

JOINT POSITION OF:

CNPMEM (Comitè National des Peches Maritimes et des Elevage Marins),

(France)

PEPMA (Panhellenic Union of Middle Range Fisheries)

(Greece)

AGCI Agrital, Fedagri Pesca, Legacoop Agroalimentare, UNCI Agroalimentare, Coldiretti Impresa Pesca, Federpesca,

(Italy)

CEPESCA (Confederacion Espanola de Pesca) **FNCP** (Federacion Nacional de Cofradias de Pescadores)

UNACOMAR (Union Nacional de Cooperativas del Mar de Espana)

(Spain)

HGK (Croatian Chamber of Economy) **Croatian Trawlers Coordination**

(Croatia)

ETF (European Transport Workers Federation)

The undersigned European Fisheries Organizations and Trade Unions of the Mediterranean Sea, representing almost all European Union companies operating in the basin, having regard to the "Marine Action Plan" included in the "Policy Package for more sustainable and resilient fisheries, aquaculture and marine ecosystem" presented on February 21st by V. Sinkevicius Commissioner for Environment, Oceans and Fisheries,

WHEREAS

the Action Plan:

- refers to the need for a short -term implementation of actions for a Fisheries and Ocean Pact;
- proposes **the immediate creation of a "bridge" between CFP and EU environmental policy**, the commitment to **legally protect 30% of our seas, of which a third strict protected**, is therefore taken up by the EU Biodiversity Strategy for 2030;
- proposes, for the seabed protection, the phasing out of mobile bottom fishing (which means trawling) on all existing and future Marine Protected Areas by 2030, with the adoption of national and joint recommendations FOR ALL NATURA 2000 SITES REFERRED TO IN THE HABITAT DIRECTIVE by March 2024;
- affirms, without mentioning the MPAs (or in any case closed to trawling) already existing in the Member States, the need to create new additional MPAs and of the extension of the trawling ban to any new MPAs which will be created and furthermore, the need **to protect the seabed even outside the MPAs;**

- announces possible further extensions of the fishing ban in the Mediterranean from the current 1000 m to 600-800 m bathymetric;
- affirms that the impacts of the Plan can lead to **structural changes** and can be offset by shifting fishing activities from the current ones to other areas;
- as regards the assessment of the socio-economic impact, it contains the now traditional generic argument that in the medium-long term the recovery of stocks due to the spill-over effect will enrich the fishing areas;
- on strengthening the knowledge base, it announces that studies on carbon storage capacity in different bottom habitats and the potential impacts of fishing on this capacity **will be launched**, and that **it will be necessary to improve** models to predict and evaluate the social, economic and environmental effects of current and future conservation measures, surprisingly, without planning them as the basis of the Plan it-self but instead for the future;
- concerning the Governance, on the one hand it states that the stakeholders work together through "regional groups" (?) and Advisory Councils, but it announces on the other hand that the Commission will create a "new joint special group for Member States, **with stakeholders as observers**", without mentioning the Advisory Councils, which are not even indicated in the different kind of stakeholders who can answer to the public consultation,
- concerning the public consultation, any draft text has been presented, but only questions have been made, moreover in these questions, it was not even specified that MPAs was meant the Natura 2000 areas.
- it does not in any way consider the need to implement the spatial planning referred to in the marine strategy

THE UNDERSIGNED ORGANIZATIONS EXPRESS THE FOLLOWING JOINT POSITION:

The European fisheries sector has been engaged for many years, working with DG Mare, in a tiring process of adaptation to the ever-changing European standards and for the achievement of the objectives of the CFP, as reformed in 2013, in particular as regards the achievement of MSY for all stocks. Good results have already been achieved for the northern European seas, while the Mediterranean is recording the first recovery results of several stocks, following the significant reduction in fishing effort established by the Regulation for demersal resources in the Western Mediterranean and by various GFCM recommendations with its management plans.

The Action Plan, that unifies the CFP with EU environmental policy (and which in fact turns out to be a cancellation of the CFP and its replacement with the environmental policy), for clearly political-electoral reasons sets short and very short-term objectives (2023-2024-2030). The EC seems to disregard the effectiveness of the actions developed up to now by the CFP, and therefore its own results.

The objective of phasing out the trawlers from all SCIs/Natura 2000 (in expansion), and which in the announced perspective will also concern areas outside the MPAs, clearly highlights the EC's willingness to ban from European seas the bottom trawling, directly affecting the sector which in Europe contributes 25% to the total landings of fish product and 38% of revenues, with 7,000 boats.

The demand that is not satisfied by the national product is obviously filled by the imported product, from countries where fishing does not comply with our own environmental, safety and work legislation. At the same time, reducing the production capacity of this activity in a context of international and economic crisis caused by Russia's military aggression against Ukraine, means jeopardizing the EU and its Member States food security and food autonomy, demonstrating a strategic myopia of EU's role.

The scientific assumptions of the Plan are arbitrary, highly questionable, and artfully chosen to support an entirely ideological theorem.

In the communication, the EC clearly admit that we do not have accurate scientific data, stating that “the lack of complete scientific information cannot justify postponing or failing to take necessary measures”. Measures to annually establish the possible reduction of the fishing effort in the Mediterranean should only rely on accurate and updated scientific data

The phasing out proposal put forward by the Plan does not offer room for adjustment and mediation, except for restricting and limiting the ban on trawling to clearly indicated and reasoned areas.

The application of the CFP in 2013 and its development through the application of regional plans, progressively reducing fishing days, adding space-time closures, has meant having to assume a significant commitment and sacrifice from the Mediterranean fishing sector, which has contributed to the improvement of stocks, a fact that has been scientifically evidenced.

On the other hand, the new control regulation in process will imply unprecedented monitoring and control of the fishing activity.

The creation of marine protected areas that have been implemented to date, prohibits trawling, which has implied an additional reduction and prior to the reduction of fishing days and that in many territories implies a reduction of more than 20% of the areas fishing, as is the case of the Balearic Islands.

As the action plan has been drafted, setting objectives and deadlines for its application in very short-term terms and urging the member states to establish a schedule for the execution of the plan by 2023, it is totally unaffordable for the fishing sector.

The declarative and continued action of gradually reducing the trawling activity until its total elimination, should the plan prosper, would mean the absolute bankruptcy of the Mediterranean fishing sector, in which trawling plays a structural role for the maintenance and volume of Critical production for the maintenance of the commercial organization of the sector, the supply of local product to the nearby market, breaks the gastronomic tradition of the consumption of fish products and an unprecedented action, which demolishes the commercial chain in force secularly for centuries.

We consider the claim to protect 30% of marine areas absolutely incompatible with simultaneously proposing the gradual prohibition of bottom trawling, without our understanding that it is necessary to establish a relationship between both objectives. The current protected areas are already prohibited for trawling and those that are newly created should be the subject of a broad debate between administrations and the fishing sector, with the aim of being able to keep the activity open, sustainable and profitable in all those areas. that are not specially protected for bottom fishing.

The action plan proposes measures that we consider out of the reality of the fishing activity, such as the prohibition of bottom fishing outside the MPAs, reducing the bathymetry or displacing fishing activities to other indeterminate areas. We consider that it is not treated seriously, rather the social and economic impacts of the proposed measures are ignored and the role of advisory councils is set aside, simply declaring stakeholders as "observers".

The action plan is positioned on purely ideological aspects, leaving aside technical regulatory aspects that have been applied through the application of the PPC reform.

The European fishing sector, which has been committed for years to progressing towards sustainability through adaptation to EU Regulations, due to its productive, social and economic importance, rejects the concept of phasing out of one of its main industries, essential for the supply of local healthy foods on our markets and for the maintenance of the rest of the existing fisheries since trawling, as the EC knows very well, is the backbone of this activity.

The undersigned fisheries Organizations call on their respective Ministers and MEPs, to strongly oppose to this wicked initiative of the Commissioner Sinkevicius, as it

would cause a productive, social and economic disaster in Europe by banning the European bottom trawling,.