

### MEDAC contribution to the EMFAF Mid Term evaluation

MEDAC is not able to give a mid-term assessment because the calls for tenders for the EMFAF have not yet started in several Member States (MSs). The expectation is that they will be launched by the year 2024.

In 2023 and 2024 MEDAC analyzed and compared the different measures under the EMFF and the EMFAF. The difficulty was in dividing the measures, given the change of approach between the two programming periods (list of possible measures in the EMFF and the possibility for MSs to introduce new measures, as long as they are aimed at achieving the objectives envisaged). More information on it is available on this [LINK to the presentations](#).

In addition, MEDAC replied to the questionnaires proposed by the European Commission ahead of the mid-term review in April 2024 ([LINK](#)).

During the last MEDAC meeting in Athens (June 2024), several criticisms were reported from the fishing sector, highlighting that the situation of resources does not appear to have improved much despite the efforts imposed only on fishers. The reasons behind include the difficulties in controlling non-EU fleets and the real impact of extra-fishing factors on the environment, such as pollution, commercial traffic, climate change, etc have not ever really assessed. Consequently, the EMFAF funds may not be effective. So the management measures are charged to fishers only, with continuous reductions in fishing days.

In addition, the European fleet in the Mediterranean basin is quite obsolete and the funds available for modernization are limited in terms of amount and possible beneficiaries. Moreover, the (few) opportunities of changing engines are based on the evaluation of their power used in the sector of trading shipping, which is not suitable for fishing. Such engine replacement measures should be incentivized to have more environmentally sustainable engines on board.

From a social point of view, there is a lack of effective accompanying measures, for example to the final cessation considering the social and economic impact.

On the other hand, the MEDAC recognized that there is some simplification in the EMFAF defining what cannot be done and leaving some autonomy to the Member States in order to achieve the objectives.

In summary:

Effectiveness of EMFAF measures: not yet judgeable.

Croatia: In the Republic of Croatia there have been several tenders for the EMFAF measures to date.

There has been a tender for the Permanent cessation of fishing activities Measure, the tender finished, most of the vessels are already decommissioned while the decommissioning of the last vessels is currently underway, therefore the Republic of Croatia has fully used the funds allocated for that measure. The efficiency of the measure of permanent cessation of the fishing activities will not be complete unless the capacity of the fleet is harmonized with the fisheries management measures on the Adriatic (the drastic reduction of the fishing activities in the current and subsequent years determined by the Administration). This is why, for socio-economic reasons, it is indispensable and urgent to ensure new additional resources for the measure of permanent cessation of fisheries.

Furthermore, The Republic of Croatia has the obligation to implement two months of temporary closures every year , ie. in 7 years there have to be 14 months of temporary closures of small pelagic fisheries (however we all have to bear in mind that the Republic of Croatia will actually implement 21 months of temporary closure of small pelagic fisheries which corresponds to three months a year). The EMFAF approves the allocations for 12 months of temporary fisheries cessation and the funds/amount approved in EMFAF are sufficient for 6 months only.

The Republic of Croatia has so far announced and implemented tenders for 6 months of closures for the small pelagic fisheries sector (two months a year as prescribed by the Multiannual Management Plan for Small pelagic fish – GFCM). We are short of funds for the following 6 months of temporary fisheries cessation that we have to implement due to the already prescribed legislation.

Efficiency of EMFAF measures: it will depend on the level of attractiveness of the measures, on the feasibility of the implementation and the related speed of payments.

Relevance: it will be essential to have measures considering the impact of factors impacting on the environment other than fishing activities and which have important repercussions on companies and workers in the sector.

Coherence: it will be essential to focus the attention on the economic and social aspects together with the environmental ones.