



RECOMMENDATION OF LDAC

LDAC ADVICE ON REGIONAL EFFORTS IN WEST AFRICA TOWARDS SUSTAINABLE MANAGEMENT OF SMALL PELAGICS STOCKS

Date of adoption: 13 May 2025

Ref.: R-10-Ej.18 (2024-2025) / WG4

Context

The LDAC has worked on the topic of the management of small pelagics stocks in West Africa for several years. In 2021, it adopted an advice on *'Promoting regional sustainable fisheries management for shared fisheries resources in West Africa'*¹. In its response², the European Commission (EC) explained it considered the Fishery Committee for the Eastern Central Atlantic (CECAF) as the body that should oversee the management of small pelagics in West Africa. At the end of 2022, the LDAC made recommendations regarding the proposed multiannual management plan for small pelagics in Mauritania³. In its reply⁴, the EC insisted that transparency and non-discrimination remained top priorities when discussing this issue with partner countries.

Latest developments

The scientific report of the last **CECAF working group⁵ on the state of small pelagic resources off the coast of North-West Africa**, held in July 2024, shows that the situation of small pelagics in the region is alarming: five out of nine small pelagic stocks - sardine (in Area C), round sardinella, flat sardinella, Atlantic horse mackerel and ethmalose (*bonga*) - are overexploited. The report also highlights that sardinella stocks are in a critical situation, heavily overexploited and with very low biomass levels. Resources like sardinella and bonga make an essential contribution to food security in the region, and their critical situation has to be addressed as a matter of urgency.

For sardinellas, the CECAF Working Group report on small pelagic recommends:

- a substantial and immediate reduction in the fishing effort and mortality in the magnitude of a 60 percent reduction of the current fishing mortality.
- retaining a ban on the catch and use of sardinella species for fishmeal throughout the sub-region.

¹ https://ldac.eu/images/EN_LDAC_Opinion_Regional_Fisheries_Management_West_Africa_R-04-21.WG4.pdf

² https://ldac.eu/images/EC_Reply_to_Advice_West_Africa_R-04-21-WG4_21June2021.pdf

³ https://ldac.eu/images/Final_Advice_Mauritania-West_Africa_25-11-2022.pdf

⁴ https://ldac.eu/images/EC_Reply_LDAC_advice_on_Mauritania_Dec2022.pdf

⁵ <https://openknowledge.fao.org/server/api/core/bitstreams/17b960e7-5980-417f-8a45-021b1503d6cc/content>



- the need to develop and national development plans for the sustainable management of sardinella (including measures such as biological rest period, zoning, setting minimum sizes and capacity management), and to strengthen the collection of data throughout the sub-region to allow for more accurate stock assessment results. This would also improve the resilience of these resources in a context of climate change, which indeed is already affecting small pelagic resources, including their distribution and productivity in the region⁶.

The growing demand for fishmeal and fish oil (FMFO) has also contributed to the degradation of these fisheries, with profound social and economic impacts. The scarcity of the resources, fueled by FMFO factories, has significantly increased the price of small pelagic species, making them unaffordable for many local consumers. Having to go further at sea and for longer periods because of the lack of fish, local fishers cannot afford the additional costs of ice to maintain the quality of the fish and have no other choice but to sell to FMFO factories. In some cases, fish is intentionally left to rot to disqualify it from human consumption and divert it to FMFO production. Women fish processors, central to artisanal fisheries value chains, are increasingly unable to compete with FMFO buyers. These dynamics significantly undermine food security and exacerbate gender inequality in coastal communities. Furthermore, this unaffordability of the artisanal fishing operations is driving many local fishers and processors out of business, with an increasing number of them being forced to migrating to Europe in what is a tremendously perilous journey from Senegal to the Canary Islands.

The **FAO EAF Nansen programme** ⁷ currently supports research and the concerted management of shared sardinella stocks in Northwest Africa. It supports the elaboration and implementation of four national sardinella management projects in Mauritania, Senegal, The Gambia and Guinea Bissau. At the regional level, the EAF Nansen works with the Sub-Regional Fisheries Commission (SRFC) to develop a regional framework for the management of sardinella fisheries. The aim of this work is to draw up a regional policy paper proposing management options for the implementation of the CECAF recommendations. This policy paper will be submitted for adoption at the next SRFC Conference of Ministers in July 2025, so that concerted and coordinated action can be taken.

LDAC Recommendations

Given these latest developments, and taking into consideration the Commission's mission to work on a new generation of SFPAs in line with the EU regional strategy and priorities for Africa, the LDAC would like to make the following recommendations:

⁶ <https://lemag.ird.fr/fr/face-aux-effets-du-rechauffement-les-poissons-ouest-africains-migrent-vers-le-nord>

⁷ https://knowledge4policy.ec.europa.eu/projects-activities/eaf-nansen-programme_en



R1. Strengthening scientific research, fisheries governance and cooperation at regional level

The LDAC supports the recommendations of the seminar held in November 2024 by our partner **ATLAFCO-COMHAFAT**⁸ on the '*Cooperation and coordination at regional level for sustainable and fair fisheries access agreements*', with a focus on the shared stocks of small pelagics⁹, in particular:

- R1.1. The strengthening of fisheries research (e.g. regular assessment of stocks, collection of data) and formulation of scientific advice.
- R1.2. Ensuring that fisheries agreements are based on sustainability, fairness and transparency involving legitimate stakeholders in their negotiation, including the artisanal fishing sector.
- R1.3. That individual country's negotiations around fisheries access should not provide access that damages shared/straddling stocks. In this respect, individual agreements and any other arrangements on shared resources should be avoided.

Rather, regional fisheries organisations should be involved in the process of negotiating fisheries agreements to ensure that regional aspects of the management of shared species are taken into consideration.

R2. Renew and strengthen support for on-going regional efforts in the management of small pelagic stocks in West Africa

- R2.1. As one of the main partners of West African countries in fisheries (through SFPAs, international partnerships, structural programmes, aid for development and investments funds), the EU should renew and strengthen its commitment to support coordinated regional action towards the sustainable management of small pelagic stocks in West Africa, sardinella in particular, with a focus on inter alia, ensuring and safeguarding food security and nutrition, as well as equity and household income in the region.

In that context, the Sub-Regional Fisheries Commission Conference of Ministers which will be held in July 2025, offers an opportunity to show such support. One of the items for discussion and decision at this meeting will be exploring regional management options for implementing the CECAF recommendations:

⁸ https://www.comhafat.org/fr/files/actualites/doc_actualite_12110209.pdf

⁹ This seminar followed the 2023 Abidjan workshop on "Access agreements to fisheries resources in coastal states bordering the Atlantic Ocean" https://www.comhafat.org/en/files/actualites/doc_actualite_52204107.pdf

- R2.2. In line with the commitment expressed in 2022 in its Ocean Governance Communication¹⁰, the EU should renew its push for the upgrading of the CECAF as a fully-fledged regional fisheries management organization (RFMO), focusing primarily on the regional management of the shared resources of small pelagics.
- R2.3. In that context, the EU should advocate that allocation of fishing access in the region always prioritises those who fish sustainably and contribute to the region's food security and its socio-economic fabric, with particular attention to its small-scale fisheries sector, given its economic and social role. This means supporting those industrial fishing fleets and actors that contribute to local value chains for human consumption, rather than FMFO production.

R3. Promote a regional approach and a coherent network of SFPAs

The EU has SFPAs with several West African countries involved in the efforts to manage small pelagics sustainably.

These should form a coherent and complementary network that support regional conservation efforts and ensure both sustainability of stocks and continuity of activity for responsible fishing fleets operating within a robust legal, administrative framework and operational system:

- R3.1. The technical measures included in SFPAs regarding access to small pelagics should take fully into account both the national and regional managements plans/frameworks established by the coastal countries as part of their efforts to harmonise access conditions in line with sustainability, profitability and food security concerns (including zoning, biological rest periods, capacity limits, etc.).
- R3.2. The EU should call for improved reporting mechanisms and ensure transparency of, notably, commercial data regarding removals of small pelagic stocks, including catches by EU and non-EU distant water fleets in the partner countries, as well as local artisanal, semi-industrial and industrial fleets.
- R3.3. As part of the implementation of transparency clauses, the EU should also require more transparency in the operations of fishmeal/fish oil factories and their suppliers (quality/amount/species used) to ensure compliance with CECAF's recommendation that only fish processing waste will ultimately be processed, not whole fish.
- R3.4. The non-discrimination and transparency clauses inserted in SFPAs should be effectively implemented to all fleets of foreign origin for management measures undertaken and controls exerted.

¹⁰ https://oceans-and-fisheries.ec.europa.eu/publications/setting-course-sustainable-blue-planet-joint-communication-eus-international-ocean-governance-agenda_en



As LDAC members have highlighted during meetings, there have been several sightings of non-EU vessels fishing very close to the shore, switching off their AIS, and transshipping their catches at sea and ports to local fleets. This should include addressing the operations of foreign-owned vessels flagged to local countries, which often evade scrutiny. In this context, the EU should encourage the use of vessels' beneficial ownership transparency tools, in line with IUU Regulation Article 39.

- R3.5. The EU should, in accordance with Article 12(5) of Council Regulation (EC) No. 1005/2008, amend the list in Annex I of that Regulation so that meals, oils and other products relevant to this advice are no longer excluded from the scope of implementation of the catch certificate. Furthermore, the EU should assess, in consultation with the European Commission Legal Service, the legal options to expand the coverage of the catch certificate to other FMFO-derived products that cannot be included through the procedure described in Article 12(5) of the Regulation.

R4. Support to food security and nutrition

- R4.1. Local fishers have to go further at sea, for longer periods, to catch sardinellas because of their scarcity posing both economic, operational and crew safety risks. In the current conditions of overexploitation of their main target stocks, the pirogues and artisanal boats are not adequately equipped to maximise the catch for human consumption (lack of cold storage on board, etc.), limiting their capacity to contribute to food security. Equally, the onshore infrastructure should be improved to ensure that as many of the catches as possible can be landed and processed for human consumption. Through the sectoral support of the SFPAs, and in conjunction with other EU aid/EU member states initiatives (like promopêche, etc), the EU should develop a coherent regional strategy to support initiatives for maximising the contribution of small pelagics to food security.

These initiatives include:

- Improve landing, storage, and processing for local consumption;
 - Infrastructure and equipment codeveloped with artisanal fishers;
 - Prioritise women's cooperatives and local processors in the value chain;
 - Ensure regional integration of climate-resilient approaches to small pelagic management.
- R4.2. The EC should promote extensive studies of coastal livelihoods to help develop a better understanding of the multiple and interrelated vulnerabilities faced by artisanal fisheries value chains and communities.
 - R4.3. The EC is advised to ensure that any future renewed Protocols on the implementation of its SFPAs in the region scrupulously meet the principles and objectives of Article 31 of the Common Fisheries Policy.

END