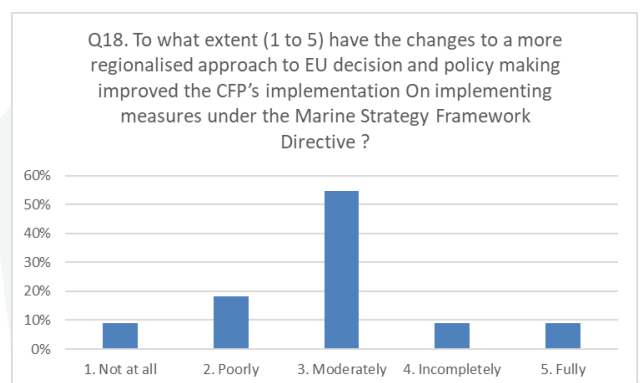
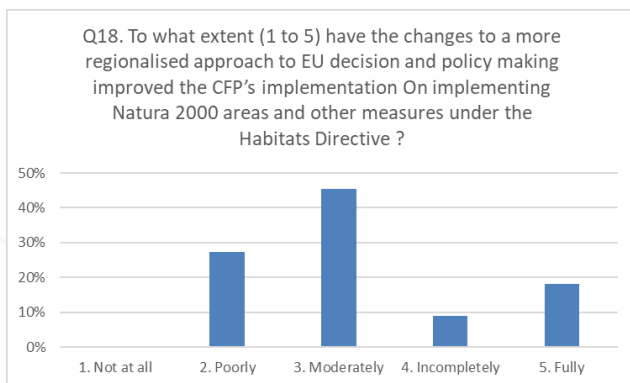
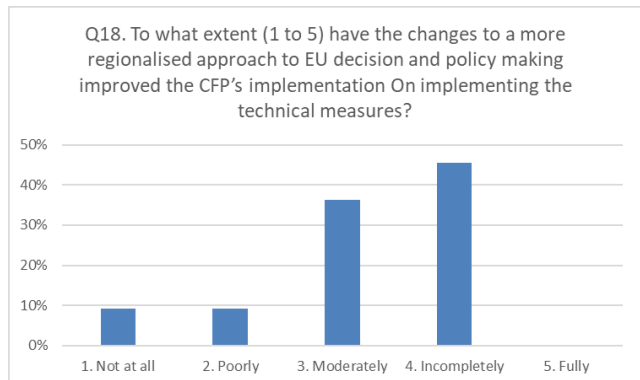
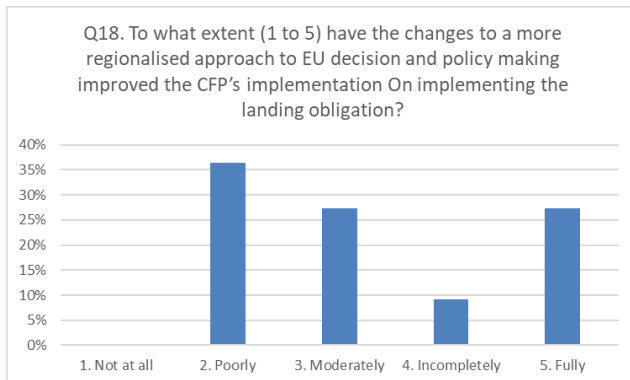
Q15. Member States can decide themselves on how to design the entry/exit scheme at national level. Please indicate whether:

- The situation should remain unchanged
- More guidance is needed from the Commission on the best ways to implement the scheme



Q18. To what extent (1 to 5) have the changes to a more regionalised approach to EU decision and policy making improved the CFP's implementation? (1. Not at all; 2. Poorly; 3. Moderately; 4. Incompletely; 5. Fully)





Q19. Would you see the need for further improving the decision-making process?

Answer: Yes

See the draft Joint-AC letter on contributions from Advisory Councils in Commission public consultations Ref.: 18/2022 MEDAC SUPPLEMENTARY ADVICE NOTE ON EU PUBLIC CONSULTATIONS " [...] In view of this: is it appropriate to use the same format for individuals as for ACs? Is it fair to give the same weight and importance to the opinion of an entity which represents an entire community and to that of individual citizens? We believe that both the format and the consideration given to the responses should be reviewed and diversified on the basis of the type of stakeholder providing these responses." [LINK](#)

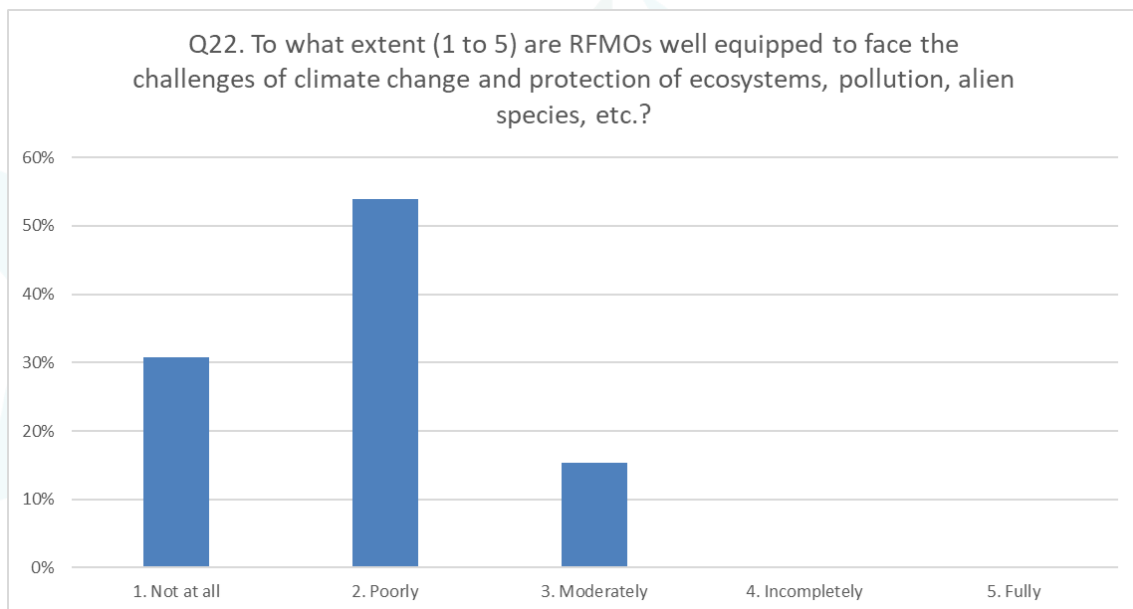
Q20. How can regionalisation feed into consultations with neighbouring third countries where necessary to take effective measures for stocks of common interest? Please give examples of good practice that you have encountered.

RFMOs such as GFCM: the MEDAC is contributing to the GFCM measures in the Med through advice sent to DG MARE, then intergrated almost partially in the DG MARE management proposals to GFCM. The MEDAC received the award of the best practices for SSF organizations (High level conference on sustainable SSF, Malta September 2018).

Q21. How could the EU further improve the performance of the Regional Fishery Management Organizations (RFMOs) in sustainably managing fisheries resources?

Ref 79/2020 MEDAC opinion on the contribution to the GFCM Working Group on Fishing technologies (WGFIT) *"The MEDAC [...] 4) Emphasizes the importance of enforcement and compliance with Recommendations by all the contracting parties of the GFCM, by reinforcing the activity of the Compliance Committee of GFCM in order to identify cases of non-compliance and the appropriate measures to deter and stop non-compliance; 5) The adoption of any further new gear or fishing technology aimed at increasing selectivity, should be supported by Contracting Parties' financial funds."* [LINK](#)

Q22. To what extent (1 to 5) are RFMOs well equipped to face the challenges of climate change and protection of ecosystems, pollution, alien species, etc.? Rating (1-5): 1. Not at all; 2. Poorly; 3. Moderately; 4. Incompletely; 5. Fully



Q25. Can you share examples of good practices or projects supported by the EMFF or that could be supported by the EMFAF to help achieve the objectives of the European Green Deal – ‘fit for 55 delivering EU’s 2030 climate targets’?

- Technical projects should be developed for the effective implementation of green energy engines and their standardized use. **EMPA (SPAIN 60%)**
- Any of the many studies produced by the Scientific Institutes. More support is needed as they often opt for support from the Structural Fund to carry out studies of various kinds, relating to the resource and fishing activity, but they are not "selected". **UNACOMAR (SPAIN 60%)**
- Engine replacement from fuel to methane/hydrogen. **Federpesca (Italy 60%)**

- Some best practices supported by EMFAF measures 1.26 “Innovation” and 1.40 “Protection and restoration of biodiversity and marine ecosystems and compensation schemes under sustainable fisheries”. **Unci Agroalimentare - AGCI Agrital – Federcoopesca - Legacoop (Italy 60%)**
- Support the collection of waste collected at sea and its delivery to land; reduce fuel consumption at sea by increasing the use of hybrid electrical installations. **Coldiretti (Italy 60%)**
- Financing of the flying doors in the trawls (reduce diesel consumption by 30%, and reduce contact with the seabed), through the production plans of the PPOs or through specific direct calls. **CEPESCA (SPAIN 60%)**

Q26. How do you see the role of public investment encouraging innovation and strengthening resilience in fisheries and aquaculture, in particular at local level?

- Not possible in needed extent. **ZZRS (Slovenia 60%)**
- Strengthening the FLAG role. **Federpesca (Italy 60%)**
- Any investment is important if shared with the professional sector to provide more relevant information to research and to the measures to be taken. **FNCP (SPAIN 60%)**
- Through processing and marketing of fish products and the use of the latest generation of hybrid engines on board. **Coldiretti (Italy 60%)**
- Without public investment, the required innovation is not possible. **EMPA (SPAIN 60%) – UNACOMAR (SPAIN 60%) – CNPMM French fishery sector**
- Some positive examples are carried out by enforcing the measure 2.47. **AGCI Agrital – Federcoopesca - Legacoop (Italy 60%)**
- Certain types of energy should not be excluded from the framework of the delegated act implementing the replacement of engine measure of the EMFAF. More flexibility is needed and small enterprises should be supported in order to access to EC funds. **CNPMM French fishery sector**
- Improve the generational turnover motivating young people, since they are the key to make the transition to a more technological, innovative, digitized fishing. **CEPESCA (SPAIN 60%)**
- The fish in our seas belong to all of us, and resilient fisheries benefit all: the fish, the fishers and communities depending on it, and society at large. To ensure fairness between business and society, it must be ensured that public investment facilitates innovation and resilience in fisheries, in promoting low-impact and sustainable practices. This for instance calls for harmful fisheries subsidies, such as the EU fuel detaxation scheme, which support destructive and/or carbon intensive fishing activities, to be eliminated. Public subsidies must be redirected towards beneficial actions: for instance, supporting fishers in their transition towards low-impact fishing. **WWF (40%)**
- The new EMFAF, adopted in July 2021, does not sufficiently address the 21st century challenges to tackle the climate and biodiversity crises. Member States have the opportunity to turn this tide by developing and implementing FAIR operational EMFAF programmes for the next 7 years: Fair, Ambitious, Innovative and Revitalising for fisheries and the marine environment. MS need to favour transition towards low-impact fisheries, along with better protection and restoration of marine resources, instead of providing harmful subsidies to fossil-fuel intensive industrial fisheries. The MS and the European Commission should make greater use of their responsibility to assess and approve

the EMFAF programmes to ensure that environmental objectives are fully included, in line with the 2030 European Biodiversity Strategy and EU Green Deal. **WWF (40%)**

- Innovation in 2021-2027 means aiming to restore and protect the resources that underpin economic activity at sea, including fisheries, while supporting the fisheries sector to transition towards more sustainable and low impact fisheries and become economically viable without constant public support. Many reports highlight the current lack of such type of innovation. In a joint NGO briefing on EMFAF (2021), NGOs laid out 15 recommendations for Member States to improve their environmental commitments through their EMFAF operational programmes **WWF (40%)**

Q27. Can you suggest projects that the EMFAF could support to facilitate generational renewal in the fishing and aquaculture sector?

On fishery only **Ref 295/2021 MEDAC contribution on EMFAF Strategies "[...] 3. Improvement of the generational turnover. Proposed actions:**

a. The payment of a premium and by encouraging, through the provision of financial resources, the establishment and development of competitive, environmentally friendly and integrated coastal enterprises. Such as the activation of an integrated business package (Youth Package) consisting of different measures of the EMFAF Programme coordinated with each other by a business plan. In addition to the startup premium, the package should support the investments to improve the sustainability and the activities of the enterprise and the investments for the development of the activities diversification in the blue economy framework.

b. By providing for a first location premium as in agriculture where a non-repayable premium is granted. The amount varies according to the areas (intensive areas/inland areas) from 40.000 to 60.000 euros with the constraint to carry out the activity for at least five years." [LINK](#)

Open Text Q28a. In what way do you see the synergies between the different human activities at sea, specifically between those activities falling under the CFP Regulation and the Maritime Spatial Planning Directive?

Ref.295/2021 Object: MEDAC contribution on EMFAF Strategies "[...] 4. Investments for the creation and development of diversification of business activity.

a. Conversion of fleet segments insisting on overexploited resources (or stocks) to other fisheries targeting less exploited species. For this reason, special (traditional) 4. Investments for the creation and development of diversification of business activity.

b. Conversion of fleet segments insisting on overexploited resources (or stocks) to other fisheries targeting less exploited species. For this reason, special (traditional)" [LINK](#)

28b. Does the current EU legislation framework encourages such synergies to take place?

- **Answer: Yes**

It is work in progress in the framework of the EU Green Deal (and MEDAC WG3 Green Deal as a direct effect)

Q29. Is the current legislative framework sufficient to ensure that maritime space is used in such a way that helps achieve the objectives of the European Green Deal (e.g. sustainable seafood, sustainable energy, nature conservation and restoration)?

Ref. 351/2020 Multi-AC advice on the “Maritime sector – a green post-COVID future” Roadmap *"The seafood sector has continually worked on improving its sustainability performance with a multitude of initiatives and improvements implemented over the years, including improved fisheries management at sea, more efficient and effective aquaculture practices, as well as increased resource efficiency in seafood processing. The sector is highly regulated, and its members persistently strive to address the balance between the three pillars of sustainability through individual, national or trans-national initiatives."* [LINK](#)

Q30. What kind of impact have you experienced as a result of spatial planning initiatives or other human activities? Multiple choice (Single answer) Positive/Negative/I do not know



Q31. What is the impact of pollution on the fishing community?

- Medium high. ZZRS (Slovenia 60%)
- Great. It is one of the main causes of the little recovery of fishing stocks and it has a strong impact on the environment. EMPA (SPAIN 60%) – Federpesca (Italy 60%) – Unci Agroalimentare - FNCP (SPAIN 60%) Plastic pollution especially has negative impacts on gears and vessels. Unci Agroalimentare - CEPESCA (SPAIN 60%)
- Modification of population dynamics of marine species, quality of waters and tourism. Coldiretti (Italy 60%)
- Pollution (eutrophication, contaminants, underwater noise, acidification or macrowaste) directly or indirectly impacts the species of commercial interest by the disturbance of the first links in the food chain, the migration of populations, loss of functional habitats, physiological changes caused by increased CO2 partial pressure and temperature, and many other impacts. Macrowaste is also a real safety issue for professional fishermen, especially regarding passive fishing or the risk of collisions

with containers. These multiple disruptions to the fisheries resource are, in professional opinion, directly resulting in costs and losses due, for example, to travel longer distances in order to hope to find the target species. **CNPMEM French fishery sector**

- Finally, achieving good ecological status at sea will only be possible if it is achieved for continental waters through the Water Framework Directive. Indeed, the pollution present in the transition waters has a significant impact on the fauna present, and in particular on the European eel. Contaminants such as PCBs, pesticides, heavy metals, brominated derivatives and dioxins will have physiological impacts at various levels (tissue damage, stress, disruption of osmoregulation, behaviour modification, hormonal alterations). These changes will have a direct impact on the reproduction rate of eels and therefore their biomass, bearing in mind that the management of eels is a major current issue in estuarine fisheries. **CNPMEM French fishery sector**

- Macrowaste is a major and growing problem at sea, especially in areas where the sharing of space is very important. Interactions between different activities and fishing gear are often costly in terms of time and equipment for fishermen who see waste from other anthropogenic activities at sea or on land in their nets.

- Plastic pollution is one of the sources of degradation of the marine environment and therefore has a direct and indirect impact on fishing activities. **CNPMEM French fishery sector**

- A significant problem remains the incidental encounter with containers lost at sea, which constitute, in addition to significant pollution, a significant safety risk for fishing professionals. Statistics point to the loss of 5,000 containers a year at sea, and it should be remembered that the most dangerous cargo is usually placed on deck. For fishermen, the greatest risk is that of collision, especially at night or when the container floats between two waters. Trawlers can also catch a container in their gear and the size of the container or trawl can be a major accident factor. It should be noted that a report by the Parliamentary Office for the Evaluation of Scientific and Technological Choices of 2020 recommends that all containers carrying pellets or plastics be geolocated. **CNPMEM French fishery sector**

Q32. How do the fishing community work on to protect oceans (from pollution)?

- A little, collection of garbage and nets. **ZZRS (Slovenia 60%)**

- Every day fishers are collecting garbage from the sea and land it on the coast. **EMPA (SPAIN 60%) – UNACOMAR (SPAIN 60%) – Federpesca (Italy 60%) – Uinci Agroalimentare - Coldiretti (Italy 60%) – CEPESCA (SPAIN 60%) - FNCP (SPAIN 60%)** This has been well shown in various projects, such as <https://pescaneta.com>. **UNACOMAR (SPAIN 60%) - CEPESCA (SPAIN 60%)**

- Avoiding the fishing gears loss. **Uinci Agroalimentare**

- Reduction of engine emissions and using innovative technologies such as those adopted on land and maritime transports. **Coldiretti (Italy 60%)**

- Promotion of good environmental practices by changing packaging from porex to reused plastic or cardboard packaging. **CEPESCA (SPAIN 60%)**

- Since many years, the French fishing industry has been aware of the importance of marine pollution. To do this, she conducted a diagnostic study to better understand the management and deposit of used fishing gear (PECHPROP, PECHPROP 2, RECYPECH, etc.). It also supports organizations that develop gear recycling solutions (Fil&Fab, Intermas, Noostrim, etc.). In addition, the sector actively participates in experimental approaches related to the eco-design of fishing gear so that they are

biodegradable and/or bio-based (FIBIO, TEFIBIO, INDIGO, FILALTIQ, etc.) and that the end-of-life of these products be managed through industrial composting. The profession has also participated in «fishing for litter» activities in a passive way (WFO-France Macro-déchets, ReSeaclons) and contributes to new approaches in this direction (Upcycling The Ocean). **CNPMEM French fishery sector**

- The maritime sector works in many areas to preserve this fragile space. For example, one of the axes of the THOMSEA project uses the know-how of professional fishermen to collect floating macro-litter using a special trawl. Fishermen also play a “warning” role in the event of pollution by working in contact with the marine environment on a daily basis and by being involved in protecting the environments on which they depend economically. The existence of structures such as the fisheries committees and the many working committees within them which deal with the major issues of protecting the good health of ecosystems is a sign of the profession’s overall commitment. The participation of professional representatives in national environmental policy bodies also shows the strong involvement of the sector on these issues. Finally, the sector wishes to recall its great involvement in the implementation of the Birds and Habitats Directives and Strategic Framework Directive for the Marine Environment through active participation in the drafting of the objective documents, the animation of sites via the role of Natura 2000 area manager (such as that of the Rochebonne plateau, managed by the CNPMEM), or the conduct of Risk Analysis Fisheries at the national level. **CNPMEM French fishery sector**

Q33. What further initiatives and actions could be taken, within the CFP's current legal framework, to support the objectives of ensuring clean oceans within fisheries management? Do you have any examples of good practice?

Ref. 351/2020 Multi-AC advice on the “Maritime sector – a green post-COVID future” *Conclusions - The seafood sector has continually worked on improving its sustainability performance with a multitude of initiatives and improvements implemented over the years, including improved fisheries management at sea, more efficient and effective aquaculture practices, as well as increased resource efficiency in seafood processing. The sector is highly regulated, and its members persistently strive to address the balance between the three pillars of sustainability through individual, national or trans-national initiatives.*

Though seafood has a lower carbon footprint on average compared to land-based animal protein production, and the sector has been steadily decreasing its CO2 emissions for at least the past 10 years, the sector recognises the importance of continual improvement regarding its environmental performance - in order to fully transition to more sustainable and low impact seafood systems - and is committed to ensuring the long-term sustainable performance of the sector. This will also allow to safeguard its contribution to a healthy marine environment, nutritious food production, and resilient coastal communities, which is also true for the recreational sector.

When looking at EU seafood imports, several cases of human rights violations can be highlighted, including the violations of labour rights by some industrial fishing fleets that supply fish for the EU market, or the imports of fishmeal and fish oil from West Africa that threaten the right to food of African populations. As the EU market is the most important and lucrative market for fish products globally, a future legislation that would ensure products placed on the EU market are free from human

rights violations in their supply chains, as suggested by the Farm to Fork Strategy, would be an opportunity to address these concerns in the EU, but also to lead the way in global fisheries. At the same time, it is important that the environmental sustainability of imported products is ensured in the interest of EU consumers and to guarantee a level-playing field for the EU seafood sector 16, in accordance with the current EU control, import and trade measures in force". [LINK](#)

Ref. 178/2020 Multi-AC Advice on the implementation of the Single Use Plastics Directive and operational aspects of the Fishing for Litter Scheme "Advisory Councils' advice on the harmonisation of Fishing for Litter schemes

1. All measures directed at the marine litter problem should be checked for cost-effectiveness. It is important to know how much money and how much effort and bureaucratic burden must be invested in order to solve the marine litter problem (which is not only a lost fishing gear problem).
2. Fishing for Litter schemes are simple and can be coordinated at local and regional level, as current examples show. The Commission should compile information and data on these in order to identify, share and promote best practice. This can encourage the uptake of FFL schemes in additional Member States, for example via a shared data base, the development of a step-by-step implementation guide or the organisation of a targeted EU workshop showcasing best-in-class practices.
3. Agreement must be reached in the harmonisation of the landing of FFL across European Member States into port facilities to streamline processes for all vessels regardless of their country of origin and taking into account the provisions of Art. 8 (2d) of the Port Reception Facilities Directive (EU) 2019/88321 regardless of port of origin or size of vessel
4. Member States shall ensure that all ports providing port reception facilities for fishing vessels establish fishing-for-litter initiatives to encourage the collection and measurement of passively fished waste from normal fishing activities.
5. Such schemes should be set up in accordance with the guidelines laid out in OSPAR Recommendation 2016/1 on the reduction of marine litter through the implementation of fishing for litter initiatives.
6. Member States shall establish and maintain a managed national fund via the EMFF or other relevant funding streams to support the collection of passively fished waste from fishing vessels. The fund must be used to ensure the functioning of fishing-for-litter initiatives, including the provision of suitable on-board waste storage facilities, the monitoring of passively fished waste, education and promotion of voluntary participation in the initiative, costs of waste treatment and to cover the costs of personnel required for the functioning of such schemes and to accommodate the long lifecycle of fishing gear. This funding must be available to all ports and piers regardless of their management structure.
7. A fund shall be established at the Union level to support projects, programmes and schemes to collect passively fished waste from fishing vessels and waste found on coastlines in the vicinity of ports and along shipping routes.
8. Ships calling on a port in a Member State shall contribute to this fund a fixed contribution, differentiated with respect to the category and size of the ship and the type of traffic the ship is engaged in, for each port of call.
9. The Commission shall be empowered, by means of implementing acts adopted in accordance with the examination procedure referred to in Article 20(2) of the PRF Directive, to establish the modalities for collection, management and distribution of the fund.

10. Identify, promote and share best practice for fishing vessels of the different methods of fishing operations currently underway in the various Member States with industry. These should feed into the criteria for the definition of “green ships” as mentioned in Annex 4 of the PRF Directive.
11. Carry out an evaluation of the social and economic contribution from FFL fishermen to Europe by their participation in cleaning our oceans of marine plastic litter and linked to the economic impact plastic pollution in the marine environment has on the seafood sector.
12. Carry out an independent evaluation of the voluntary social contribution of NWW fishing fleet’s participation in FFL to mitigate any financial burden they may face in the purchase of the dual purpose fishing gear they operate.
13. Communication and coordination at local, national and sea-basin level to ensure an integrated approach between Member States which enables fishing vessels to land Fishing for Litter material in any port, also counting on support by EU decentralized agencies.
14. An annual report should be produced on the quantity (possibly recyclability i.e. a breakdown of constituent material, including volume, materials, type of objects) of marine litter being landed in the ports through the FFL scheme as a tangible measure of decreasing amounts of litter reaching the marine environment.
15. An annual map of the quantities of plastic waste collected in the FFL program associated with river basins would make it possible to have information on the origin of the plastics captured, and therefore to be able to act at the origin, reinforcing the campaigns selective collection. This should be linked to existing mapping efforts, for example EMODnet and Project CleanAtlantic or expanding and granting public access to parts of the EMSA integrated maritime services platform (IMS).
16. Numerous projects are under way in various Member States in relation to monitoring, mapping, prevention and removal of marine litter. While some of these are funded and supported by the European Commission, others may be carried out by private entities. It is imperative that these studies and initiatives are identified and brought together on a single platform to enable knowledge transfer across all EU Member States and to avoid duplication of work and costs. This study should be coordinated at Commission level.
17. Work is underway in various Member States regarding the development of electronic applications to assist fishermen with recording data related to passively fished waste. The Advisory Councils recommend that available solutions be shared at a minimum on a sea-basin level so that harmonization can be achieved regarding the registration of passively fished marine waste.
18. In order to improve the management of fishing gear and fishing waste, it is crucial that all MS have good facilities for fishing waste reception and disposal. In addition, all MS should have functional funding schemes under the EMFF, dedicated to fishing for litter projects. Also, a better involvement of fishermen in future design of fishing gear and extensive raising awareness projects on the long-term impact of plastics are needed. Moreover, scientific studies on litter distribution, type of litter and abundance in the water column and sea-bottom (as requested by MSFD, Descriptor 10) will contribute to better assess the level of the impact.
19. Member States must ensure that data on the quantities of passively fished waste collected is collated and stored in a national or regional database for the purposes of monitoring and evaluation.

20. Member States shall inform the Commission on the establishment of their national funds by 31 December 2022 and shall submit annual reports every two years thereafter on the activities funded under Article 8(d) of the Port Receptions Facilities Directive.” [LINK](#)

Q34. What key social aspects should be taken into consideration when proposing/adopting fisheries management measures?

- All the management measures impacting on the fishing community should take into consideration the socioeconomic information before their implementation (**Federpesca (Italy 60%) – Uinci Agroalimentare - EMPA (SPAIN 60%) – CNPMEM French fishery sector – ZZRS (Slovenia 60%)**) and consequently apply the required socioeconomic support to prevent the negative effects. **EMPA (SPAIN 60%)** The income, the profitability of enterprises and preserving jobs are the key social aspects. **AGCI Agrital – Federcoopesca - Legacoop (Italy 60%) - FNCP (SPAIN 60%)**
- The social structure depending on the fishery sector should be considered. **Coldiretti (Italy 60%)**
- To encourage the generational turnover. **CEPESCA (SPAIN 60%)**
- Self-management and co-management initiatives. **AGCI Agrital – Federcoopesca - Legacoop (Italy 60%)**
- The social and economic reality of Mediterranean fisheries concerns family micro-enterprises, which generate wealth and employment in activities on land, multiplying exponentially, fixing population in depressed areas, allowing and supporting the existence of other activities in the same ports which had their origin and justification in the existence of a fishing activity, as is also the case with many stocks, that have their origin in the fishing activity. The fact that it is a food supply activity of the highest quality, and proximity, generating the lowest existing carbon footprint compared to other activities (including aquaculture), etc.etc.etc **UNACOMAR (SPAIN 60%)**
- One of the priorities of the forthcoming reform should be the development of a real social component of the CFP, In particular, the lack of harmonization of social norms, but also the difficulties to come from the point of view of generational renewal. Thus, it cannot be enough to «be satisfied» with the availability of Community funds to agree that such a component is currently being implemented. Finally, the path to improving the quality of impact assessments should also be able to reinforce the social dimension when a regulation is proposed by the European Commission. In line with the theme of governance, this issue of strengthening impact studies should be a key point for improving the relationship with the European Commission. The role of the Social Dialogue Committee and its low impact in the current process has been put forward and should be considered in depth so as to allow for possible developments. **CNPMEM French fishery sector**
- The European Green Deal paves the way towards a new approach for combining economic, social and ecological aspects for the sustainable development of fisheries. Policy makers and the fishing industry should abandon the narrow view of the marine environment as a continuous stock we can overexploit. Instead, they should acknowledge that ecological systems are the indispensable foundation of their existence. Healthy, resilient and productive marine ecosystems are crucial for their survival. Member States should prioritise the just transition to a fishing fleet that is commensurate with available fishing opportunities and operates with minimum environmental impact. The EC should guide this transition with the support of dedicated employment and social policy tools, e.g. through specific EMFAF funding and proper assessment of fishing opportunities. **WWF (40%)**

Q35. What initiatives should be taken to further strengthen the CFP's social dimension within its current legal framework?

- To strengthen the social dimension, the measures that unnecessarily destroy the business and labour fabric in fisheries should NOT continue to be adopted (for example, the brutal reduction in effort proposed by the Commission bodies). Deadlines for achieving MSY targets should be extended and real time should be allowed to evaluate the recovery measures already implemented. Otherwise, there will simply be no social dimension. **EMPA (SPAIN 60%)**

- Equality policies to motivate women. Aid for young fishermen to buy first vessel should be less restrictive, more agile, etc **CEPESCA (SPAIN 60%)**

- Promoting traceability and labelling on fishery products to provide added value to the fisher's work and his community. Development of commercial activities, restaurants and maritime traditions. **Coldiretti (Italy 60%)**

- EC should enforce the provisions of CFP regulation, where socioeconomic measures are foreseen. Economic competitiveness must be supported, the tax reduction of fuel must be maintained as well as the social benefits in fisheries, rejecting the model of maximum economic performance that threatens employment, especially in small-scale fishing vessels. **FNCP (SPAIN 60%)**

- Far-reaching changes in regulations are needed, but above all, changes in the obtuse mentality that show the ill-designed policies that have been applied for years, loaded with false prejudices against a secular profession. It's getting late. It shouldn't be forgotten that it's easy to destroy boats and leave crews on land, without work. This productive structure, once lost, is impossible to recover. Our consumers and the resource are being put in the hands of fleets and professionals who do not have the fishing culture that characterises Europe, and who do not have a legislative acquis such as the Community, nor the control mechanisms (beyond "control") that the EU has acquired. A change of direction is necessary. . We cannot continue to squander human capital as important as that of our seafarers. **UNACOMAR (SPAIN 60%)**

- Certain socio-economic considerations remain often overlooked, while (aggregated) data and information on the socio-economic impact of the CFP remain deficient. As indicated in this report, the tremendous scope of socio-economic issues requires a multidisciplinary research approach in order to inform the implementation of the CFP and advance new policies. This research effort must work closely with stakeholders in the fishing sector to understand the leading dynamics that explain current socio-economic performance, as well as the barriers to and opportunities for improvement. Given the need for stock recovery to meet the objectives of the Common Fisheries Policy, establishing a better understanding of how socio-economic performance interacts with environmental sustainability is essential. The aforementioned report contributes to a framework for evaluating socio-economic performance, and provides a preliminary analysis in the key areas of profit, fairness, employment, remuneration and compliance, which includes a series of recommendations.

The EU legal framework is also lacking sufficiently high standards that promote safety and good working conditions for fishers, training, and responsible fishing operations. For instance, only a few Member States have ratified the IMO Cape Town Agreement on Fishing Vessel Safety, despite the well-known dangerous nature of capture fisheries. **WWF (40%)**

Q36. What challenge(s) do you face or are you aware of in relation to climate change in EU fisheries?

Ref. 70/2021 MEDAC ADVICE ON CLIMATE CHANGE

"[...] - To enforce effective monitoring, control and surveillance.

Ultimately, sustainability comes down to optimal resource management – if fishery regulations are absent or ignored, controlling what goes on there is impossible. Permits, seasonal closures, fishing opportunities, protected areas – all can contribute to sustainable management. Control bodies should be reinforced with tools and resources they need, and the culture of compliance should be endorsed and promoted by the fishers themselves.

- Adaptive management

By definition, climate change implies a situation that is constantly evolving, and fisheries management needs to keep pace to ensure adaptive measures remain appropriate and effective.

Therefore, it is necessary to:

o Promote greater consideration of adaptation to climate change in the guidelines and integrated community policies (in particular the Common Fisheries Policy),

o Consider alternative management approaches (e.g., changing from effort limits to catch limits to adjust exploitation rates when catch potential is unstable),

o Promote innovation and the adaptation of fishing vessels (safety, habitability and respect of the environment) considering the need of the fishing fleets to explore new fishing grounds adapting to movements and migrations of certain species in response to climate change (often towards offshore areas) balancing fishing capacity with the status of target stocks.

o To take into account the distribution of fish stock in response to climate change in managing marine resources.

- Co-management

Fishers rightly place great importance on participatory management structures, which could be implemented via multi-stakeholder management committees at fishery and regional levels. As well as making the active support of local fishers much more likely, such structures benefit from their unique knowledge and observations of what's really going on in the water – this perspective is an invaluable complement to the fine-grained scientific projections and analysis.

- Precautionary targets and an ecosystem-based approach The increasing risks that climate change determine, can be mitigated with an ecosystem-based approach to fisheries management that supports a broader ecosystem resilience. Selectivity is, for example, a tool to reduce unwanted catches.

- Research development Some effects have been highlighted such as for example the changes in species composition and abundance, emergence of invasive species, food web modifications or impact on water resources.

However, effects of complex climate changes on fish stocks and their consequences on fisheries need to be deepened.

About fisheries adaptation, planning based on alternative scenarios that integrates knowledge from all stakeholders is needed – and the range of potential outcomes to plan for, must integrate social factors as well as climatic and fishery science. This is another area where the role of women should be highlighted, as a driver of efficiency and sustainability.” [LINK](#)

Q37. What are the possible solutions for fisheries to adapt to the changing environment, including in terms diversifying activities? Are there any good practices/ innovations that could help you overcome the challenges you mentioned above?

Ref. 70/2021 MEDAC ADVICE ON CLIMATE CHANGE "- *The Commission and the Member States to provide for appropriate support measures, such as insurance regimes and social protection systems for the groups that are the most exposed to climate change.*

- *The Commission and the Member States to deepen knowledge: 1. on the impacts of climate change, now and in the future, to anticipate measures to adapt to change, as well as 2. on the adaptation of fisheries,*

- *The Commission and the Member States to incorporate flexibility and adaptation in fisheries laws, regulation, and enforcement to allow fishing sector to adapt,*

- *The Commission and the Member States to support the adaptation of the downstream sector, including consumers, to promote new species favoured by climate change.” [LINK](#)*

Q38. How can the fisheries sector further reduce their emissions? Are there any good practices/innovations that could help you overcome the challenges related to climate change?

- Higher incentives and support in engine change. ZZRS (Slovenia 60%) - AGCI Agrital – Federcoopescas - Legacoop (Italy 60%) - FNCP (SPAIN 60%)

- Replacement of previous engines with the latest generation of hybrid engines. Coldiretti (Italy 60%)
Trawlers using the flying door system. All vessels with fuel polarizers. There should be widespread support for these systems. CEPESCA (SPAIN 60%)

- Today there are already green and renewable energies. Development studies and projects must be promoted and expedited in order to obtain the technology necessary for their effective implementation on fishing vessels. Once this technology has been achieved, the different European funds should provide incentives for the targets of 0 CO2 emissions in the fleet. EMPA (SPAIN 60%)

To further reduce their emissions (although Fisheries is the food-producing activity that generates the lowest carbon footprint), public support is needed. Short-term policies are useless. The Multiannual Plan for demersal species for the western Mediterranean is yet another example of the short-term policy which the European Commission has been imposing. Serious mistakes are being made which are damaging the fishing industry and our consumers. The Fisheries Sector needs support, not inquisitors. He has always been concerned about the resource and the environment, and fishermen are the first to want their descendants to be able to continue living from fishing. Most sustainable policies have been born by the initiative of Fishermen, such as temporary closures, space-time closures, reductions in hours of fishing day, etc. The Sector has always sought the support of the responsible Administrations, and the collaboration of scientific teams. UNACOMAR (SPAIN 60%)

- It would be useful to carry out a transparent scientific evaluation of the technical solutions available and under study, to reduce the carbon cost of vessels, fishing techniques and port facilities, to:
 - quantify their cumulative forecast contribution to the 2050 carbon neutrality commitment with regard to the availability of developing low-carbon energy sources and their necessary sharing between the various sectors of activity;
 - open a wide-ranging consultation between all stakeholders to examine these solutions and their financing arrangements, in particular those ensuring the compensation of the phasing out of the TICPE exemption;
 - intensify R&D work on those that are most efficient. This work, supported by European funds to adapt European fishing vessels, must also be part of the Green Deal's ambition. It would be more useful to intensify efforts on the production and deployment of port technologies and infrastructure than to constrain in the short term this sector, which remains marginal in terms of greenhouse gas emissions compared to other industries.

- planning the organisational measures necessary to achieve carbon neutrality.

However, it should be recalled that the capacity framework was originally designed to provide an overall framework for the development of capacity that is expected to reflect fishing capacity, not GHG emissions from fishing vessels. It is therefore not possible today for a shipowner to replace a vessel that is often older by a larger vessel but with an equal storage capacity, i.e. "fishing capacity", which prevents any possibility of an intermediate evolution towards other fuels.

Progress should also be made on materials used to build boats by promoting the recycling of reusable parts of old boats and the construction of "ships of the future" or eventually banning non-recyclable synthetic materials.

Both vessels and ports have an important role to play on climate change, in his sense, it is important for ports to ensure that:

- adapt them to rising sea levels caused by climate change and to the increasing risks of storms;
- facilitate access and disembarkation operations for new generation vessels;
- reduce their carbon impacts and improve waste management and recycling;
- improving the safety of seafarers.

Nevertheless, ensuring a complete energy transition of the fisheries sector in Europe requires that the Commission's strategy for a blue economy can accompany the sector in this transition in view of the very advanced average age of European fishing vessels. **CNPMEM French fishery sector**

- The EU should work to decarbonise fishing related activities towards net zero, from the extraction of fish to the distribution and commercialization of fish products. There is a need to better understand inefficient structures (from a carbon footprint & GHG point of view) and implement corrective measures. The fishing industry must contribute to the EU climate objectives and should not be left aside.

Other opportunities for addressing the climate impact of the EU fishing fleet include:

- Transitioning to low impact, generally passive forms of fishing (and away from high impact, bottom contacting mobile gears, which have a high GHG footprint).
- Removing harmful fisheries subsidies that incentivise energy intensive, high impact fishing methods.
- Removing fuel subsidies specifically, and in particular the tax exemption for fuel used by fishing vessels in the context of the revision of the Energy Taxation Directive.

- Allocating fishing opportunities based on sustainability criteria, including environmental criteria such as carbon footprint per unit of catch, and impact on blue carbon habitats and other marine carbon stores (including marine sediments).

The EC should develop a robust scientific assessment process that evaluates the impact of fishing activity on the carbon sequestration potential of fish populations and of the seabed/habitat, and reviews fuel consumption and CO2 emissions from EU fishing fleets.

The EC should provide guidance to Member States on criteria and a rating process that can assist in transitioning European fleets to low impact fishing by allocating quota to fleet segments that are low carbon emitters, have no impact on the seabed and avoid bycatch of sensitive species. **WWF (40%)**

Q39. What initiatives should be taken to further strengthen the CFP's climate dimension within its current legal framework?

Ref. 70/2021 MEDAC ADVICE ON CLIMATE CHANGE "- *The Commission and the Member States to provide for appropriate support measures, such as insurance regimes and social protection systems for the groups that are the most exposed to climate change.*

- *The Commission and the Member States to incorporate flexibility and adaptation in fisheries laws, regulation, and enforcement to allow fishing sector to adapt,*

- *The Commission and the Member States to support the adaptation of the downstream sector, including consumers, to promote new species favoured by climate change."* [LINK](#)

Any further comment?

- Many, but only one: Do not take advantage of the Community Fisheries Policy to destroy the fishing fleet and its social basis (which they are achieving), creating euro sceptics (see Brexit) and destroying the food sovereignty of the European Union. **EMPA (SPAIN 60%)**

- The CFP has borne the worst fruit for many years. There is no point in continuing to make changes to it, merely trying to continue to reduce fishing capacity as a reaction to the resource trends. That's a big mistake. Ant time is running to be able to correct the direction, and avoid the disaster that is leading to EU Fisheries. **UNACOMAR (SPAIN 60%)**

- From the fishing sector of Almeria we want to express our major disappointment and pessimism about how the CFP is being implemented...we think that the biggest obstacle are the current leaders of DG Mare, which do not take into account the socioeconomic impact of the fisheries management measures that are being implemented, do not take into account the contribution of the fishing sector, and their objective is a scenario of "blue economy" activities which are attractive in a tourist brochure but which are not a reality for the local communities who live from fishing. In addition, the economic aid is very cumbersome and slow, the aid to the temporary stop of the fleet has not been charged by the crew and shipowner 2 years after having made them...not to forget that fishing is the only income received by these families, if it stops, there are no inputs for families... On the part of the Member States that must ensure that the CFP is followed, they are not applying Comanagement and measures are still being taken with the hierarchical approach... All this makes the scenario of fishing today bleak, little motivating for young people. **CEPESCA (SPAIN 60%)**



- To stress that the treaty requires promoting fishing activity, not weakening it or eliminating it. Local production must be protected against unfair competition from third countries which do not respect EU standards for the protection of the ecosystem and human rights. More support should be given to the Cofradias that contribute in an essential and sustainable way with their advice to implement control measures, which regulate production and marketing, preserving cultural values, and structuring coastal communications, and fight against over-exploitation, illegal fishing and poaching, helping the local producer of the SSF, coastal and artisanal, to collaborate in the food security, in the defense of the ecosystem and in the protection of the consumer. **FNCP (SPAIN 60%)**

