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**WWF Submission to the 34th Plenary Session of the
General Fisheries Commission for the Mediterranean**

Athens, April 14-17, 2010

The proposal for a Fisheries Restricted Area (FRA) in the Eastern Gulf of Lions {(42°40'N, 4°20'E), (42°40'N, 5°00'E), (43°00'N, 4°20'E), (43°00'N, 5°00'E)} was put forward to the GFCM at its 33rd meeting in Tunis, Tunisia in March 2009, with the proposed management measure by the SAC of prohibiting any kind of demersal fishing in the FRA, towed or not, including trawl, bottom longline, bottom nets and traps, to protect a high concentration of mature individuals of several commercially important bottom-dwelling species in the area. The FRA was adopted by the GFCM, under Recommendation GFCM/33/2009/1, but with the weaker management measure of simply freezing the fishing effort in the area at the level applied in 2008.

To implement this latter management measure, point (2) of Recommendation GFCM/33/2009/1 obliged Members and cooperating non-Members of GFCM to communicate to the GFCM Executive Secretary no later than June 2009 the list of vessels that used towed nets, bottom and mid-water longlines, and bottom-set nets in the area of the FRA in 2008. As revealed at the 10th meeting of the Scientific Advisory Committee of the GFCM in Budva, Montenegro in January 2010, however, such a list of vessels had not been received by the GFCM Executive Secretariat. Furthermore, concern was raised by the EU delegate over the validation process of the list, once received, stating that current EU legal instruments for positioning fishing activities at sea, i.e. VMS and logbook, don't allow for such a validation.

The current Recommendation GFCM/33/2009/1 can therefore be deemed dysfunctional. On the one level, there is a case of lack of compliance to the Recommendation, and on another, even if the list of vessels had been submitted, there are no available tools with which to verify it. WWF thus urges the Committee on Compliance of the GFCM to pay special attention to this important Recommendation this year, since the credibility of GFCM to efficiently manage fisheries in the Mediterranean is at stake

With these antecedents, WWF considers that in its present form Recommendation GFCM/33/2009/1 not only is not delivering any of the management goals related to the original advice from SAC, but it can be considered as paper law. This latter element, setting fisheries legislation with no effect whatsoever in the field, has plagued the management of Mediterranean fisheries for decades, and is to be avoided by all means if a new era of real rational fisheries management for the region is pursued. That's why WWF urges GFCM this year to modify Recommendation GFCM/33/2009/1 to revert to the measure originally proposed by the SAC last year: *to prohibit any kind of demersal fishing in the FRA, towed or not, including trawl, bottom longline, bottom nets and traps.*