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Translation from Bulgarian
КОНСУЛТАТИВЕН СЪВЕТ ЗА ЧЕРНО МОРЕ /КСЧМ/
CONSILIUL CONSULTATIV PENTRU MAREA NEAGRA

An association registered in the Register
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To: DG Directorate-General for Maritime Affairs and Fisheries
In attention: Mr Joao Aguiar Machado

To the Minister of Agriculture, Food & Forestry of Bulgaria

To the: Minister for Agriculture and Rural Development of Romania

RECOMMENDATION

Re.: The management of turbot stocks in 2020 and 2021.

The Black Sea Advisory Council would like to make the following recommendations:

1. The turbot stock in the Black Sea should be treated as one single stock/resource.
2. Uniform rules and measures should be introduced for all fishing vessels operating in the Black Sea – both small boats of small-scale fisheries and ships. The said measures should also be binding to countries that are not EU members but operate in the Black Sea.
3. The quotas for the catch of turbot for the Republic of Bulgaria and the Republic of Romania should be discontinued for a period of 2 /two/ years, and in this period only monitored fishing vessels which meet all the requirements for obtaining a license for turbot fishing, should be allowed turbot fishing.

Grounds for the demand for discontinuing turbot quotas for two successive years:

1. It is necessary that the actual quantities of the catches should come in the open. The Governments and the EC should have an idea of the actual catches by vessels/boats without licenses, without a quota, which land in unregulated places, without any monitoring and control;
2. There is evidence that the catches and landing of turbot in unregulated places by boats without quotas are beyond the scope for control.

We propose the following new and more restrictive conservation measures:

1. All vessels holding permits for turbot fishing should be subjected to relevant monitoring, as are vessels over 12 meters in length;
2. All boats without permits for turbot fishing but operating as accompanying fishing boats /in Romania/ or boats with permits for other kinds of fishing or tourist boats /in Bulgaria/ should also be subjected to monitoring;

3. A sufficient number of fishing ports and boat shelters should be designated by the respective minister in the member-state as places for landing turbot for the Republic of Bulgaria and the Republic of Romania;
4. It should be regulated that the fishing and landing should be done during daytime only;
5. In every port there should be an inspector appointed to monitor the landing, which should be performed in the presence of the said inspector only;
6. The reporting should be done by electronic means, at least two hours prior to the arrival of the vessel in the port and the landing of turbot;
7. For each fishing vessel catching turbot using passive fishing gear, the number of the permitted fishing devices and the individual marking/trademark of each net should be specified in the permit. For fishing boats 6 meters in length – 10 nets, 100 meters long each marked by NAFA, AMPA with an individual marking and number; for boats from 6 to 10 meters in length – 20 nets, and for boats 10 to 12 meters in length – 30 nets;
8. The fishing vessels of small-scale fisheries should be granted up to 2-3 miles of permitted area of operation;
9. An extensive dialogue should be initiated with all stakeholders, and control methods should be developed, involving not only the responsible institutions but also municipal councils, associations, the general public and NGOs;
10. The material base for air, water, shore and land control to be funded in accordance with the new requirements;
11. Funding should be provided for scientific research so as to establish the actual turbot stocks, taking into account the actual catches for two successive years;
12. There have been reports of sales of undersized turbot in restaurants and shops, which means that turbot is caught using nets with meshes smaller than the statutory 450mm. Culprits should be banned from turbot fishing (by revoking the permits of the fishing vessels) for a period of 3 years.

Expected results:

1. The actual quantities of turbot caught, landed and sold in Bulgaria and Romania will be established.
2. It will be established how many and which fishing vessels catch turbot.
3. The sale of turbot from unregulated catches in hotels and restaurants will be discontinued.
4. The catching and sale of undersized turbot will be discontinued.
5. We will contribute to the conservation of the dolphin population.
6. We will establish if the resource is sustainable or endangered, regardless of the fact that the actual catches exceed the reported ones.

Measures to be taken after 2020-2021

- If turbot stocks prove to be sustainable and stable, the quotas should be suspended for at least 3 years;

Special opinion expressed by: Mare Nostrum NGO and NGO "Friends of the Black Sea" – part of other interest group- Mare Nostrum does not support the specific recommendation related to discontinuing/suspension of the quota, due to the fact that is not backed up by scientific research. Also, it considers the fact that such an elimination of the quota will put a higher pressure on the ecosystem, having negative impact, not only on the turbot stocks, but also on other species – marine mammals.)

Sincerely,
Yordan Gospodinov
Chairman of the BISAC

