

Description of the MEDAC activity on small-scale fisheries through the analysis of the meeting minutes and opinions and letters

METHODOLOGY

A deep analysis of the MEDAC activity on Small-Scale Fisheries was performed, examining the texts of all the MEDAC meetings reports, opinions and letters issued from its foundation and extrapolating the discussions directly or indirectly concerning SSF-related issues. All the meetings reports are available on the MEDAC website (<http://en.MEDAC.eu/events.php>) that includes the presentations and all the annexes related to the topic of each meeting. The opinion and letters can be found at the link http://en.MEDAC.eu/pareri_lettere.php and consist of all the documentations and communications exchanged between MEDAC and DG MARE, member states, joint recommendations and advices of MEDAC.

The analysis of the MEDAC documentation was carried out by:

- reading 101 Opinions and Letters and 202 documents, including reports and annexes;
- setting up a database to collect and find easily the meetings where and why the SSF topic was mentioned or discussed. All the documents have been classified as:
 - indications to the creation of a focus group in SSF,
 - reasons to do it, what can be useful for SSF,
 - difficulties related to the SSF management and MEDAC – SSF cooperation,
 - data collections;
- selecting the words contained in all the documents to allow easily the search of the reports, annexes, opinions and letters by topic (available on the website).

RESULTS

The analysis result is that since 2010 the SSF topic was mentioned in the 16% of the opinions and letters and it was discussed and/or mentioned in the 36% of the MEDAC meetings. It is important to know why the SSF topic was discussed so many times in order to understand the main issues that are related to the sector and to reach the aim of this phase.

The data and information since 2009 have been ranked in order to set up a search engine in the website of the project to allow easily the search of reports, annexes, opinions and letters by topic.

Analysis results of MEDAC's Reports of the meetings

The main results of the analysis highlighted as most recent (after the CFP reform) and relevant issues concerning a SSF focus group:

- 20th April 2016, 6th October 2015 and 07th October 2014 - The interactions between the recreational and small-scale fisheries in particular with regard to the coastal areas. The 12th November 2013, about the same topic, the representative of IFSUA proposes that the WG4 is transformed into a coastal fishing group including both recreational and artisanal fishing, but the proposal is quashed by the MEDACs President who reiterates that professional fishing problems are very different from recreational ones, and perhaps one could think of arranging moments in the same group for discussing both

issues, but he does not believe it is appropriate to create a permanent working group in which to mix the two topics. The WG hopes to analyze the possible application in the Mediterranean of FAO technical guidelines for recreational fishing to facilitate coexistence and integration between recreational fisheries and artisanal fishing.

- 10th February 2016 - in the context of the CFP implementation, instruments and possible actions at EU level in regional context: *"it is necessary a preferential treatment for small-scale fishing, which provides for: an action plan in the operational programs (when SSF>1000 fishing boats) for development, competitiveness and sustainability of the segment (increased aid intensity of 30% for all measurements); engine change (funding requests should be treated as a priority for the artisanal sector up to at least 60% of the loan); employment and training program specifically for youths for the small-scale fisheries."* Fabrizia Benini (Head of unit MARE D3 - European Commission Directorate General for Fisheries and Maritime Affairs);

- 7th of October 2015 - the President of MEDAC informs that DG MARE from 2013 notified to MEDAC that the WG about the socio-economic aspects was not fully justified because the CFP reform has made the assessment of socio-economic impacts mandatory, and also because the decision-making process is different (co-decision) and the EP (European Parliament) is the institution that should take care and worry about this aspect. On this topic the 8th of May 2014, the conclusions and recommendations of the SAC (Scientific Advisory Committee of GFCM) included the need to recognize the role of small-scale fishing and the need to ensure their sustainable development through a regional program on small-scale fisheries at the Mediterranean level;

- 19th of November 2014 – the President of MEDAC highlights that concerning the issue of the representation of small-scale fisheries, all MEDAC organizations represent small-scale fisheries as 70/80% of Mediterranean fisheries are small scale;

- 7th October 2014 - Small-scale fishing and fishing tourism activity: The representative of FBCP announces that Spain is trying to regulate this kind of diversification (EMPA and CRPMEM Representatives agreed on this);

- 8th October 2014 - The representative of the GFCM informs that the GFCM is committed to improve the management of small-scale fisheries. The representative anticipates that they are working on a summary sheet (concept note) for a Regional Program on small-scale fisheries, an issue on which the GFCM, in November 2013, held in Malta the Regional Symposium on Small Fishing in the Mediterranean and Black Sea, which was also attended by the President of MEDAC. Therefore, the representative encourages MEDAC to present its own position on the case studies in question through their respective States;

- 5th March 2014 - Mauricio Pulido presents the platform of Mediterranean artisanal fishermen (MedArtNet), whose objectives are: to bring together Mediterranean fishermen for developing sustainable fisheries, promote the co-management of fisheries, enhance the local ecological knowledge;

- 15th October 2013 - Federcoopescas asks whether the EC will pay more attention in making a difference between the fishing industry and the artisanal sector in the management of large pelagic fisheries;

- About the discards issue and the SSF on 23rd April 2013 a presentation is shown on discards in North Aegean Sea and the 27th February 2013 the presentation of COISPA highlights that the information on discards associated with artisanal fisheries are relatively scarce in studies on discards.

- About “what can be useful for SSF” the relevant issues in the MEDAC meetings after the CFP reform are listed below:
 - 16th March the Profilmer representative proposes to include fishermen's safety in the future discards management plan, primarily for small-scale pelagic fishing. The coordinator takes note of this and says that they will try to include also safeguarding of life at sea in the document;
 - 18th February 2016 the ArtFISHMed project, coordinated by Unimar in partnership with MEDAC, is presented to the General Assembly by Simone Serra from Unimar. The pilot project aims to identify and reinforce the level of involvement of small-scale fishing in industry organizations; to facilitate the involvement of small-scale fishing in setting up new Advisory Councils; promote the exchange of best practices that will further increase the participation of small-scale fisheries in consultative processes and in making decisions;
 - 17th February 2016 the Adriatic FG Minutes highlights the need to put exceptions in the opinions that in some cases could include small-scale fisheries, although they have a limited impact: the minutes report on the case of the small Italian, Slovenian and Croatian fishing vessels, which are excluded from the opinion for the Adriatic and for which a formula that can be shared by all will be found;
 - 10th February 2016 at the high level Seminar on the status of the stocks in the Mediterranean and on the CFP approach, the needs of SSF sector have been mentioned during various speeches:
 - the IFREMER presentation reports the need for an integrated governance for the management: also includes the promotion of sustainable small-scale and well-managed fisheries with brief market circuit (co-management, use of tracking systems etc.);
 - The MEDAC President underlines that the Mediterranean policy has not had the same effect, and this is due to various factors, among which: [...] - prevalence of artisanal fleets and small-scale fisheries; [...]
 - 10th November 2015 during the Seminar on the evaluation of management scenarios for long-term plans, the topic of SSF sector has been mentioned during various speeches:
 - Fabrizia Benini, DG MARE: the EMFF also provides funding for emergency situations, as well as conservation measures and preferential treatment for small-scale fishing;
 - Slovenia supports the debate on management measures, but underlines that in the future, it will be very important to keep in mind the efforts made in the recent past because the fisheries sector in Slovenia has already reduced the effort as much as possible and it will be essential to ensure the survival of traditional and artisanal fishing in the country;

- According to Philippe Cury, issues related to integrated governance are:
 - implementation of the GES/MFD (Framework Directive on the Strategy for the Marine Environment) and ecosystem indicators;
 - development of an integrated framework making use of scenarios made with the stakeholders;
 - promotion of spatial planning and marine protected areas for conservation;
 - incentive of well-managed small-scale fisheries;
 - development of case studies that produce positive results.
- 06th October 2015 at the WG2 on Pelagics, the representative of Federcoopesca, in the light of the positive results achieved by the stock recovery plan, now recognized by the scientific community, stresses the need that from now on, ICCAT regulations should provide for less restrictive measures against small-scale fishing;
- 6th October 2015 at the WG4 about the recreational fishing the coordinator asks the representatives of administrations their opinion on the possibility of organizing working groups to manage the activities of coastal fishing together with research on the professional and recreational sector. The Italian, French, Maltese and Greek ministries, although pointing out that recreational fishers have no great interest in participating in organizations, suggest that arrangements to involve them gradually are necessary. It is important to try to eliminate the black market associated with the sale of recreational fishery products and a ban on the use of passive gears. Federcoopesca representative stresses that prior to prohibit the use of passive gears (hooks, for example, are considered passive) it is necessary to understand what is meant by active gears;
- about the same topic, the 7th October 2014 at the WG4 the EAA representative reiterates that the coast is the most vulnerable part, both recreational and artisanal fishermen are aware of this and the 12th November 2013 the EAA representative proposes to focus the work of WG 4 on the implementation of FAO's guidelines for responsible fisheries, paying particular attention to the coastal zones, in order to examine the interactions with small-scale fisheries.
- 7th October 2014 at the WG5 about the CFP reform:
 - Antonio Pucillo (FLAI CGIL) asks to identify other activities, in addition to fishing tourism, to revive the artisanal fisheries sector and stresses that fishing tourism does not replace professional fishing, but supplements it;
 - IFSUA has also published technical guidelines for small-scale fisheries with the same methodology that includes: the description of the ethical and managerial framework, the fisheries management principles and best practices, guidelines for establishing the institutional and policy framework, the promotion of exchange of knowledge, cooperation, facilitation of best practices, the promotion of research.
- Both the presentations of GFCM (8th May 2014 and 22 April 2015) highlight that the GFCM strategic framework program includes a specific section on small-scale fishing and specific activities on this subject have been planned (i.e. the Regional Conference in Algeria in 2016)
- 7th May 2014 at the WG2 on the Reform of CFP Mr Dimitrios Pagonis, representative of seines and member of PEPMA, deepens the argument relating to the peculiarities of the Greek reality: the number of landing points, the large number of islands, small fishing

boats, disproportionate handling cost and lack of infrastructure that will aggravate further the management of discards;

- 12th November 2011 at the Comex the President of MEDAC argues that currently there isn't a group on artisanal fishing, but for sure this issue will have to be deepened as the definition and management of small-scale fishing is part of the problems of the reform and it is necessary to analyze the various measures dedicated to small-scale coastal fishing. In this regard, he recalls the letter signed by Damanaki that encourages the participation of small-scale fisheries. The President proposes that the WG for recreational fishing already constituted could create an online forum with the artisanal fisheries to identify the contact/conflict points, highlighting the competition problem of space and resources, the problem of calendars regarding stops or temporary interruptions etc.

- 16th October 2013 the presentation of the European Commission informs that among the amendments proposed by the Parliament for the EMFF is the reintroduction of small-scale coastal fishing vessels (SSCF) older than 35 years, through the construction of new fishing vessels, but under specific conditions;

- at the WG5 on the CFP reform is reported that currently there is no regulation on fishing tourism, and the RAC MED could make a proposal to the EC, proposing a European regulation in order to have a common legal platform that all MS will have to comply with;

- 22nd April 2013 Mr Mauricio Pulido, fisherman gives the Example of an efficient management plan for sustainable fishing for sandeel through co-management implemented in Catalonia - Snezana Levstik (KGZS) believes that co-management is a great opportunity for sustainable fisheries.

- The speeches about the “difficulties related to the SSF management and MEDAC – SSF cooperation” since 2013 have been:

- 20th April 2016 at the ComEx the draft document regarding the interactions between small-scale fishing and recreational fishing is not approved due to the opposition of the majority of those present;

- 10th February 2016 at the high level Seminar on the status of the stocks in the Mediterranean and on the CFP approach, the problems of SSF management have been mentioned during various speeches:

- the EFCA presentation informs that the 85% of the EU fishing fleet is small scale (<12 m) and is therefore exempted from VMS/AIS;

- MEDAC reports that among the reasons why in the Mediterranean the Common Fisheries Policy has not achieved the same results achieved further north there is the prevalence of small-scale fishing fleets and artisanal fisheries;

- LIFE platform emphasizes that fishermen will accept limits if they are involved in the decision-making process, but the involvement must be real, if you want the rules to be accepted and respected;

- 10th November 2015 at the Seminar on the evaluation of management scenarios for long-term plans the General Director of the regional department for fisheries in the Mediterranean of the Sicilian Region believes it is necessary to focus on the creation of a

program, since it appears it is the artisanal fisheries that pay the price of actions taken for the larger commercial fishing;

- 6th October 2015 the WG4 coordinator lists the main problems and solutions identified on the interaction between small-scale fishing and recreational fishing: distance of passive gears (distance limit from the coast), spawning grounds and aggregations (mapping and spatial planning), exemption from keeping a log-book (no exemption), recreational fisheries management (identify and involve recreational fisheries stakeholders), new fishing techniques (assessment of impacts and limiting catches), black market (more controls, i.e. restaurants), commercial fishing over-protection by the regulations (include recreational fisheries stakeholders), access priority e.g. MPA (making appropriate impact assessments), fishing pressure (include recreational fisheries stakeholders), gear allowed (prohibition of passive gear for recreational fishing), shared resources (survey of fish species and the economy generated);

- 10th March 2015 the presentation of French Ministry highlights that small-scale fishing is mixed and an assessment of the status of the stock of many target species is not available, with the exception of small pelagics, the data is missing (biological and capture);

- 20th November 2014 at the Focus Group on GSA17 the coordinator confirms that the limitation of the height of the seine to 70%, as required by the Mediterranean Regulation, is a problem that could be solved through the present LTMP given that there appears to be an impact on the seabed with the use of traditional gear. Professor Ferretti confirms what was said by the coordinator and points out that the problem is mainly in the Adriatic because it has shallow depths and exists for all of the MS in the area and, therefore, regionalization could be a useful tool;

- 19th November 2014 at the ComEx, the Executive Secretary noted that the MEDAC, during the Inter-AC meeting held on 30 October, raised the question of the provision of compensation for fishermen engaged in small-scale fishing for fishing days lost to attend AC meetings, which should not only reimburse the travel and accommodation expenses, but also give an additional contribution and this would give rise to a budgetary programming problem;

- 8th May 2014 at the WG3 Management Plan and GFCM the representative of the GFCM reports that during the Symposium, an ad hoc session was held on the definition of small-scale fishing, but probably it will not be possible to have a definition that is acceptable for everyone because the Mediterranean has a very diversified fleet: there are fishing and aquaculture methods in part artisanal, part of small-scale coastal fishing and even differences at the intra-regional level;

- 16th October 2013 at the WG5 about CFP reform FNCCP notes that the EMFF provides ad hoc measures for small-scale fishing, but the definition of 12 m LOA is not a sufficient parameter and there is the risk that many fishing vessels which fall in the small-scale fishing sector but which are larger than 12 m will not be able to make use of these funds that are provided by the new Fund;

- 27th 2013 at the WG1 "Reform of CFP" two speeches regarded this topic:

- DG MARE representative: Discards in the Mediterranean are particularly juveniles and the black market must not be increased, which is why financing

mechanisms have been provided in the new Fund to improve gear selectivity, especially for small-scale fisheries;

- COISPA: Data on discards are collected during fishing trips by an observer on board: some difficulties are experienced in some situations/areas given by the problem of being an observer on board a small boat (for small-scale fisheries);

- About "data collection" the relevant issues in the MEDACs meetings after the CFP reform are listed below:

- 20th April 2016 the Comex draft contains a proposal to extend the obligation of keeping a logbook to all vessels, including those less than 10 meters LOA;

- 10th February 2016 at the at the high level Seminar on the status of the stocks in the Mediterranean and on the CFP approach, the data collection issue in the SSF sector have been mentioned during two speeches:

- EFCA raises the data collection for fishing vessels exempted from VMS/AIS and ERS: recording and transmission of on-board activities through telephone technologies and/or Wi-Fi in the port;

- Marina Petrou, Director of Fisheries, Greece, also stresses the importance of controlling using easy to apply measures, given the length of the coast: satellite monitoring of all vessels over 12 m LOA and of all tuna vessels would be ideal.

- 10th November 2015 MEDAC suggests that the preparation of management plans for discards for demersal stocks includes small-scale fishing, and specifically: the definition of national focal points, the definition of "pilot ports" for each Member State to assess the costs in relation to the landing obligation from 2019, to start collecting data on fuel costs and new cataloguing of studies relating to the landing obligation;

- 10th November 2015 at the Seminar on "Evaluation of management scenarios for long-term plans" the President points out that it is necessary to take into account the socio-economic impact of a drastic reduction in fishing effort and believes that the issue of how to reach the MSY with space-time measures with a less drastic reduction of the fishing effort should be deepened;

- 8th October 2015 at the WG1 "Discards - Demersal fish" the MEDAC President suggests to carry out some studies, taking as example some sample ports to start having an idea of the landing of undersized fish and make simulations, and which are the related costs. The President proposes to work by identifying, in each Member State, a port where to carry out the studies and simulations, defining what is the fishing type and cost of the product, from fishing to processing and revenue, in order to be able to obtain the profitability and check whether for demersal fish there is the possibility of falling into in the second paragraph provided by Article 15, that is "disproportionate costs";

- 7th October 2015 at the WG5 "Small-scale fishing and socio-economic impact" with regard to the technical document, the President suggests to prepare a scheme with a period defined in the last five years, in which the data relating to the number of employees, turnover, the size of the craft (GT), the number of boats and the quantities of fish are available;

- 6th October 2015 at the WG4 "Recreational fisheries" the EEA Representative proposes to identify the target species of recreational and artisanal fisheries;

- 22nd April 2015 the GFCM representative presents the working plan for the 2015-2016 resulting from the 17th session of the SAC with regard to the management plans that includes investigations on the methods to be adopted for stocks with limited data (DLS), in particular for vulnerable species such as elasmobranchs and red coral, and for the assessment of stocks that are the target of small-scale fishing;
- 7th October 2014 at the WG5 “CFP reform” the Coordinator Antonio Pucillo hopes that data on socio-economic aspects in the various Member States can be updated to draw up an inventory of small-scale fishing gear. The coordinator points out that the agenda includes a discussion on a catalogue of small-scale fishing activities and proposes to draw up a questionnaire. The representative of FBCP proposes to include: ways of fishing, periodicity, fishing campaign, species caught, location, use of fishing gear, current legislation, a description of the gear;
- 27th February 2013 at the WG1 “Reform of CFP”:
 - the DG MARE presentation points out that MEDAC can help in the implementation of the CFP in the EU by assisting in the definition/adoption of management plans (feedback on the status of stocks, gear selectivity, characteristics of artisanal fisheries etc.);
 - MEDAC informs that the topics covered in the questionnaire to be submitted to member states will include: Gear recovery exemption <12 m LOA, Sampling plan for fishing vessels not subject to fishing logbook obligation (<10 m LOA) and not subject to compulsory landing declaration (<10 m LOA), exemption from the obligation to issue a sales note for product landed from the vessels <10 m LOA and <50 kg by species (acceptable sampling system)

Analysis results of MEDAC's Opinions and Letters

The analysis highlighted as most recent (after the CFP reform) and relevant issue concerning a SSF focus group, the MEDAC opinion for a regulatory framework and efficient management for recreational fisheries in the Mediterranean: “The word “artisanal” is deemed inappropriate to describe commercial coastal fishing because it includes an important degree of subjectivity. It is considered much more appropriate to call it Small Scale Fisheries (SSF) - The MEDAC believes that the stakeholders to be involved in the management of recreational fisheries include small-scale fisheries”.

- About “what can be useful for SSF” the relevant issues in the MEDACs Opinions and letters after the CFP reform are listed below:
 - MEDAC opinion for a regulatory framework and efficient management for recreational fisheries in the Mediterranean: “Management intervention hypotheses on the regulation of recreational fishing: one of the main effects of the prohibition of using passive gear for recreational fishing would be getting rid of many conflicts with the small-scale fishermen who use the same gear, as well as decreasing catches, increasing biomass and having much more control of the species caught and their size”;
 - 11th March 2016, MEDAC opinion on LTMP for small pelagic fish in GSA 17: “Need to take the small communities into account in the management plans: purse seine fishing

carried out by a fleet with length less than 12 m participates for less than 2% in the total catch of seine fishing of Italy, Slovenia and Croatia, and on the other hand, this fishing segment represents 13% of the total seine boats. Due to the high socio-economic value and ecological assessments, the MEDAC asks that this fleet segment (<12 m for the whole GSA 17 and <15 m for the west coast of Istria already up to the Lim Channel and the Gulf of Trieste) is excluded from the proposed management measures in the yellow and orange areas of the "traffic light" approach";

- 11th September 2015, MEDAC contribution to the public consultation by DG MARE on the Regulation establishing a long-term management plan for small pelagic species in GSA 17: "It's important that multiannual plans for fisheries take into account the protection of traditional local fisheries and interaction between different types of fishing that have the same species for target";

- 16th October 2014, MEDAC opinion on bluefin tuna: "The Executive Committee requires that there be the possibility to draft new rules for small-scale fishing, respecting the principles of sustainability of the CFP (Reg. 1380/2013), in order to return greater access to the resource";

- Comments on the opinion of MEDAC on a joint recommendation for a discards management plan: "List of exception requests for artisanal fishing: for pelagic trawling and for French purse seine it would be impossible to develop new selective gear by 1 January 2015, without causing a dramatic impact on artisanal fisheries. Call for exceptions on the landing obligation for purse seine in relation to the high survival rate of the species";

- The opinions and letters about the "difficulties related to the SSF management and MEDAC - SSF cooperation" since 2013 have been:

- MEDAC opinion for a regulatory framework and efficient management for recreational fisheries in the Mediterranean: "The report considers that small-scale fisheries include traditional commercial fishing activities that include family run fishing and that simply make day trips, with the use of boats up to 12 m with a relatively small investment of capital and effort";

- 11th April 2016, MEDAC contribution- Public consultation-Evaluation of the Control Regulation:" Among the weaknesses related to the fisheries control regime, it is pointed out that the positive discrimination of "small-scale fishing" is detrimental to the other sectors, recreational fishing (RF) in particular, when the two sectors fish the same species and/or in the same waters";

- 27th March 2014, Opinion on the Omnibus proposal COM 2013 (889): "The MEDAC expresses its concern about Article 25a on remote electronic monitoring, due not only to the cost of installation and management, but also to legal aspects of employment law in some of the European Member States. This measure, and consequently its applicability, does not seem realistic especially for medium/small boats since in European countries of the Mediterranean there are over 30,000 small-scale fisheries boats. - The separate stowage of undersized product is especially unenforceable for medium to small vessels (ref. Art. 7.8)";

No opinions and letters have been exchanged regarding data collection after the CFP reform.

Conclusions

The results of the analysis have been complemented with the information provided by the MEDAC members by identifying the main issues related to the SSF sector:

- the European definition of small-scale fisheries needs to be reviewed: “there is no only one «small-scale fishery», but many individual small scale fisheries. The status of the fishing activity varies according to the vessel, the type of fishery, the season, the fishing area and the company structure”;
- Low level of capitalization;
- Extreme difficulty in borrowing;
- Lack of capacity for investment and innovation;
- Obsolete vessels (on average over 30 years old);
- Low bargaining power on the market (except for direct sales in port or restaurants);
- Difficulty in enhancing the value of the product on board or once landed, due to lack of adequate port infrastructure;
- Frequent conflicts between the different *métiers* (especially with trawl fisheries);
- Competition with recreational fisheries;
- Lack of compliance with on board safety regulations;
- Lack of generational change;
- Need for data reporting from SFF to improve management;
- The EMFF doesn't foresee measures for initiatives related to safety on board: it would be useful to envisage rapid tracing systems and a direct, automatic link to emergency services;
- There are constant difficulties for small-scale vessels where moorings are concerned, either due to port structure and with regards to availability of fully serviced docking areas;
- The lack of recreational and sport fishing specific permissions can, in some areas, penalize the professional activities of the small-scale fisheries sector, as well as the use of typical gears of the professional Sector (longlines and pots), still allowed (in some Member States) for recreational and sport fishing. Recreational fisheries and small scale fisheries often target the same fish species. The lack of catch data on some species makes it difficult to evaluate the catch ratio of professional and recreational fisheries and the impact on fishing resources;
- The development of pesca-tourism should be favored by the provisions of art. 30 of the EMFF (diversification and new forms of income) that envisages economic support for 50% of the initiative foreseen in the business plan, up to a maximum of 75 000€. For activities that could be amplified in coastal areas and could relocate workers no longer employed in the fisheries sector the EU has not shown particular interest;
- Small-scale fisheries are the first ones affected by deteriorating conditions in coastal areas due to industrial activities both on land and at sea (e.g.: drilling/mining, leaks and spillages, etc.), as well as by changes to coastal sediments. The EMFF includes intervention in the context of “environmental” problems with the activation of a fund (with a loss-sharing mechanism) addressing affected aquaculture producers (art. 57) and fishers (art. 35).