



Dear Karmenu Vella, Commissioner for the Environment, Maritime Affairs and Fisheries

Dear João Aguiar Machado, Director-General for Maritime Affairs and Fisheries

Dear Ana Paula Vitorino, Minister of the Sea of the Portuguese Government

Dear Luis Planas, Minister of Agriculture, Fisheries and Food of the Spanish Government

Dear José Apolinário, Secretary of State of Fisheries of the Portuguese Government

Dear Alicia Villauriz, General Secretary of Fisheries of the Spanish Government

Lisbon and Madrid, July 23rd 2019

Subject: Iberian sardine, a tale of poor management

The 12 environmental non-governmental organizations (ENGOS) that sign this open letter have been closely following the developments of the management of the Iberian sardine stock (*Sardina pilchardus*) for almost a decade and have patiently waited for effective management measures, proportional to the serious and long-lasting state of depletion the stock has been in during this period. So far, the Portuguese and Spanish Administrations, with the oversight and consent of the European Commission (EC), have failed to deliver.

What we conclude:

- Scientific data show that the Iberian stock has been in a continuous declining pattern since the 1980s and that since 2009, it has been at unhealthy levels, below safe biological limits;
- The management measures taken so far are insufficient to ensure the recovery of the stock to healthy levels in an acceptable time frame.

What we demand:

- That this stock – due to its commercial importance, scientific assessment and long-lasting depletion – is managed in line with the objectives set out in the Common Fisheries Policy (CFP);
- The adoption of a recovery and long-term management plan, considered to be precautionary and in line with the CFP objective to maintain all stocks at sustainable levels, within a short time frame;
- The elaboration of peer-reviewed social and economic scientific evaluations that can be the basis of measures that allow the fleets that were once dependent of Iberian sardine to maintain or even increase their profitability, while allowing the stock to fully recover.

The ENGOs are convinced that if these conclusions are not assumed and if these demands are not met by the decision makers, the tale of mismanagement of the Iberian sardine will have further chapters. On the contrary, if our recommendations are followed (and the stock is given a true chance of recovery), the fisheries managers of both Member States and the European Commission have the opportunity to give this story a positive ending.

Specifically, the Iberian NGOs once again ask:

- a. **That the Iberian sardine stock is managed accordingly with the CFP**, specifically in line with article 2.2 that states that a precautionary approach should be applied *“to fisheries management, and shall aim to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield.”*;
- b. **That a Long Term Management Strategy that includes the recovery and the management of the Iberian Sardine stock is adopted.** This plan must be considered by the International Council for the Exploration of the Seas (ICES) to be precautionary and in line with the CFP objective to maintain all stocks at sustainable levels. The adoption of such a plan is in fact what is being done at EU level for several other important pelagic stocks.
- c. **That the most up-to-date recommendations of the ICES are followed.** Scientific advice is the basis for a sustainable management and the scientific data provided by the national institutes - and paid by tax money - should be seriously taken into account when setting fishing opportunities;
- d. **That immediate efforts are put in place for the financial, human and institutional capacity building of the Iberian institutes** that contribute to ICES working groups and other marine research institutions in order to improve their capacity to collect and process scientific data that could serve the countries' fisheries management interests;
- e. **An urgent and serious investment in finding durable solutions for the fisheries sector, which go beyond granting subsidies for closing the fishing activity.** There are other small

pelagic species on the Iberian coast that are being well managed, such as horse mackerel. This species is undervalued by the consumers and the TAC has even remained to be used fully. Thus, one of the solutions for the sector may be to encourage the consumption of horse mackerel and other species captured by the national fleets that are in good condition. However, it is necessary to keep these stocks well monitored from a scientific point of view;

f. **Measures to diversify the activity are implemented and that professionals redirect to activities that do not cause other negative impacts** on ecosystems, bringing benefits to local economies and not being an additional expense for the Member States (e.g.: Tourism). It is fundamental that PO's and operators create alternative sources of income complementary to fisheries;

g. **That the sector does not depend so highly on a single species**, as it is important that, in the future, the sector does not focus its socio-economic dependence on one species, especially when it is a small pelagic that is influenced by factors that can hardly be controlled or managed;

h. **That socio-economic studies that substantiate the fleet's high dependence on the resource are carried out.**

What is the story?

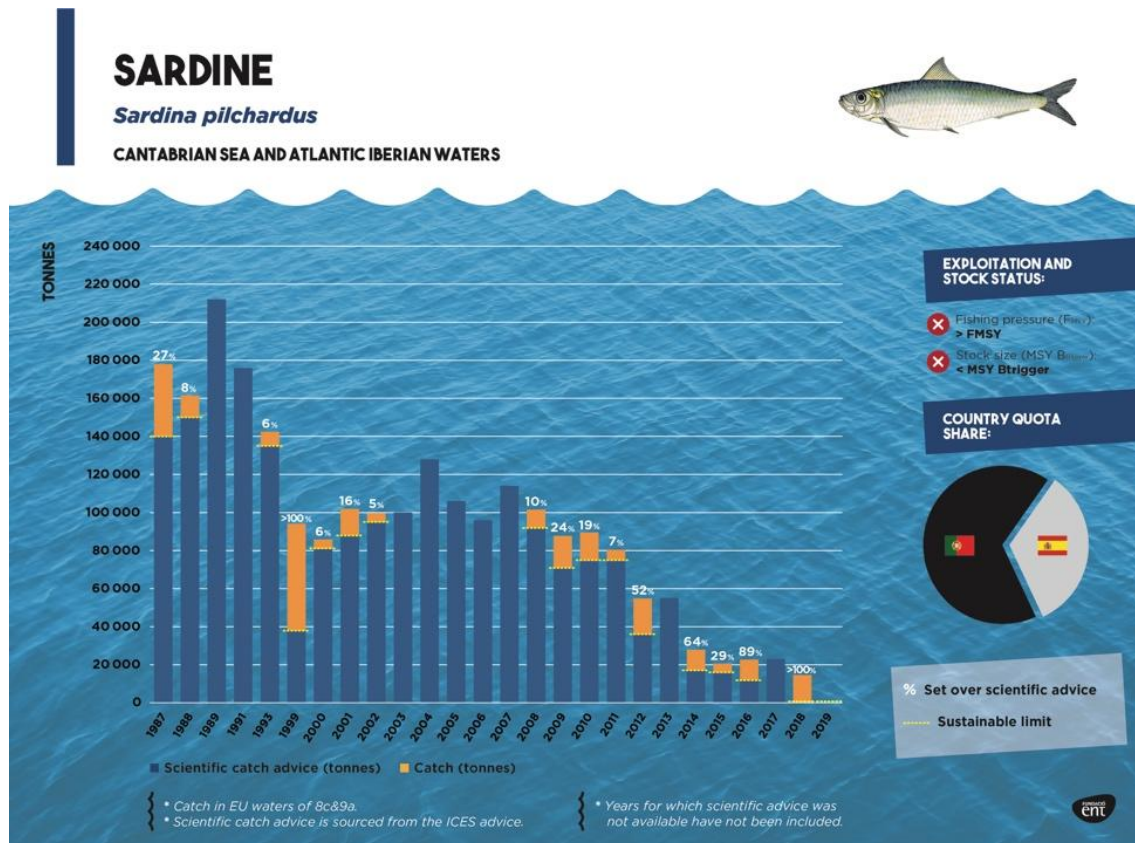


Figure 1 – Chart produced by Fundació ENT showing the sustainable limits advised by scientists for the Iberian sardine stock and the % of tonnes set over the scientific advice (when available) in a given year

The chart shows that, for this stock, the scientific advice has been exceeded 8 times in the last 10 years. Politicians and managers consistently disregard scientific advice as the biomass has been globally decreasing. The biomass is below B_{lim} (reference point of the safe biological limit) since 2009, where it remained ever since. The most recent ICES advice clearly states that the stock “has stabilized to a historical low since 2012”¹.

The advice also shows that the “biomass of 1+ fish is less than half of B_{lim} since 2011, and thus recruitment is considered to be impaired”, also adding that “recruitment has been at the lowest historical level since 2006, and in 2017 was estimated as the lowest in the time-series”. For the NGOs, it is clear – at least until 2018, the stock was facing unparalleled recruitment and biomass low levels.

¹ <http://ices.dk/sites/pub/Publication%20Reports/Advice/2018/2018/pil.27.8c9a.pdf>

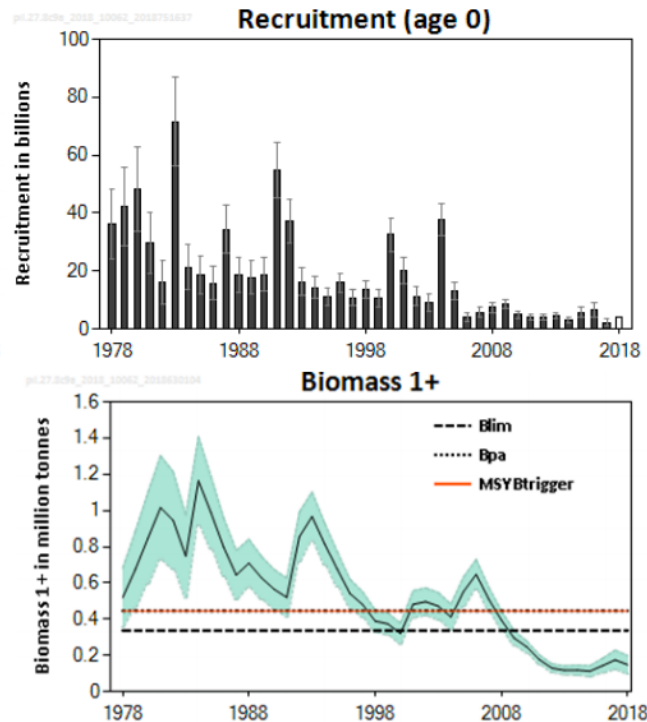


Figure 2 – Time series graphics of recruitment and biomass of age of 1+ (published in ICES advice of July 13th 2018²)

Reading between the lines (and beyond)

The NGOs believe that a good resources management necessarily implies taking difficult decisions that, in the end, contribute to the effective resolution of problems, promoting long-lasting benefits and, more important, to the largest number of people. It is very important that the Governments face this problem with a medium to long-term perspective, considering that the Iberian sardine – as all marine resources – is a public resource that should be managed to bring benefits for most people and not only to a small percentage. It is urgent that fishing quotas are set accordingly to the scientific advices and that they are followed by serious measures of sector re-structuration and heavy investment in scientific research. For a long time now, the NGOs have been defending some wider principles, such as:

1. Science Based Management

It is not possible to properly manage fisheries without a thorough and up-to-date knowledge of the state of ecosystems and the populations of the organisms on which fisheries depend. It is therefore essential to support scientific research related to fisheries and to establish appropriate mechanisms to properly and timely integrate new data and information as they become available. Traditional knowledge also plays a key role in the scientific process and should not be ignored.

² <http://ices.dk/sites/pub/Publication%20Reports/Advice/2018/2018/pil.27.8c9a.pdf>

2. Effective Control of Fishing Activities

Effective control measures are a fundamental part of a good management system. That is why Governments should increase their effort in fighting illegal practices so that they do not jeopardize the entire management effort. It is essential to ensure effective monitoring and control, which must be done at different levels of decision-making and regulation, and users should also be involved in this process.

What will come next?

For the Iberian NGOs, the issues related to the (mis)management of Iberian sardine are generated simply due to the fact that the stock is not managed under the requirements of the CFP. Why this continues to happen, under the supervision of the European Commission, is something that the NGOs cannot understand. This stock meets every requirement for it to be managed under the TAC and quota system: 1) it is a stock with enormous commercial importance, captured by several fleets of Portugal and Spain, 2) the species has a minimum conservation size (11cm) and 3) it is a stock very well assessed and systematically followed from the scientific point of view. It is totally incomprehensible for the NGOs why are the civil servants deferring management measures that would be and are applied to similar stocks in the same circumstances in the European Union. Not applying the management objectives of the CFP to the Iberian sardine stock, and therefore failing at meeting the CFP's objective of having every commercial stock at sustainable levels in 2020, is a violation of the Law and the case should be treated as such. It is important to remember that B_{MSY} , the biomass that corresponds to the maximum sustainable yield, is the reference point against which the stocks are to be managed according to the CFP. That is why it is inexplicable for the NGOs that the Member States have submitted a recovery plan that is inconsistent with the objectives of the CFP to fish at sustainable levels by 2020, and will not deliver a full recovery of the fishery. Portugal and Spain submitted to the EC a recovery plan with very unambitious target that will not even result in the recovery of the stock (the proposed plan's objective is "*a probability $\geq 90\%$ that the stock biomass will be equal or above 80% of B_{lim} by 2023*"). The fulfilment of the management plan would only allow to keep the biomass of the Iberian sardine above safe biological limits by 2023, which is far below the maximum sustainable yield reference point that is the one considered to be sustainable and mandatory according to the CFP.

The NGOs ask for a strong investment in finding alternatives that will help the sector when dealing with this problem, but it is also in the consumers' field of action the responsibility to change habits. It is very important that the consumers diversify their fish-eating habits so that this traditional species gets its best chance at recovery.

In conclusion, every stakeholder – Commission, Governments, fishermen, researchers and the civil society – must work together to bring the Iberian sardine stock to sustainable levels as soon as possible, otherwise we will risk the existence of one of the most important stocks for Portugal and Spain for a very long period.