

Ref. 129/2024

Rome, 28 June 2024

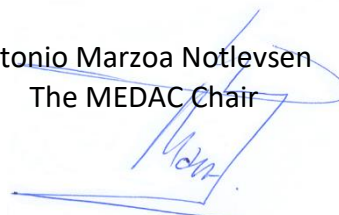
**MEDAC preamble to the Questionnaire: Study supporting the evaluation of the landing obligation – Common Fisheries Policy**

Referring to the questionnaire on the “Study supporting the evaluation of the landing obligation – Common Fisheries Policy”, the MEDAC can only reiterate what has already been stated the past years.

Please find attached the MEDAC email (ref.21/2021) and the MEDAC letter sent on 2020 (ref.21/2020, 29 January 2020).

The MEDAC started from the beginning the collaboration with both MSs and DG MARE in finding adaptive solutions through the JRs, and this process contributed to the draft of the current Delegated Regulations. Please find attached the letter sent by MEDAC on 24 October 2018 (Ref. 262/2018) to the MSs 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 have been provided. Furthermore, as confirmed by the delegated Reg. (EU) 2020/4, STECF concluded that *"due to the small quantities and the very large number of landing places [...], the evidence indicated that 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"*. This situation has not yet changed. However, acknowledging the important results of the multiannual collaboration, the MEDAC tried to fulfil the survey as much as possible on the online platform (the results of the questionnaire are also available in the annex), because the exemptions recognized by now avoided the strong socio-economic impact of the measure.

Antonio Marzoa Notlevsen  
The MEDAC Chair

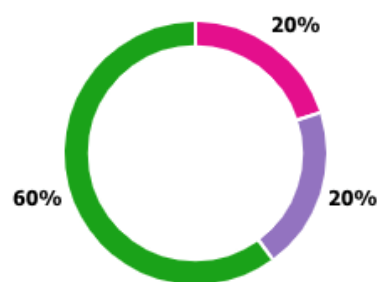


## ANNEX

### Section 1: Current state of play

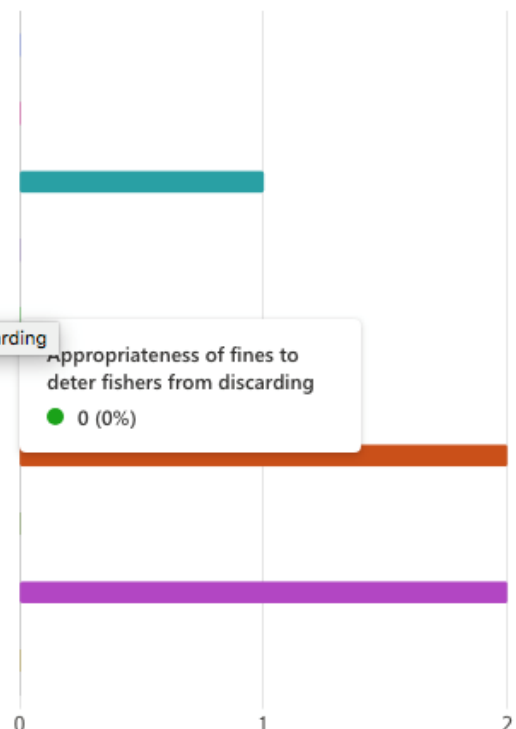
2. Please indicate what you believe are the levels of compliance with the following requirements of the landing obligation.

- That catches are brought and retained on board fishing vessels
- That catches are recorded
- That catches are landed
- That catches are counted against quota where applicable
- Are catches below the minimum conservation reference size restricted to purposes other than dire...



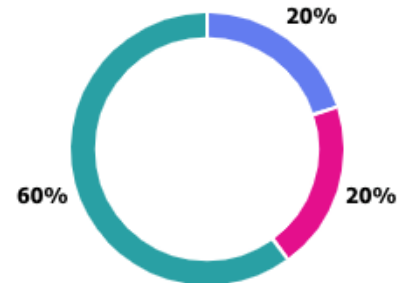
12. What challenges have you experienced in the implementation and in the control and enforcement of the landing obligation? - *Challenges related to control and enforcement*

- Difficult to detect discards because of insufficient observers (on board?)
- Difficult to detect discards because of insufficient electronic monitoring tools
- Not possible to detect discards by small (under-12m) vessels
- Difficult to gather evidence for successful prosecution of discarding
- Appropriateness of fines to deter fishers from discarding
- Not enough resources (inspectors, ships or aircraft) to enforce this obligation of landing all catches
- Lack of fisher understanding of the details of implementation and where different rules or...
- survivability exemptions;
- Inaccurate or lack of reporting on discards in logbooks
- Fish below MCRS are still being landed and marketed for purposes of direct human consumption



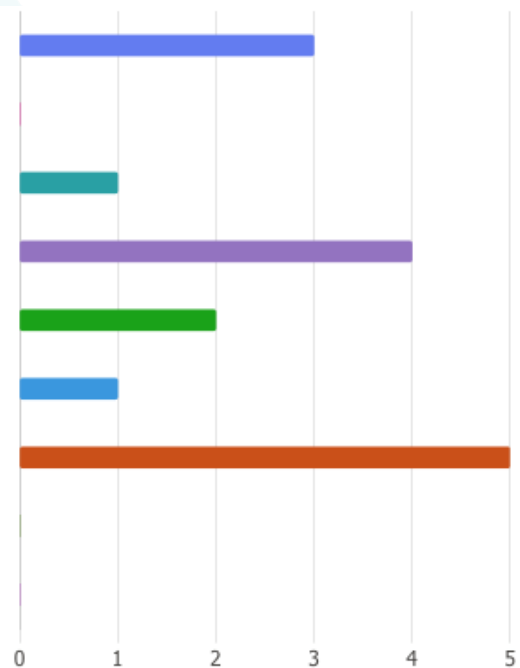
12. What challenges have you experienced in the implementation and in the control and enforcement of the landing obligation? - *Challenges related to quota management*

- Problems re-allocating quota to cover catches previously not landed
- Problems with the timing or availability of quota swaps
- Fisheries being forced to close early due to choke issues



12. What challenges have you experienced in the implementation and in the control and enforcement of the landing obligation? - *Operational challenges*

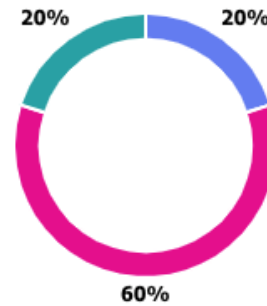
- Increased selectivity is hard to attain in specific fisheries (name the fisheries)
- Difficult to adapt vessels for handling unwanted catches at sea
- Insufficient hold capacity to accommodate additional unwanted catches
- Insufficient port infrastructure to handle additional landings of unwanted catches
- Difficulties with handling, storage and processing of unwanted catches at port
- Lack of national funding to support fishers to increase selectivity of fishing gear and methods or...
- Inexistence of economic outlet for unwanted catches brought to land
- Lack of incentives for compliance
- Others, please specify



## Section 2: Evaluation of Landing obligation

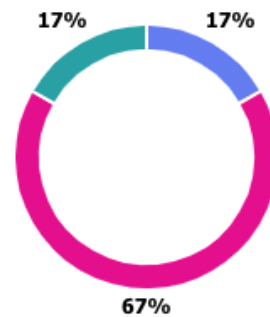
1. For the region(s), fleet segment(s) and fisheries in which you have an interest, to what extent would you estimate the landing obligation has contributed to the achievement of Article 2(5)(a)?!

- (a) gradually eliminate discards, on a case-by-case basis,;
- (b) by avoiding and reducing, as far as possible, unwanted catches;
- (c) gradually ensuring that all catches are landed



10. What do you perceive to be the barriers and challenges encountered regarding the handling of unwanted MCRS catches onboard vessels?

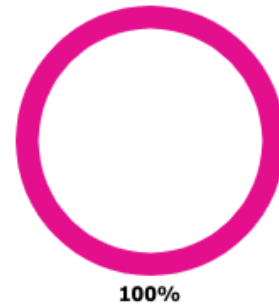
- (a) Difficulty in adapting vessels to manage the handling of unwanted catches at sea
- (b) Additional time and increased costs associated with the handling and processing of unwanted MC...
- (c) Insufficient hold capacity to accommodate additional unwanted MCRS catches



For the following statements indicate your opinion on one of the following responses (from **strongly disagree**, **disagree**, **agree**, **strongly agree** and **don't know**)

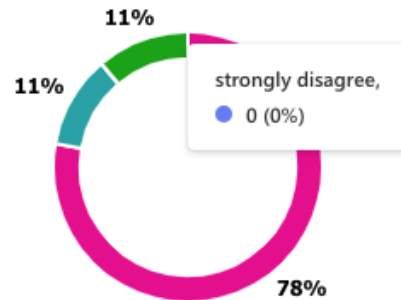
(a) The EU landing obligation to gradually eliminate all discards supported the national policies and initiatives that you listed above

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



(b) The EU landing obligation to reduce unwanted catches supported the national policies and initiatives that you listed above

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



(c) The EU landing obligation to ensure all catches are landed supported the national policies and initiatives that you listed above:

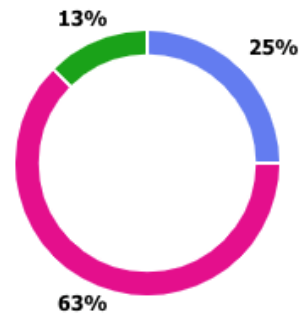
- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



24. For the following statements indicate your opinion on one of the following responses (from **strongly disagree, disagree, agree, strongly agree and don't know**) [ an EU intervention can be seen as any activities undertaken by the European Union (EU)],

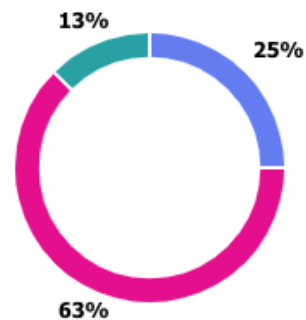
(a) the landing obligation resulted in additional value, compared to what could be achieved by Member States at national and regional levels?

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



(b) the landing obligation helped in the achieving results

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



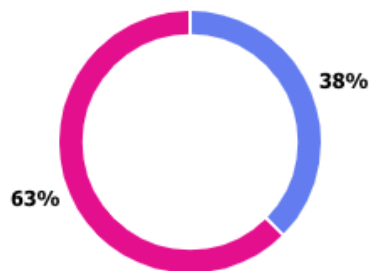
(c) the landing obligation provided additional results compared to the national and regional output and results in Member States

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



(d) the landing obligation responded to cope with crises:  
i. Climate emergencies, ii. COVID-19, iii. Russian aggression in Ukraine

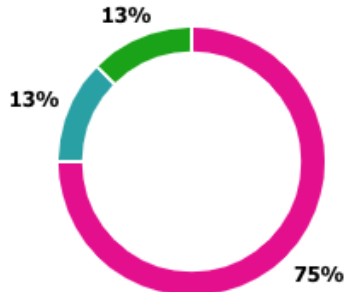
- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



**23.** For the following statements indicate your opinion on one of the following responses (from **strongly disagree, disagree, agree, strongly agree and don't know**)

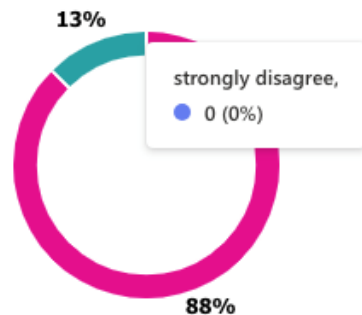
a. the objectives of the landing obligation help in protecting the marine environment (Marine Strategy Framework Directive),

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



b. The objectives of the landing obligation help in recovery of Biodiversity in the oceans (Biodiversity Strategy),

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



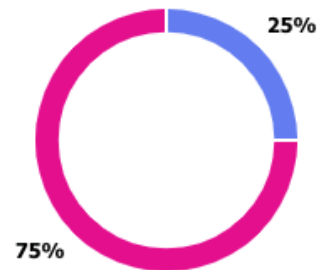
c. The objectives of the landing obligation help in maintaining and restoring the marine habitats to a favourable conservation status within the EU (Habitats Directive),

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



d. The objectives of the landing obligation help support fishers and improve productivity (Common Agricultural Policy)

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



e. The objectives of the landing obligation help tackle climate change and the sustainable management of natural resources (Common Agricultural Policy)

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know

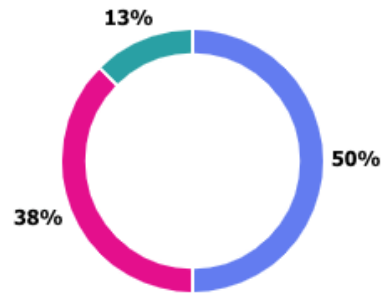




22. For the following statements indicate your opinion on one of the following responses (from **strongly disagree, disagree, agree, strongly agree and don't know**)

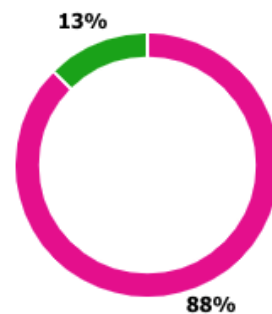
a. the landing obligation is relevant to the needs of your respective group as identified in the impact assessment of 2011 accompanying the Commission proposal

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



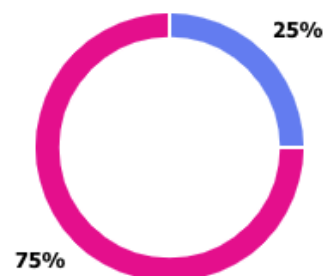
b. The landing obligation has improved the sustainable exploitation of marine resources

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



c. The landing obligation has a positive impact on the financial viability of fisheries

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



d. The landing obligation provides appropriate and proportionate exemptions in fishing quotas

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



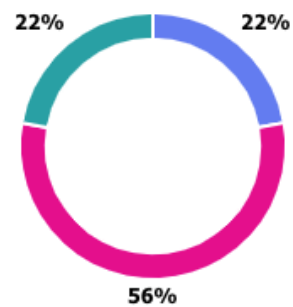
e. The landing obligation has reduced overall discard

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



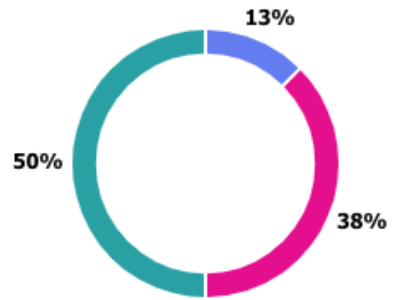
f. The landing obligation has increased the selectivity of fishing gear

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



g. The landing obligation has incentivised fishers to land all the catches

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know



h. Discards should continue to be eliminated

- strongly disagree,
- disagree
- agree
- strongly agree
- don't know

