

EP(20)35

COMMISSIONER
Virginijus Sinkevičius
European Commission
Rue de la Loi 200
1049 Brussels
Belgium

Brussels, 27th June 2020

Re.: Implementation of the Western Mediterranean Multiannual Plan

Dear Commissioner Sinkevičius,

As you are aware, the European fishing sector represented by Europêche has experienced an unprecedented crisis due to health, trade and market disruption caused by the COVID-19 outbreak. The crisis has hit especially hard the Mediterranean countries where most of the coastal fishing fleets had to stop fishing for several weeks. The closure of HORECA channels, lack of tourism, extremely low prices and health problems have had a very negative impact in the income of our fishermen and it does not seem likely to improve significantly in the short or medium-term in this region.

Under these exceptional circumstances, Europêche calls on the European Commission to be sensitive and as flexible as possible in the implementation of the newly adopted multi-annual plan for the western Mediterranean in a way that does not aggravate the socio-economic consequences caused by this pandemic.

In this sense, the plan establishes a closure for trawls operating within 6 nautical miles from the coast except in areas deeper than the 100 m isobath during three months each year and, where appropriate, consecutively, on the basis of the best available scientific advice. Those three months of annual closure shall be determined by each Member State and shall apply during the most relevant period determined on the basis of the best available scientific advice.

First of all, Europêche would like to stress that in order to better protect nursery areas and high aggregations of spawning individuals, closure areas should have been dictated on a depth basis and not based on the distance from the coast. In this sense, the planned closures of article 11.1 are not scientifically justified since the latest available scientific data evidence that the populations of juvenile hake are not found in these areas, quite the opposite they remain outside the 100 m depth. The European Union's Scientific, Technical and Economic Committee for Fisheries (STECF) recognizes that sub-adult hake populations are concentrated inside the 100 m area, so that if these closures were to be applied, there would be a shift of pressure towards the juvenile hake areas (100-200 m deep). Therefore, a complete revision of article 11 is urgently needed.

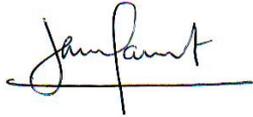
In addition, as indicated in recital 26 of the Regulation, the establishment of these closures additionally seek the zoning of the fishing grounds with the intention to leave these areas exclusively for small-scale fishermen. It is obvious that this goal has little to do with the conservation of the fishing resources which is the ultimate goal of the Regulation. The trawler fleet and the artisanal fleet already coexisted without major problems within these spaces, and it should be reminded that trawling was already not permitted in areas up to a depth of 50 m where small-scale fishermen operate.

In short, from our point of view, the industry is facing "political" fishing closures adopted due to the enormous pressure exerted by environmental organizations, which were not sustained by scientific or resource conservation arguments.

Furthermore, the sector calls on the European Commission and Member States to compute and deduct from the three-month period the temporary cessation caused by the COVID-19 outbreak. This would certainly help our fishermen to compensate for the heavy financial loss suffered in the region.

We thank you in advance for your consideration and for the efforts the European Commission will put forward to assist our fishermen's organisations.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Javier Garat', with a horizontal line underneath it.

Javier Garat
President of Europêche