



LDAC Advice in view of the next EU-Mauritania SFPA Joint Committee, including recommendations on the small pelagic management plan proposal for Mauritania, and demersal fisheries where EU operators are involved

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Small pelagic management plan proposal for Mauritania

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The LDAC welcomes the management plan for small pelagics proposed by Mauritania. Implementing this plan in a way that will ensure the sustainable management of small pelagics, AND the recovery of the over-exploited sardinella, is an essential part of the European Union (UE) -Mauritania Sustainable Fisheries Partnership Agreement and the future uptake and involvement by the EU pelagic industry.

As result of the 2022 Assessment Working Group of the Fishery Committee for the Eastern Central Atlantic (CECAF)¹, the state of the stock of Sardinella (*S. Aurita*) would require *a substantial and immediate reduction in fishing effort and mortality. The Working Group cannot quantify exactly how much fishing effort should be reduced, but in view of the degraded situation of this stock, and as a precautionary approach, it proposes a reduction of at least 60 percent in mortality.*"

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General reflection and need to prioritize measures for implementation

The management plan presented is very complex, and the LDAC considers essential to prioritize what are the key measures that should be at the heart of its implementation, and which will require the most efforts from Mauritania, and support from the EU and other partners. In the following paragraphs and final recommendations, the focus will be on what LDAC considers to be major actions to be taken.

Currently, we feel there is no clear management objective, that would provide priority access to those who fish for human consumption, contributing to food security. Indeed, the processing of vast, largely unknown, quantities of small pelagics into fishmeal and fish oil is still an important concern.

¹ Fishery Committee for the Eastern Central Atlantic (CECAF)
Results from the 2022 Assessment Working Group – northern subarea



Setting up of Total Allowable Catches for small pelagics at regional level

Support to scientific capacity

Support should be provided so that scientists from Mauritania and neighbouring countries sharing the stocks of small pelagics, - including Senegal and the Gambia-, set up a joint team to coordinate an intensive research program and prepare assessments for the FAO working group on small pelagics.

Mauritania should seek the support of the EU in making improvements to its research capacity, preferably in the context of regional cooperation with its direct neighbours, notably in the training and capacity building of scientific observers in order to comply with the requirement to embark observers on all fishing vessels.

In particular, data on the state of the stocks are clearly underestimated due to the lack, or even the absence, of information on the catch data of the artisanal and coastal sector (national regime) whose fishing capacities and the quotas are recognized by Mauritania as exceeded, due to the lack of register and détailled catch data mechanism.

Setting of TACs

The foundations of any management plan are robust scientific data (reliable and complete) cf. last LDAC advice and active stock management based on those data, preferably using TACs and quotas. Therefore, the main aim of the management plan should be to create these main pillars under the plan, with priority over the other goals, which can only follow from the first.

A precautionary approach to the setting of TACs and quotas should be strictly adopted based upon best scientific advice.

Governance of the future management plan

Regional cooperation

Considering the distribution of the stocks, small **pelagic stocks like sardinella cannot be managed on a national basis** and a mechanism should be developed in order to set up the TAC jointly with the other coastal countries that have a share in these fisheries, namely Senegal and the Gambia, along the lines of the FAO working groups recommendations. This is particularly urgent for sardinella, which are heavily over-exploited.

On the management level, these countries should set up a committee for the adoption and implementation of joint management measures aimed at the recovery of the sardinella stock and sustainable management of all small pelagic species.

Participatory approach and meaningful consultation of stakeholders

The implementation of joint management measures should be done in consultation with the coastal communities and fishers who depend on sardinella for their livelihoods and food security. Existing professional/civil society platforms (like the non-state actors platforms set



up with the support of the African Union, funded under the PESCAO project), fishers organisations, women fish processors organisations, etc should be informed and consulted for the development and implementation of these joint management measures, and the necessary accompanying measures that will mitigate the potential negative impacts on local employment.

This approach is in line with Mauritania's commitments in its 2022-2024 fisheries strategy to consolidate consultation mechanisms between stakeholders and conforsts the implementation of the FAO Guidelines on artisanal fisheries. This is also consistent EU's approach already supporting professional organizations in the artisanal sector like the National feredation for small-scale fisheries (FNPA).

Any evaluation of the management plan should also include the EU and its industry.

Objectives of the plan in terms of development of the sector

Prioritizing the use of small pelagics for human consumption

The LDAC welcomes the measures taken by the Mauritanian government to promote the use of small pelagics for human consumption, rather than their reduction into fishmeal and fish oil.

Pelagic fish are fatty fish containing the highest amounts of omega-3 fatty acids, essential to healthy and nutritious diets. In addition, pelagic fish is often the most affordable source of proteins available locally, making a substantial contribution to food security. On average, the EU's pelagic freezer-trawler fleet already provides over 5 million meals of fish per day to countries on the African continent, for human consumption.

The LDAC suggests the commission through the SPPA sectoral support to collect data on the proportion of small pelagics used for human and fishmeal/fish oil consumption in order to properly assess the results of the management plan.

Faced with the growing demand of Mauritanian populations for seafood products, which is currently difficult to meet, Mauritania affirms that it will give more importance to food security and the EU must support Mauritania in its regulatory transition towards "less fishmeal and more pelagic products or human consumption", the objective of which being to reach in 2024 a ratio of 35% of the volume landed for fishmeal and oil, instead of 80% currently, and that this 35% is based wastes and not fish suitable for human consumption².

² MPEM, Stratégie d'Aménagement et de Développement Durable et Intégré des Pêches Maritimes 2020 - 2024 and MPEM, Lettre de Politique et de Planification (L2P) du Secteur des Pêches et de l'Economie Maritime, période 2022-2024.



Developing the Mauritanian fisheries sector

The EU pelagic fleet has no intention of competing with the Mauritanian domestic, home-grown fleet in the region and the 'surplus approach' should work well if the data used are valid. Whether through sectoral support or otherwise, the EU and its industry are in a better position than anyone else to support Mauritania to further develop a sustainable fisheries sector (including all components of the fisheries supply chain like catching, processing and distribution) which is geographically distributed and has links to the wider African market, also by mobilizing other funding (development cooperation, member states, etc).

If Mauritania makes use of their expertise, this should count towards a preferential position in terms of access to waters and markets over other third country fleets. This has the potential to serve the wish of the EU and its industry to contribute even more strongly to food security on the African continent.

However, Mauritania needs to make clearer how it intends to attract investments and cooperation from the EU industry.

Also, it is still unclear what the concrete, quantitative goals are for the development of a national fleet.

Make sure it allows consistent reduction of the fishing effort in alignment with the scientific advice while increasing the benefits for the nationals (cf past experience with the octopus)
Also monitor the development of the national/local fleet in order to properly assess the results of the management plan.

Last, local development should in any case focus on sufficient access for larger vessels in ports and on the availability of modern and large cold stores, with sufficient technical support and materials (forklifts and other unloading equipment, packaging materials) and experienced personnel. The lack thereof pushes EU freezer-trawlers to land in Las Palmas and elsewhere.

Employment onboard EU vessels

The EU pelagic fleet continues to be open to taking on board local crew, as it is important to provide valuable employment opportunities to SFPAs partner countries. However, a vessel must at all times be productive and above all safe. Therefore, it is necessary to manage the fishing vessel responsibly and effectively, and the requirements regarding crew from the partner country must always take this into account. Some EU Member States have implemented international conventions, like IMO STCW-F and ILO C.188 Work in Fishing Convention, into national legislation. One of the requirements based on the STCW-F is for all fishing vessel personnel to be in the possession of the certificate basic safety training (STCW-F, Chapter III).

The rate of Mauritanian crews is below the expectations of the Mauritanian authorities, particularly in the coastal fishing segment, notably on Turkish chartered vessels which do not systematically embark Mauritanian crews, yet one of the regulatory conditions of bareboat chartering.



Non-discrimination: same requirements should apply to all flags

It is necessary that Mauritania providing crew members working on EU vessels comply with the requirements imposed by crew legislation of the Member State concerned³.

Fisheries management

Quota allocation

Setting up in motion a process for **the repartition of the TACs in quotas amongst the** coastal states involved, based on various parameters including historical catches over a long period, and sustainability criteria including giving a priority for those fishing for human consumption. **Transparency about who gets access to these resources**, in line with the requirements from the FiTI, an initiative Mauritania is party of, is also important to promote compliance and encourage sustainability.

LDAC recalls that article 3 paragraph 3 of the SFPA EU-Mauritania states that “In the interest of transparency, Mauritania undertakes to make public and exchange information relating to any agreement authorising foreign vessels in the fishing zone and the fishing effort resulting from those agreements, in particular the number of fishing authorisations issued, the catches reported and the authorised fishing zones”.

Access management

The LDAC welcomes the measures proposed in terms of zoning and re-categorisation of some fleets, like the powerful 40 meters long seiners of Turkish origin, or Chinese trawlers that are, until now, considered as coastal vessels. We also welcome the development of small, locally built, seiners that would fish for human consumption, provided this does not increase the total fishing effort. To avoid this, the setting up of quotas by fleet is key.

For the allocation of such reduced access, we suggest to take into account not only historical catches but also other criteria, like prioritizing the access for those who fish most sustainably and contribute most to local development and food security (for example, giving priority to those who fish for human consumption).

The EU industry considers Mauritania should honour without delay the agreement to (re-) expand the pelagic fishing zone for EU vessels as a consequence of the management plan being put in place.

Monitoring Control and Surveillance

³ Vid. LDAC advice on « The Social Dimension of Sustainable Fisheries Partnership Agreements (SFPAs) between the European Union and Third Countries »

https://ldac.eu/images/EN_LDAC_Advice_Policy_Recommendations_Social_Clause_SFPAs_27May2022.pdf



The compliance of all operators with all measures is also essential. To be tackled, this **challenge of compliance demands reinforced capacity** (including well-trained, well-paid inspectors), something which could be supported by the EU (sectoral support, development aid) and Member States.

Compliance will be crucial to the success of the management plan, and therefore the LDAC would like to know more about intended monitoring, control and surveillance, as well as enforcement. The challenges of good governance include switching off location-transmitting devices while fishing outside zone limits and registering fish caught by night outside Mauritanian waters as catches under EU-Mauritania quota. Other specific issues are the monitoring of in- and output of fish meal factories and how flags of convenience are dealt with. A good compliance record will support trustworthy data, to the benefit of catch and scientific advice.

The EU must ensure that Mauritania commits to better financial governance and in particular the strengthening of transparency both at the level of institutions and at the level of the private sector⁴ as well as the improvement of the business climate, to encourage investment by European operators

⁴ Harmonization of tax regimes and improvement of other elements of the business environment for the pelagic processing industry intended for human consumption (single administrative window, incentive taxation depending on the destination of the products, securing of supplies, place of financing system of value chain based on the contract farming model), whether for national, sub-regional or international markets;



LDAC Recommendations:

LDAC considers essential to prioritize what are the key measures that should be at the heart of its implementation and therefore proposes the following main recommendations:

- **The setting-up of a TACs and quota system for the various small pelagic species at regional level which shall be based on adopting a precautionary approach** based upon best scientific advice. This supposed better data collection, increased observer capacity (human and/or electronic) as part of a robust MCS system, and collaboration with neighbouring states concerned with relation to the adoption, implementation and enforcement of such a system.
- Setting up in motion a process for **the repartition of the TACs in quotas amongst the** coastal states involved, based on various parameters including historical catches over a long period, and sustainability criteria including giving a priority for those fishing for human consumption.
- Ensuring meaningful consultation of stakeholders of both parties, namely coastal communities, EU industry and civil society as a general principle. In the case of LDAC, the EC should consult the LDAC on a systematic manner in advance of joint committees. In the case of third countries' stakeholders, the EC should support local initiatives that strive to ensure meaningful participation from local stakeholders in particular coastal communities.
- The EC should reiterate the importance of sufficient access for larger vessels in ports and on the availability of modern and large cold stores, with sufficient technical support and materials (forklifts and other unloading equipment, packaging materials) and experienced personnel.



Fisheries management measures for EU vessels targeting hake

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The EU longline fleet fishing demersal in the Mauritanian EEZ classified as Category 3 (demersal species other than hake), whose main objective is Brama Brama, has experienced a significant reduction in catches and landings since recent years, due to the increased activity of EU and non-EU fleets, especially Russian and Chinese vessels.

However, on certain occasions hake can be caught as by-catch by our Category 3 vessels in a small percentage.

Although a recent IEO scientific evaluation (not yet published) seems to show an overexploited stock of hake (also Brama Brama), the resource continues to be exploited.

The LDAC would like to see a more consistent and sustainable approach with all fleets, in the hope of rebuilding stocks and achieving good biomass figures. In this sense, once the stock improves and it is possible to increase the TAC, all fishing categories should be taken into account, including an increase in the by-catch percentage for Category 3.

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Important issue to be dealt in the discussion within the mixed committee EU – Mauritania
Assuming on an equal footing throughout fleets either the reduction or increase of fishing opportunities for demersal species.

Communication to fisheries operators

It may have happened in the past that a fishing zone was closed but the communication of this closure was only sent to the EU afterwards.

Thus, EU vessels may have found themselves in breach of the law by fishing in this area, without having been informed of the closure.

Cohabitation in fishing areas

EU fishing operators are facing difficulties in sharing fishing areas with other fleets from Russia, China or Turkey. As mentioned in the previous paragraph, it is likely that stocks are decreasing due to the greater effort of these large and powerful fleets. They are very large vessels compared with EU “smaller boats”

In the case of big trawlers, they can switch to other species as for example octopus at the coast if their yields fall, as other fishing option. Something that the EU “smaller boats” cannot do.



LDAC Recommendations:

- The LDAC would like to see a more consistent and sustainable approach and better management measures on all fleets.
- The LDAC requests that communication be improved so that operators are kept informed in advance of new management measures taken by the Republic of Mauritania (RIM) government.
- The LDAC supports the search for a cohabitation solution to allow the parallel activity of the different fleets without harming the EU demersal fleet composed of “smaller boats”.

Others comments on Mauritanian SFPA

Vessel's limitation of category 1

The vessels allowed to fish for crustacean in the Mauritanian EEZ classified as Category 1 are limited to 15 vessels. They were a limit of 24 vessels in the previous agreement. This reduction is aligned with the past activity of that fleet. At the same time, it was agreed that the two first years of the agreement should be used to better evaluate crustacean resources in order to better manage the stocks. For now, if the number of vessels is limited to 15 vessels, the effort deployed by the 15 licenced vessels will represent 10 vessels on a yearly average for 2022. Indeed, the vessels haven't been licenced during all the year.

So, to better gather information, it could be considered to manage the number of vessels by effort deployed rather than by number of authorised vessels.

Waiting for berthing at the port

Some LDAC members have made some comments on the problem of waiting for the container ships to dock in the port of Nouadhibou, forcing a last-minute change in the unloading forecasts for some fishing vessels. In fact, recently, the overland route has been used to send products by truck, with the risk relating to the crossing of the border.

Derogation for leaving fishing zone

In some few cases, a vessel should be able to leave the Mauritanian fishing zone with catches on board and land it in a third country in order to avoid waste time on transfers when it is to manage some important repairs. It could subsequently present the corresponding invoice to justify the fact.



Authorisation of experimental campaign for a change of fishing zone for category 2a

The fishing opportunities under category 2a of the current EU-Mauritania Fisheries Protocol include hake as the main target species and squid and cuttlefish as secondary target species. The two secondary target species are in very good biological health, and according to IMROP and Joint Scientific Committee reports are underexploited. The low catches of squid and cuttlefish are related to the delimitation of the fishing zone established in the Protocol's datasheet.

For those reasons, the LDAC industry members requests the approval by the Joint Committee of the proposal for an experimental campaign to analyse the feasibility of a change of fishing zone to allow the capture of the other two target species (squid and cuttlefish) which currently have a zero-catch level, within the framework of category 2a. This experimental campaign, designed by the IEO, with the participation of Spanish scientists and IMROP, will verify that with a modification of the fishing zone to allow the capture of squid and cuttlefish, there are no interactions with other types of fishing. It would be fully funded by OP ANACEF within its Production and Marketing Plan for the year 2023. In case of modification in the Protocol's datasheet, the new fishing zone shouldn't lead to a competition, either on zone or on the fisheries, with the Mauritanian artisanal sector and shouldn't provoke negative impact on the coastal environment (gears and fishing methods used).

Technical conditions of the Protocol to the Category 2a datasheet

Since category 2a is a fishing category similar to category 2, and since hake is the target species, the LDAC industry members considers that the 5% by-catch rate for crustaceans should also be included in category 2a datasheet of Appendix 2 of the protocol.

Joint fishing ventures' unfair situation

In the constitution of a joint fishing company in the Islamic Republic of Mauritania, the foreign investor must respect the investment code in its entirety. But, the LDAC is aware that there is a tolerance towards countries such as China which contrasts with the scrupulous requirements applied to those coming from EU Members States. For example, the minimum participation of local investor is not respected, nor the obligations regarding the embarkation of Mauritanian crew members (even if they do not want to embark on Chinese vessels flying the Mauritanian flag, commanded by Chinese officers).

As the SFPA contains an article promoting the constitution of joint ventures, the LDAC therefore wants to put this issue forward for the next Joint Committee.