

Series on Mauritania #3

The new EU-Mauritania agreement: towards a sustainable management of small pelagics in West Africa?

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In this third article in the series on fisheries in Mauritania, the authors review the state of overexploitation of small pelagic stocks, look at the ways the EU-Mauritania Sustainable Fisheries Partnership Agreement (SFPA) seeks to address the issue and come back to the demand of several stakeholders for a regional fisheries management organisation for shared small pelagic stocks.

1. Overview

At the end of July 2021, the European Commission concluded the negotiations for a new sustainable fisheries partnership agreement (SFPA) with Mauritania for a period of 6 years, tacitly renewable. On the same day, the protocol of this new agreement was signed. It entered into provisional application on 16 November 2021.

In the meantime, the texts are under discussion in the European Parliament, which must give its approval or not. At the end of October, the Parliament's Fisheries Committee had a first look at the agreement and its protocol. Several MEPs expressed concern about the social and environmental damage caused by the overexploitation of small pelagic fish, in particular the processing of sardinella into fish meal and fish oil.

These stocks are indeed strategic, not only for Mauritians, but also for the food security of the whole West African region. The sustainable management of these

resources and their use for food security should therefore be at the heart of the EU-Mauritania SFPA. Is this the case?

2. Uncoordinated resource sharing has led to overexploitation

Small pelagic fish in West Africa include sardines, round and flat sardinella, ethmalose, anchovies, mackerel and horse mackerel. Sardinella in particular are traditionally consumed by the people of the region and are an affordable source of animal protein, micronutrients and fatty acids.

Small pelagic fish move between the Exclusive Economic Zones (EEZ) of several West African states:¹ Morocco, Mauritania, Senegal, Gambia and Guinea Bissau. The scientific data available have shown for years that sardinella is overexploited. The absence of a concerted approach between the countries concerned for the management and conservation of these resources is therefore a real threat to regional food security.

While in Senegal, sardinella is mainly exploited by artisanal fishing, in Mauritania small pelagics are exploited by both artisanal, coastal and industrial fishing. For industrial fishing, there are two distinct exploitation regimes: national boats landing in Mauritania, and foreign boats that operate either under a fishing agreement (as with the EU) or under free licences. A PRCM report notes that, in the latter case, catch volumes are not limited, and vessels do not have to land their catches in Mauritanian ports, making this activity difficult to control.²

Scientists confirm that since 2007, round and flat sardinella are overexploited.³ Senegalese fishermen's organisations agree. They alerted the public in 2018 to the fact that their catches of sardinella had decreased catastrophically for several years.⁴ This scarcity has caused an increase in the price of this "poor man's fish", which has considerably limited access to these fish not only for women processors, but also for consumers in the region.

3. Fishmeal, an aggravating phenomenon

Several experts, artisanal fishing communities and civil society point to the development of the fishmeal and fish oil industry as an aggravating factor in the overexploitation of these species.

Since 2010, the fishmeal and fish oil industry has grown exponentially in Mauritania and, more recently, throughout the region, fuelled by an increased global demand for

¹ See more information at: <https://www.cffacape.org/fishmeal-mauritania>

² DEME, Moustapha et al., « Importance économique, sociale et écologique des petits pélagiques au Sénégal, en Mauritanie et en Guinée Bissau », Rapport d'étude, PRCM, August 2019, page 20. Available in French at: <https://mava-foundation.org/wp-content/uploads/2020/02/Rapport-detude-sur-la-valeur-des-petits-p%C3%A9lagiques-PRCM-201908-Web.pdf>

³ *Ibid.*, p. 17.

⁴ GOREZ, Béatrice, "More aquaculture to feed the world? Not at the expense of African fishing communities", Rural 21: Tailwind for sustainable artisanal fisheries, vol. 55 n° 4/2021, pages 16-17. This article was translated into French and published in both languages on CFFA-CAPE website on 30 November 2021. See: <https://www.cffacape.org/publications-blog/more-aquaculture-to-feed-the-world-not-at-the-expense-of-african-fishing-communities>

these products for livestock farming and especially intensive aquaculture. Intensive aquaculture of carnivorous species, such as salmon or scampi, requires large quantities of fishmeal and fish oil, produced from small pelagics and increasingly sourced from West Africa.⁵ According to Greenpeace, Mauritania's fishmeal exports increased by 16% in 2020.⁶

Since 2016, the Senegalese pirogues chartered by Mauritians to catch small pelagics for the fishmeal factories have been replaced by Turkish seiners. Mauritania's first report under the Fisheries Industry Transparency Initiative (FiTI) - using 2018 data - also identified several Chinese vessels targeting small pelagics to produce fishmeal.⁷

The factories most often use fresh fish to make fishmeal, fish that might otherwise be used for human consumption. In an article, Ad Corten, an expert scientist on small pelagic fisheries in West Africa, explained that the Mauritanian government introduced measures in 2018 to limit the amount of sardinella processed into fishmeal and oil to 10,000 tonnes per factory.⁸ However, doubts remain about the effectiveness of these measures, particularly given the lack of control over the composition of the species used by the factories. Despite Mauritania's commitment to progressively reduce the production of fishmeal and fish oil, it must be noted that today the production of fishmeal has only increased.⁹

4. What is in the new SFPAs for small pelagics?

While the species of small pelagics targeted by the agreement remain the same - sardines, sardinella, horse mackerel, mackerel - there are changes to the fishing possibilities and to the fees for shipowners.¹⁰ The total allowable catch, which was previously 300,000 tonnes, is now 225,000 tonnes, although the number of vessels allowed at any one time remains at a maximum of 19 vessels.

This partly reflects the fact that, fishing further from the coast since the last agreement, European fleets have less access to small pelagic resources, particularly sardinella. Shipowners' fees are also changing: the price was previously set at €123 per tonne for all species; it now varies according to the species fished, ranging from €75 per tonne for sardines or sardinella to €140 per tonne for horse mackerel.

⁵ GOREZ, Béatrice, "The rich man's fish feeds on the poor man's sardinella", CFFA-CAPE website, 6 July 2021. Available at: <https://www.cffacape.org/publications-blog/the-rich-mans-fish-feeds-on-the-poor-mans-sardinella>

⁶ GREENPEACE AFRICA, CHANGING MARKETS, "Feeding a monster: How European aquaculture and animalfeed industries are stealing food from West African communities", June 2021. Available at: <http://changingmarkets.org/wpcontent/uploads/2021/05/Feeding-a-Monster-EN-low-res.pdf>

⁷ PHILIPPE, Joëlle, "Transparency: Mauritania improves its score, but is still far from the goal", CFFA-CAPE website, 13 October 2021. Available at: <https://www.cffacape.org/publications-blog/transparency-mauritania-improves-its-score-but-is-still-far-from-the-goal>

⁸ CORTEN, Ad, "Mauritania: How the EU agreement can be used to improve fisheries management", CFFA-CAPE website, 26 February 2020. Available at: <https://www.cffacape.org/publications-blog/how-the-eu-mauritania-fisheries-agreement-can-be-used-to-improve-fisheries-management>

⁹ GOREZ, Béatrice, "Mauritania pledged to eliminate fishmeal production by 2020. Today, it has tripled", CFFA-CAPE website, 16 October 2020. Available at: <https://www.cffacape.org/news-blog/mauritania-pledged-to-eliminate-fishmeal-production-by-2020-today-it-has-tripled?rq=tripled>

¹⁰ All the documents related to the SFPAs can be found at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L:2021:439:TOC>

A) FISHING CLOSER TO THE COAST? ONLY IF MANAGEMENT IS SUSTAINABLE

An important change concerns the zoning for small pelagic fishing by European trawlers. In April 2020, Mauritania modified the small pelagic fishing zone,¹¹ allowing foreign trawler fleets to come 5 miles closer to the coast, from 20 miles to 15 miles. As a reminder, in 2012, it was the European Union that insisted on setting this limit at 20 miles, in order to protect sardinella stocks, which are mainly found in the area closer to the coast. So, does the change from 20 to 15 miles mean that overfished sardinella will again come under greater pressure from foreign trawlers, such as those from the EU?

What is proposed in the new agreement is rather precautionary. Indeed, it is requested that "*no later than six months from the date of application of the Protocol, Mauritania adopt a plan for the sustainable management of small pelagics*". This plan must be notified to the EU at least one month before its implementation date. Until this plan is adopted, precaution is the order of the day, and the EU pelagic trawler fleet will only be able to fish beyond 20 miles, as was the case in the previous protocols.

Already, at the last SFPA Joint Scientific Committee meeting in 2021,¹² scientists stressed the importance of sustainable management and supported proposals to reduce fishing mortality on sardinella within the 15-mile limit, by implementing measures such as banning the use of both species of sardinella for fishmeal, reducing the size of fishing gear used by coastal vessels - today, 40-metre Turkish seiners are considered as coastal fishing vessels - and introducing quotas to limit catches by the various fleets.

As a reminder, a management plan for the sardinella fishery¹³ had already been drawn up by Mauritania in 2013-2014, based on the promotion of concerted management of the resource at sub-regional level, and less centralised management at national level, building on co-management initiatives and existing local consultation bodies. This plan has so far not been implemented.

B) SUPPORT FOR RESEARCH

Many had deplored the fact that research on the state of small pelagic resources had not received much attention in the previous agreement and protocols, pointing out, for example, that the glaring lack of sampling prevented a reliable assessment of the state of these stocks.¹⁴ None of the money paid through sectoral support had been used for research, except for the maintenance of the research vessel Al Awam. Moreover, Lithuanian and Latvian shipowners in the European fleet regularly

¹¹ A pdf copy of the ministerial circular is available on the electronic version of this policy brief on the CFFA-CAPE website: <https://static1.squarespace.com/static/5d402069d36563000151fa5b/t/61e7d0846d642d23472b167a/1642582151600/circulaire+Min+changement+de+zone+PP+%281%29.pdf>

¹² "Report of the 2021 meeting of the Joint Scientific Committee to the EU-Mauritania Fisheries Partnership Agreement", Directorate-General for Maritime Affairs and Fisheries, 5 March 2021. Available at: https://ec.europa.eu/oceans-and-fisheries/publications/report-2021-meeting-joint-scientific-committee-eu-mauritania-fisheries-partnership-agreement_en

¹³ A pdf copy of this plan is available on the electronic version of this policy brief on the CFFA-CAPE website: <https://static1.squarespace.com/static/5d402069d36563000151fa5b/t/61e7d0bf4edda6472789705/1642582211598/Management+plan+Mauritanie+2013+final.pdf>

¹⁴ CORTEN, Ad, *Ibid.*

refused to take scientific observers on board, without any sanctions being taken against them.¹⁵

Improvements on this point were therefore long overdue.¹⁶ In the new agreement, more attention is paid to research, including on small pelagics, with more precise arrangements for taking on board scientific observers, the data to be collected and the sampling of catches.

The text stipulates that "*the presence of two Mauritanian scientific observers is compulsory on board all pelagic trawler vessels*", as they must both measure fish (below deck) and monitor by-catches (on deck) at the same time. The text specifies that "*if full observer coverage of all tides is not feasible, all pelagic trawlers are required to carry a team of two scientific observers, at least at the request of IMROP.*" Another important clarification is that "*if a trawler refuses to take on board scientific observers, it will not be allowed to leave port.*" This is a welcome measure given the previous failings of Baltic shipowners. This partly meets a request from local artisanal fishermen to "*make the renewal of these vessels' licences conditional on the taking on board of an observer.*"¹⁷ Making access to the fishing zone conditional on the mandatory embarkation of observers is also in line with the requirements for data collection and transmission set out in the EU Data Collection Regulation (2017/1004).¹⁸

In addition to on-board observations, "*shore-based observations will also be strengthened through more regular and increased sampling.*" This is also a welcome development. In the new agreement, one sample per month and per landing site will be carried out. The minimum sampling rate set is one sample (minimum of 100 individuals) per 1,000 tonnes of catch, which is the benchmark advocated by CECAF.¹⁹ This will require that sampling of landings at fishmeal plants is greatly increased, and that catches from pelagic trawlers are properly sampled by at-sea observers.

C) SUPPORT FOR LOCAL CONSUMPTION

A final aspect that remains unchanged and is important for food security is the fact that shipowners will continue to land 2% of their catches "*for the policy of distributing fish to needy populations.*" The catches will be handed over to the National Fish Distribution Company of Mauritania. This measure was a great success in the previous agreement as it allowed local fish consumption to rise from 4 to 12 kg/person/year in just a few years.

¹⁵ GOREZ Béatrice, "Cameroon IUU yellow card: The EU should also sanction European companies hiding behind this country's flag", CFFA-CAPE website, 11 March 2021. Available at: <https://www.cffacape.org/publications-blog/cameroon-iuu-yellow-card-the-eu-should-also-sanction-european-fishing-companies-hiding-behind-this-countrys-flag>

¹⁶ "Improving scientific observer coverage in mixed Fisheries Agreements in West Africa", Joint CFFA-CAPE, WWF and BirdLife Europe & Central Asia position paper, published on the CFFA-CAPE website on 8 December 2020. Available at: <https://www.cffacape.org/publications-blog/improving-scientific-observer-coverage-and-data-collection-in-mixed-sustainable-fisheries-partnership-agreements-in-west-africa>

¹⁷ CFFA-CAPE, "Sustainable Fisheries Partnership Agreement negotiations between the EU and Mauritania: staying on course", 27 October 2020. Available at: <https://www.cffacape.org/publications-blog/sustainable-fisheries-partnership-agreement-negotiations-between-the-eu-and-mauritania-staying-on-course>

¹⁸ Regulation (EU) 2017/1004 of the European Parliament and of the Council of 17 May 2017 on the establishment of a Union framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the common fisheries policy and repealing Council Regulation (EC) No 199/2008, OJ L 157, 20.6.2017, p. 1–21. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017R1004>

¹⁹ FAO, "Report of the FAO Working Group on the Assessment of Small Pelagics off North West Africa", FIAF/ R1221, Nouadhibou, Mauritania, 22-27 May 2017, Rome, 2018. Available at: <https://www.fao.org/3/i8896b/i8896B.pdf>

A novelty in the text of the agreement proposed for approval by Parliament is that food security is also supported through sectoral support: axis 6 of the sectoral support intervention will be dedicated to infrastructures for the promotion of human consumption of fishery products.

5. A regional management organisation is indispensable

For the various stakeholders in the European Union, gathered in the Distant Water Fishing Advisory Council (LDAC), an RFMO for the management of small pelagics is indispensable in the West African region. In an opinion²⁰ issued in May 2021, the LDAC calls on the EU to "*support regional management efforts for shared resources in West Africa, including through its Sustainable Fisheries Partnership Agreements with countries in the region, as well as, in the longer term, the establishment of a Regional Fisheries Management Organisation (RFMO)*".

In the specific context of the EU-Mauritania SFPA negotiations, the LDAC suggested the following actions: to increase considerably the sampling of pelagic catches; to implement the FAO recommendations for the sustainable management of these resources (including the establishment of a management plan); to start consultations with neighbouring Senegal on the joint management of sardinella. In its response²¹ to this opinion, the European Commission explained its approach, which is to consider CECAF as the tool that should be in charge of the management of small pelagics in West Africa, and also gave the broad outlines of what is to be found in the proposed EU-Mauritania agreement: taking into account the scientific recommendations, drafting by Mauritania of a management plan.

On the issue of small pelagics, the proposed EU-Mauritania agreement currently under discussion in the European Parliament responds to a series of concerns of parliamentarians and Mauritanian and European civil society: adoption and implementation of a management plan for sardinella, better support for research (observations at sea and on land), support for the contribution of small pelagics to food security.

An important element in moving towards a concerted management of these resources is to encourage closer ties with Senegal, as well as with the various countries concerned by small pelagic stocks in the region. The European Union has bilateral sustainable fisheries partnership agreements with all these countries, and is therefore in a privileged position to encourage them to take joint conservation measures for these strategic resources, following the advice of the FAO working group, and for the benefit of local populations.

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²⁰ LDAC, "Promoting regional sustainable fisheries management for shared fisheries resources in West Africa", Opinion, R-04-21/WG4, May 2021. Available at:

https://ldac.eu/images/EN_LDAC_Opinion_Regional_Fisheries_Management_West_Africa_20May2021.pdf

²¹ The European Commission's response to the LDAC opinion is available at:

https://ldac.eu/images/EC_Reply_to_Advice_West_Africa_R-04-21-WG4_21June2021.pdf