

Mr. Virginijus Sinkevičius

European Commissioner for Environment, Oceans and Fisheries

Brussels, 14th April 2021

Subject: ban on all types of bottom fishing in the Gulf of Lion FRA

Dear Commissioner,

This letter follows the question for written answer sent on December 7th 2020 on the Effectiveness of the Gulf of Lion fisheries restricted area¹.

The Gulf of Lion is an important area for fish populations and marine biodiversity in the Mediterranean, which hosts a variety of sensitive habitats (Posidonia meadows, coralligenous habitats, submarine canyons, etc.). For years, it has been a strategic fishing area for French and Spanish fleets, which has largely contributed to a considerable biodiversity loss observed over the last two decades.

Fisheries Restricted Areas (FRAs) are an essential tool created by the General Fisheries Commission of the Mediterranean (GFCM) to help restore fish populations and protect vulnerable marine habitats. Since 2005, nine FRAs have been established in the Mediterranean.

The Jabuka/Pomo Pit FRA, established in 2017 in the Adriatic Sea, is a concrete example of what can be done to rebuild overexploited fish stocks and restore ecosystems while offering a perspective to fishers, who economically depend on them. It has been set up in a strategically important location, a breeding ground for some species. It includes a strict reserve where bottom fishing is prohibited and a buffer zone where fishing effort has been reduced. Eighteen months after its establishment, the biomass of hake has increased 2.5 times and that of Norway lobster has doubled². In addition, the success of the Jabuka/ Pomo Pit FRA relies also on the widespread support from fishers, who saw increased catches.

The FRA in the Gulf of Lion was set up to preserve the spawning stock of hake and other commercial species but failed to meet its targets because of a lack of political will. The GFCM, against the advice of its own scientific committee (the **Scientific Advisory Committee on Fisheries (SAC)**) which recommended to ban **the use of towed and fixed gear and longlines for demersal resources in the area**³, authorised maintaining the level of fishing effort applied in 2008. Today, hake stocks are on the verge of collapse in the Gulf of Lion, with a fishing mortality

¹ Question for written answer E-006644/2020 to the European Commission
https://www.europarl.europa.eu/doceo/document/E-9-2020-006644_EN.html

² N. Vrgoc; C. Piccinetti; I. Isajlovic; C. Manfredi; D. Medvešek, 2019. Preliminary data on the bottom trawl surveys in Jabuka Pit. Subregional Committee for the Adriatic Sea (GFCM, Split, Croatia)

³ "including trawl gears, bottom and mid-water longlines, bottom nets (gillnets, trammel nets) and traps in the proposed zone" GFCM. Report of the eleventh session of the SCIENTIFIC ADVISORY COMMITTEE. Marrakech, Morocco, 15 December 2008 <http://www.fao.org/3/i0635b/i0635b00.pdf>

rate 15 times higher than the Maximum Sustainable Yield (MSY), and 90% of the females and 41% of the males caught are juveniles that have never reproduced.^{4,5}

The FRA in the Gulf of Lion no longer appears to be an important fishing area, with total fishing effort in 2019 amounting to 10 vessels totalling 170 days in the FRA⁶. Its permanent closure to all types of bottom gears is an investment that would offer short, medium and long-term benefits. It would allow an increase in biomass of commercial stocks that would guarantee a future for sustainable fisheries but also protect marine biodiversity. It is a condition for the resilience of oceans and their capacity to store carbon. On the latter, we would like to recall the recent publication in the scientific journal Nature, highlighting the immense carbon cost of bottom trawling⁷.

The DG MARE is currently preparing recommendations to be submitted to the next GFCM General Assembly. This meeting constitutes an opportunity to change the weak management rules in force in the FRA in the Gulf of Lion. Last December, 10 NGOs wrote a letter on this matter to French ministers⁸.

Therefore, we ask you to support and actively promote a total and permanent ban on all types of bottom fishing in the FRA in the Gulf of Lion.

We know your commitment in favour of reversing the worrying trend in the Mediterranean, protecting fish stocks and marine biodiversity as a whole in line with the MedFish4Ever declaration, as well as safeguarding the future of fisheries and ensuring the transition of the sector.

Sincerely yours,

Caroline ROOSE

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⁴ GFCM Scientific Advisory Committee on Fisheries (SAC), 5 April 2019, Third meeting of the Sub regional Committee for the Western Mediterranean (SRC-WM), p 22

⁵ Coll M, Vilas D, Corrales X, Piroddi C, Steenbeek J (2019). Report on the quantitative food web models calibrated with time series of data. Sustainable Fisheries in EU Mediterranean waters through network of MPAs - Safenet MARE/2014/41

⁶ Official figures provided by France to the GFCM

⁷ Sala, E., Mayorga, J., Bradley, D. et al. Protecting the global ocean for biodiversity, food and climate. Nature (2021). <https://doi.org/10.1038/s41586-021-03371-z>. <https://www.nature.com/articles/s41586-021-03371-z>

⁸ <https://medreact.files.wordpress.com/2020/12/lettre-ong-golfe-du-lion-fra.pdf>

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