



The Director-General

Brussels,  
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Mr Giampolo Buonfiglio  
Chairman  
MEDAC  
c/o Ministero delle Politiche  
Agricole, Alimentari, Forestali e del  
Turismo  
Via XX Settembre, 20  
00187 Roma  
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**Subject: Reply to MEDAC contribution on the socio-economic indicators related to the forthcoming draft GFCM MAP on demersals in the Adriatic Sea**

*Your references: 193/2019*

Dear Mr Buonfiglio,

Thank you very much for your letter of 16 September 2019 informing us about MEDAC's working document on the GFCM multiannual plan for management of demersal fisheries in the Adriatic Sea.

I take note of the in depth analysis performed on the results of STECF work and SAC conclusions. A GFCM demersal plan would be in compliance with the objectives of the CFP in having Fmsy targets, clear timelines as well as safeguards, as it is stressed in your opinion. Such plan would also bring a level playing field to the entire Adriatic Sea. By also covering Third Countries as Albania and Montenegro, all riparian countries would need to ensure the same levels of control, reporting obligations, fishing effort limitations and technical measures.

I will address the main points raised in your opinion on a GFCM Adriatic demersal management plan:

- 1) The geographical scope would be the entire area GSA 17 and 18. For the Adriatic Sea there has been no discussion on the establishment of a closed area down to the 100m bathymetry. Amongst various possible spatio-temporal closures, there could be one for the area within the 6nm or one of at least 20% of territorial waters to protect areas of high concentration of juveniles or spawners.
- 2) To sustainably manage fish stocks it is key to include the fisheries exerting the highest fishing mortality on the target stocks. MEDAC indication, on the need of including all demersal commercial stocks and most dependent fleets, is very

important. A GFCM plan could initially focus mainly on towed gear and GFCM priority stocks, while remaining open, at a later stage, to the addition of other gears and stocks, including SSF and recreational fisheries.

- 3) Concerning management measures, MEDAC's support for a fishing effort regime highlights the appropriateness of an input control approach for managing fishing mortality. A first transitional two-year effort quota could be based on a fixed reduction in fishing days. While, in a second phase, based on the state of the stocks in 2020, SAC could design different scenarios of effort reductions upon which GFCM could choose the best option.
- 4) Effort reductions being proportional to the level of the fleets effort is in line with the concept that the fleets bringing the higher fishing mortality to the stocks should reduce more.
- 5) I understand your concerns on potential socio-economic impacts of measures envisioned in the GFCM plan. While these should improve the state of the stocks and thus the fleet's profitability in the long term, there could be short-term impact. Offsetting such impacts could be achieved through, for example, national management plans (under EC 1967/2006), which are a valid legal basis for granting temporary cessation under EMFF funding.
- 6) MEDAC's general support for the establishment of further FRAs in the Adriatic is a very important recognition of the positive impact of the Pomo/Jabuka FRA. New FRAs could certainly contribute to boost the recovery of demersal stocks. The GFCM plan could task SAC to evaluate the possibility of adopting further FRAs in the Northern and Southern Adriatic Sea, thus also potentially including the area identified as "sole sanctuary". The argument that a sole sanctuary is not needed on the basis of catch fluctuations does not seem scientifically sound. The sole stock is overexploited and at low biomass since many years, thus an area where juveniles and adults could be protected, combined with effort reductions, could help improve the stock status.
- 7) I welcome your support for a freeze in fishing capacity and this measure could be one of the key objectives of the GFCM plan in combination with a list of authorized vessels.
- 8) I welcome your support for MCRS for key stocks and for a pilot project for a joint inspection. Such measures would apply to all countries under the plan, thus also Albania and Montenegro.

My services will present further details on the GFCM management plan proposal at the forthcoming MEDAC meeting in October.

I would like to thank you very much for your valuable contribution. Be assured that MEDAC's opinions are an important contribution to our preparations for the GFCM Annual Meeting and our discussions with EU Member States and Third Countries.

Looking forward to our continued cooperation, I invite you to take contact with Ms Pascale Colson, coordinator of the ACs ([Pascale.Colson@ec.europa.eu](mailto:Pascale.Colson@ec.europa.eu); +32 2 29 56273), should you have any question on this reply.

Yours sincerely,



Bernhard FRIESS  
Acting Director-General