



To:

EU Member States—Fisheries Attachés,

Members of European Parliament—Committee on Fisheries

CC: European Commission—Commissioner Vella and DG MARE

13th of June 2017

Subject: Environmental NGOs call for an ambitious and science-based multiannual management plan for small pelagic stocks in the Adriatic Sea

Dear Sir/Madam

The Mediterranean Sea is in deep crisis. Over 90% of assessed Mediterranean fish stocks are overexploited¹, while several sensitive species of seabirds, marine mammals and marine reptiles are incidentally caught². This has been known for years, but little has been done about it so far^{3,4,5,6}. The EU in particular is responsible for this

¹ Communication from the Commission to the European Parliament and the Council Consultation on the fishing opportunities for 2016 under the Common Fisheries Policy COM(2015) 239

² FAO, 2016. The State of Mediterranean and Black Sea Fisheries. General Fisheries Commission for the Mediterranean. Rome, Italy. 152pp.

³ Seminar "State of Fish Stocks in European Waters" Sep. 2012 (https://ec.europa.eu/fisheries/seminar-state-fish-stocks-european-waters_en)

bleak situation, being the main fishing actor in terms of catches, number of vessels and fleet capacity². The exploitation of Mediterranean fisheries resources exclusively under EU competence is on average three times higher than sustainable levels and there has been no sign in the past decade of any significant improvements in the exploitation regime³⁷.

This alarming state is the result of decades of fisheries mismanagement, misreporting, illegal fishing and ignoring scientific advice. A so-called “Mediterranean particularity” has been too long an excuse to neglect action, compromising the health of the fisheries resources and generating a discrepancy in management performance within the EU in relation to other areas such as the North East Atlantic. This irresponsible situation has to radically change now.

The first Mediterranean MAP—multiannual plan for small pelagic stocks in the Adriatic Sea⁸—should mark a milestone for a new, more efficient management regime. It is a starting point, but to be effective in recovering the targeted stocks it needs to adhere to the best available scientific advice. Anchovies and sardines in the Adriatic Sea are overexploited and the stocks are likely to decline further⁹. As advised by the Scientific, Technical and Economic Committee for Fisheries (STECF), pelagic fisheries in the Mediterranean qualify for an output control rule¹⁰.

Research has shown that the current system of technical measures has failed. In order to reduce excessive fishing mortality and ensure sustainable fisheries management of small pelagic fisheries, total allowable catches (TAC) must be introduced under the MAP with a clear recovery objective¹¹. Only in doing so, will Member States be able to accomplish the objectives the EU has agreed to and signed up to^{12,13}.

In order to make the Adriatic MAP a success and comply with the Common Fisheries Policy (CFP), we urge you to:

- Support an ambitious and science-based multiannual management plan.
- Introduce catch limits as the most effective management strategy for small pelagic stocks.

⁴ Seminar "State of Fish Stocks and Fisheries in European Waters" 2013 (https://ec.europa.eu/fisheries/seminar-state-fish-stocks-and-fisheries-european-waters_en)

⁵ Seminar "State of fish stocks and the economics of fishing fleets" 2014 (https://ec.europa.eu/fisheries/seminar-state-fish-stocks-and-economics-fishing-fleets_en)

⁶ Seminar "State of fish stocks and the economic performance of fishing fleets" 2015 (https://ec.europa.eu/fisheries/seminar-state-fish-stocks-and-economic-performance-fishing-fleets_en)

⁷ Cardinale M and Scarcella G (2017) Mediterranean Sea: A Failure of the European Fisheries Management System. *Front. Mar. Sci.* 4:72. doi: 10.3389/fmars.2017.00072

⁸ COM(2017)0097 Proposal for a Regulation of the European Parliament and of the Council establishing a multiannual plan for small pelagic stocks in the Adriatic Sea and the fisheries exploiting those stocks

⁹ Reports of the Scientific, Technical and Economic Committee for Fisheries (STECF) – 51st Plenary Meeting Report (PLEN-16-01). 2016. Publications Office of the European Union, Luxembourg, EUR 27758 EN, JRC 101442, 95pp.

¹⁰ Scientific, Technical and Economic Committee for Fisheries (STECF) – Small pelagic stocks in the Adriatic Sea. Mediterranean assessments part 1 (STECF-15-14). 2015. Publications Office of the European Union, Luxembourg, EUR 27492 EN, JRC 97707, 52 pp.

¹¹ Scientific, Technical and Economic Committee for Fisheries (STECF) – Small pelagic stocks in the Adriatic Sea. Mediterranean assessments part 1 (STECF-15-14). 2015. Publications Office of the European Union, Luxembourg, EUR 27492 EN, JRC 97707, 52 pp.

¹² http://www.unmillenniumproject.org/documents/131302_wssd_report_reissued.pdf

- Count all catches against the quotas in order to comply with the landing obligation (Art 15 of the CFP¹³).
- Include the ecosystem-based approach in fisheries management by:
 - providing incentives, such as fishing opportunities, to more selective fishing methods and low impact fisheries (Art. 7 of the CFP¹³);
 - identifying and establishing fish stock recovery areas (Art. 8 of the CFP¹³).
 - applying spatial measures to tackle incidental catches of seabirds, marine mammals and reptiles and financially committing to trial technical solutions for fishing gears to minimise these incidental catches, while also identifying the overlap of susceptible sensitive species with fishing gear and fishing effort.
- Allocate fishing opportunities using transparent and objective criteria and distribute them fairly at national level between the various fleet segments, prioritising low impact fisheries (Art.17 of the CFP¹³).
- Strengthen monitoring, enforcement and control of fishing activities.
- Improve data collection in the Adriatic and other Mediterranean sea basins.

We call on you to seize this opportunity to revert the dire situation in the Mediterranean Sea, prevent fish stocks from collapsing, and recover all EU stocks by 2020 at the very latest, thus fulfilling the legally binding obligation set by the CFP¹³. It is your duty to ensure that Mediterranean fish stocks are recovered, for the present and the future generations.

Yours faithfully,

Archipelagos Institute of Marine Conservation
 BIOM
 BirdLife Europe and Central Asia
 DOPPS - BirdLife Slovenia
 Legambiente
 LIPU
 MEDASSET-Mediterranean Association to Save the Sea Turtles
 MedReAct
 New Economics Foundation
 Oceana
 OceanCare
 Seas at Risk
 Sunce- Association for Nature, Environment and Sustainable Development
 VIVAMAR- Society for the Sustainable Development for the Sea
 WWF

¹³ Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC