Summary public consultation on small pelagic stocks in the Adriatic

- **Contributions received:** 15
- **Categories of contributors:**
  - Public authorities: 7
    - National: 5 (IT-HR-SI-ES-MT)
    - Local: 2 (Veneto & Marche)
  - Advisory Council: 1
  - Fishermen associations: 2 (1 from IT, 1 from HR)
  - NGOs: 2 (WWF & Birdlife)
  - Scientific bodies/Research Institutes: 2 (from HR)
  - Citizen: 1 (from IT)

- **Main comments received:**
  - Most contributors agreed on the Need for an EU multiannual plan, basically because the current legal framework does not allow to duly take into account the specificities of the region/fisheries and it does not allow to fully implement the CFP (regionalisation). However, the EU intervention should be limited to the orientation and determination of the objectives.
    - EU additional intervention should be aimed at recognising the specificities of the Adriatic and of small pelagic fisheries (Marche)
    - Current legal framework does not sufficiently recognise the specificities of the Adriatic fisheries from the technical and socio-economic point of view (Croatia)
    - EU multiannual plan for small pelagic would be a better solution (Croatia)
    - Current legislative framework needs a regulation, to implement the regionalisation (MEDAC)
    - EU intervention can only be limited to orientation and determination of objectives, leaving the identification of management measures to Member States (MEDAC)
- **Conservation and management approach:** target date for MSY 2020 (or even later – IT, CRO - , and it should be gradual). Interactions between fisheries and fleets and environmental factors should be taken into account. Measures should concern only target species, secondary target species possibly as a second step and/or LO is enough. Technical measures and additional measures on LO should be adopted via regionalisation and not in the plan. Technical measures should focus on spatio-temporal closures rather than on increase in selectivity based on mesh size. Plan has to be proportionate to the share of the different fleets (SLO).

  - EU plan should take into account interactions between fishing activities and the fact that in some cases the same fleet insist on small pelagic as well as on demersal (Marche);
  - Technical measures and landing obligation measures should be based on regionalisation (Croatia)
  - Achievement of MSY should be gradual (Croatia)
  - MSY by 2020 seems too close and it should not be brought forward, if anything, it should be postponed, albeit taking all possible precautions to prevent overfishing from continuing (MEDAC)
  - Target species are sardine and anchovy and management measures should be focused on those. For secondary species, only provisions of landing obligation should apply and are enough (Marche) (Slovenia) (Croatian Chamber of Economy) (CR-Advisory Service)
  - Sardine and anchovy are short living species, their biomass is largely affected with recruitment, which on its turn is driven by environmental conditions. New management models should incorporate this biological characteristics, as well as ecosystem based approach (CR-IOF)
  - Measures on secondary target species could be developed at a latest stage, when scientific basis are reinforced (CR-Advisory Service) (Croatia) (MEDAC)
  - Spatio-temporal closures, also on rotational basis (Marche); (MEDAC)
  - More attention to market mechanisms (Marche);
  - Target date for MSY should be 2020 (Marche) (Slovenia) (Croatian Chamber of Economy)
  - Exploitation coefficient (E) should be maintained as a proxy for Fmsy (Croatia)
  - Time frame has to be realistic (Croatia)
  - Co-management with fishermen organisation and scientific institutes (Marche)
  - Traditional fishing gears should be maintained (Slovenia)
  - EU plan has to be proportionate to the share of exploitation of different fleet (Slovenia)
  - Regionalisation should be ensured (Slovenia)

**TAC:**

  - Daily catch limits per vessels/fisherries (Marche) (IT);
  - TAC would be unacceptable (Slovenia) (Croatian Chamber of Economy) (CR-Advisory Service) (MEDAC)
  - TAC would increase discard (Croatia) (MEDAC)
- The multiannual plan should include the implementation of a catch limit system (Oceana)
- Technical measures are more appropriate than catch limits (Croatia)
- No new/different technical measures (Slovenia) (Croatian Chamber of Economy) (Croatia)
- Exemption from MEDREG provisions on drop of the net and depth for purse seines (Slovenia) (Croatian Chamber of Economy) (Croatia) (MEDAC)
- Adaptive management approach is recommended (Croatian Chamber of Economy) (CR-Advisory Service) (MEDAC)
- Plan should be in two phases: transition until 2017 (basically status quo, but improvement of scientific advice and monitoring) then evaluation and new measures from 2018-2020 (Croatian Chamber of Economy) (CR-Advisory Service) (MEDAC)
- Traffic light approach should be introduced (Croatian Chamber of Economy) (CR-Advisory Service)
- Management measures should include limited number of days, temporary cessation in spawning periods, closure of areas where smaller individuals aggregate (Croatian Chamber of Economy) (CR-Advisory Service)
- Environmental factors influence the biomass of sardine and anchovy, and should be taken into account (Croatian Chamber of Economy)
- Adaptive simultaneous management of sardine and anchovy based on reference directions rather than targets (CR-Advisory Service)
- Possible impact of minimum mesh size and revision of minimal landing size could be evaluated (CR-Advisory Service)
- The plan should foresee SSB based reference points: SSBpa and SSBlim (Croatia)
- The plan should foresee a regionalisation mechanism for the adoption of technical measures (Croatia)
- Traditional local fisheries must also be protected, such as "menaidi" (a kind of driftnet) in Trieste. They should be excluded from the scope of the plan (MEDAC) (IT)
- Introduction of "statistical grids" in the Adriatic larger than those identified by GFCM. This may allow for the introduction of a fishing effort management system with space-time closures and/or limitations, in exchange the fishermen would have freedom of choice concerning the fishing days, so they would be free to choose whether to go at sea or not depending on the markets, which would be managed where possible by the Producers Organisations (MEDAC)
- Extend the period in which anchovy and sardine fisheries are prohibited within the 6 mile limits (e.g. two months) (MEDAC)
- Regulation of the markets is also an issue. Management models focused on Producers Organisations should be promoted, including the adoption of production and commercialisation plans limiting the catches per vessel and per fishery, in order to reduce the overall fishing effort while increasing the profit of the single company. (ACI) (Veneto)
**Control:**

- EU should foresee mandatory fishing authorisations, VMS and logbook, but also foresee some exemptions from Control regulation (e.g. 4 hours pre-notification before arrival in port) (Slovenia) (ACI)

**Scientific issues:**

- Scientists have doubts on their own analysis, conclusions in GFMC-SAC and STECF are different (Croatian Chamber of Economy) (CR-Advisory Service) (CR-IOF) (MEDAC)
- Scientific basis should be improved (Croatian Chamber of Economy) (CR-IOF)
- Revision of input data and methodology for stock assessment is recommended (CR-IOF)
- Joint stock-assessment for GSA 17 and 18 is supported, but only in the future. For now differences in availability and reliability of data are too important (CR-IOF)
- Fishermen observations should complement scientific data (Croatian Chamber of Economy)
- EU plan should also foresee a system of notification of the status of resources, in which also fishermen have a role (Croatian Chamber of Economy)
- It is not acceptable that stock assessment is performed with data that are already 2 years old (Croatian Chamber of Economy) (CR-Advisory Service) (Croatia)
- Is the assessment method predominantly dependent on landing quantities? (CR-Advisory Service)
- Given the importance of environmental factors, is it realistic to expect that fishing mortality can regulate the spawning stock biomass in the long term? (CR-Advisory Service)
- Link between tuna presence in the Adriatic and tuna fattening farms and decrease of sardine (CR-Advisory Service)
- Catch independent methods should be used to strengthen scientific basis (CR-Advisory Service)
- The solution for acceptable stability of the small pelagic stocks is based on cohabitation of sardine and anchovy in the same ecosystem and alternative fluctuations in the biomass (CR-Advisory Service)
- The two target stocks are in competitive relation, therefore more scientific research is needed to determine whether both can be maintained at MSY level at the same time, and to determine the best ranges of reference points taking into account their mutual relation (Croatia)
- Additional (catch independent) stock assessment methods should be foreseen (CR-Advisory Service)
- Real time evaluations are recommended (CR-Advisory Service)
- Positive or negative changes to the stocks biomass originating from climatic deviation should be taken into account (Croatia)
- **Landing obligation:**
  - Risk of parallel black market for undersized (Marche)
  - Current discard plan provisions should be integrated (Slovenia) (MEDAC)
  - Landing obligation should be placed in the context of the management measures (e.g. if management measures increase discard, de minimis should be withdrawn and all catches landed) (CR-Advisory Service)
  - Co-management in landings control system especially when the catch is entirely transported to the site of the first sale (CR-Advisory Service)

- **Financial support:**
  - EMFF is critical but excessive bureaucracy and complex procedures are a problem (Marche);
  - Incentives mechanisms should be foreseen, also by producers organisations (Marche)
  - Temporary cessation is not enough to cover estimated economic losses (Slovenia)
  - Infrastructures should be promoted, in particular landing sites and ports, also to facilitate controls (Croatian Chamber of Economy)
  - Temporary cessation has an important role in socio-economic stabilisation of the fleet in those years where unwanted status of the stocks occurs (Croatia)
  - EMFF is the most important lever to speed up the process. (MEDAC) (ACI)
  - It would be desirable to see a reward system for access to the EMFF within the multiannual plan regulation, in particular the possibility of relaxing the rules on the inadmissibility of applications to the EMFF (derogation to 508/2014). (MEDAC) (ACI) (IT)

- **Other issues:**
  - Minimal impact on ecosystem, therefore it is not an issue (IT)
  - Co-management is the only way to reduce the administrative burden (IT)
  - Existing GFCM and EU framework started with full implementation only in 2015 and their effects are yet to be evaluated (Croatia)
  - Plan should be evaluated after 3 years (Croatia)
  - Co-management mechanisms, through fishermen organisations (Croatia)
  - Fisheries sector associations could be involved at advisory level to suggest how to streamline procedures (MEDAC)
  - Subsidiarity can be ensured only through strict cooperation with national and local authorities, fisheries organisations and scientific bodies. (Marche)
  - Information should be effectively promoted and distributed (MEDAC) (ACI)