



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE/D1/ACD

Dear Mr Antonio Marzoa Notlevsen,

Dear members of the Mediterranean Advisory Council,

I would like to thank you for the latest advice from the Mediterranean Advisory Council <sup>(1)</sup> on the next steps of the multiannual management plan for demersal stocks in the western Mediterranean Sea (the MAP, <sup>2)</sup>).

Since its entry into force, the implementation of the MAP has relied on the best available scientific advice provided by a series of STECF meetings where scientists of the three concerned Member States as well as stakeholder observers participated. In addition to the permanent improvement of data collection, bioeconomic modelling and estimation of reference points, the STECF has further developed the socio-economic elements of their advice, building on the work done in the context of the STECF Annual Economic Report. I am thus surprised by the statement that there is no socioeconomic analysis for the MAP impact.

As mentioned during our discussion in April at the MedAC Focus Group on the western Mediterranean Sea, the STECF stock assessment conducted during year n uses all data available until year n -1. This 2-year lag between data and advice is common in all EU MAPs and cannot be taken as a reason to pause the West Med MAP implementation. While recent STECF evaluation has shown that the stocks and ecosystem recovery stemming from the MAP measures have started, we agree that the effects of the MAP measures will continue after the end of the transition period.

As you know, the western Mediterranean MAP is the only EU MAP with a derogation to achieve fishing mortality securing MSY levels by 2020. This unique derogation was granted by the co-legislators to take into account the socio-economic specificities of the region. The MAP is working, fish biomass has started to grow as noticed by fishers and STECF, and the achievement of Fmsy by 1 January 2025 remains the MAP legal

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<sup>(1)</sup> Ref.: 108/2024

<sup>(2)</sup> EU Regulation 2019/1022

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obligation. Legally, all provisions of the MAP remain valid after 1 January 2025. In particular, after the MAP transition period, the provisions of Articles 4 and 6(1) of the MAP will apply and the Commission proposal will be based on the latest STECF scientific advice including MSY target and ranges.

As regards the fishing mortality stemming from other fishing gear, we take note of your suggestion and have called on Member States to provide the adequate length-frequency data for all fishing gear, in particular for hake, in order for the Med&BS data call to be as complete as possible and for STECF to provide best available scientific advice on this important management aspect. In addition, regarding small-scale fishers, further discussions are being organised on good practices and guidance to secure a smooth transition into the implementation of all elements of the revised EU Control Regulation, including logbooks.

Finally, on the question of fishing opportunities, the allocation is the prerogative of Member States as per Article 17 of the CFP regulation and the inter-annual flexibility only applies to quotas as per Article 4 of EU Reg 96/847 and Article 15.9 of the CFP Regulation. There is no legal provision to apply it to trawling fishing days. I take the opportunity of this letter to reiterate that the MAP was adopted under the co-decision process and thus cannot be modified by a delegated act.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact the functional mailbox of the Advisory Councils [MARE-AC@ec.europa.eu](mailto:MARE-AC@ec.europa.eu).

Yours sincerely,

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