



## BirdLife Malta feedback to Malta's National Fisheries Strategy

12/03/2026

---

BirdLife Malta welcomes the initiative to develop the National Fisheries Strategy, which aims to provide a comprehensive vision for Malta's fisheries sector. We have reviewed the document and would like to present the following comments and suggestions.

### General comments

#### **BirdLife Europe and Central Asia Vision on the Future of European Fisheries**

Future European fisheries are sustainable, built on **low-impact practices** and **ecosystem-based**, ensuring the health of marine habitats and vulnerable species such as seabirds, supporting climate adaptation, and **strengthening the resilience of coastal communities**. The voices and livelihoods of those who depend on the sea are at the heart of fisheries governance, ensuring that the wealth generated from the sea stays in the communities that steward it.

While we agree that Malta's small-scale fisheries should be supported to ensure their long-term viability, we are concerned that the National Fisheries Strategy places a strong emphasis on supporting fishing activities that may nonetheless contribute to overfishing, while giving less attention to transitioning towards low-impact fisheries and stronger management measures. Although small-scale fisheries are generally less damaging than large-scale commercial operations, Mediterranean fish stocks are already heavily depleted due to decades of overfishing. Consequently, all forms of fishing continue to exert pressure on already degraded ecosystems, and there should therefore be a stronger focus on supporting the recovery of fish stocks. Such recovery is only possible through effective technical measures and spatio-temporal management within Marine Protected Areas (MPAs), including permanent or seasonal fishing closures. This would also be in line with Malta's Conservation Objectives and Measures for Marine Natura 2000 site, where a measure on setting up 'Fish Revival Areas' is included (measure code CM\_NM5b)<sup>1</sup>. Strictly designated MPAs, where all forms of fishing are banned, have been shown to positively affect fish catches and economic

---

<sup>1</sup> Environment and Resources Authority. (2023). Conservation objectives and measures for Malta's marine Natura 2000 sites. [https://era.org.mt/wp-content/uploads/2023/02/MPAs-Conservation-Objectives-and-Measures\\_final\\_Feb2023.pdf](https://era.org.mt/wp-content/uploads/2023/02/MPAs-Conservation-Objectives-and-Measures_final_Feb2023.pdf).



returns for fishers. Consequently, focusing on the recovery of fish stocks would directly support the long-term viability of small-scale fishers.

We recognise that securing the buy-in of fishers for permanent or temporary closures can be challenging. Nevertheless, the National Fisheries Strategy provides an important opportunity to incorporate concrete actions in this regard. Early consultations and information sessions highlighting the benefits of fishing closures, including strictly protected MPAs, should be prioritised. While achieving such designations can be difficult, it is feasible with early and meaningful stakeholder engagement.

For example, in Amorgos, a small island in the Cyclades in the Aegean Sea, small-scale fishers, together with the Professional Fishing Association of Amorgos, developed a management plan to ensure the sustainability of local fisheries and address overfishing. In this initiative, fishers themselves proposed seasonal fishing prohibitions and the establishment of fisheries restricted areas with permanent closures in order to protect ecosystems essential for sustaining fish populations<sup>2</sup>.

Levels of protection can vary, ranging from no-take zones and multi-use zones to temporary or permanent closures, as well as restrictions on destructive gear types. Recent studies across several countries have shown that such measures can lead to increased fishery catches, spillover effects to surrounding areas, larger fish sizes, and overall economic benefits for fisheries. No-take MPAs consistently demonstrate the greatest benefits<sup>3</sup>.

In line with this, fishing closures should be informed by spatio-temporal scientific data to identify areas and periods critical for breeding, nursery grounds, recruitment, and other key life stages, as well as important seabird habitats and blue carbon habitats.

However, spawning closures alone may have limited effectiveness if spawning fish are not particularly susceptible to capture during that period, or if fishing effort increases during open seasons to compensate for closures. In some cases, overall fishing mortality may remain unchanged as fishers intensify effort when fishing is permitted. Additionally, fishing pressure may shift to other species or areas, potentially placing further strain on already vulnerable stocks<sup>4</sup>. For these reasons, the design and implementation of fishing closures must be strongly grounded in robust scientific

---

<sup>2</sup> <https://www.greeknewsagenda.gr/amorgorama-marine-conservation/>

<sup>3</sup> Costello, M. J. (2024). Evidence of economic benefits from marine protected areas. *Scientia Marina*, 88(1), e080-e080.

<sup>4</sup> Bagsit, F. U., Frimpong, E., Asch, R. G., & Monteclaro, H. M. (2021). Effect of a seasonal fishery closure on sardine and mackerel catch in the Visayan Sea, Philippines. *Frontiers in Marine Science*, 8, 640772.



evidence to ensure that they effectively contribute to stock recovery and ecosystem protection.

### **Funding and Incentives**

While we acknowledge that the majority of EMFAF funding is allocated to sustainable fisheries and the protection and restoration of the marine environment, we call for greater transparency regarding how these funds are distributed. Economic incentives should be directly tied to environmental care - fishers who protect habitats, avoid contributing to marine litter and ghost fishing, reduce bycatch and operate transparently should be prioritised for funding and market access<sup>5</sup>.

In particular, we recommend increased focus on:

- **Incentives for fishers**, including:
  - Monetary compensation to participate in trials testing the effectiveness of bycatch mitigation measures for sensitive species (seabirds, cetaceans, elasmobranchs, and sea turtles);
  - Monetary compensation for adopting fishing techniques that reduce environmental impact and substantially alter fishing practices or economic returns, such as night setting to minimise seabird bycatch; and
  - Access to free mitigation measures to reduce bycatch of sensitive species.
- **Financial support for vessel electronics** to enable electronic data collection.
- **Funding for enhanced monitoring and enforcement** to combat illegal, unreported, and unregulated (IUU) fishing. Enforcement data such as inspection outcomes and compliance reports should be made public.

### **ICCAT Fisheries Management**

Under Malta's national regulations, unused quota allocations are reallocated and continued participation in the sector is required to maintain eligibility. Together with the non-transferability of quotas, these rules may create incentives for fishers to utilise their quotas even when catches are low or economic returns are limited. As a result, fishers who temporarily choose not to go out fishing because low catch levels make it

---

<sup>5</sup> Birdlife International and Central Asia. (2025). Shaping the future of European fisheries



economically unviable may risk losing access to their quota or future eligibility. These conditions may therefore place pressure on fishers to continue contributing to overfishing even when it is not economically viable, which can be counterproductive to sustainable fisheries management and may contribute to additional pressure on ecosystems that are already under strain.

In addition, quota allocation frameworks should prioritise low-impact, environmentally responsible practices, as this can accelerate the transition to sustainable gear types<sup>5</sup>.

### **SO1: Enhance the Sustainability and Economic Viability of Trammel Net and Gillnet Fisheries**

Trammel nets are inherently non-selective and are known to generate substantial discards, which significantly impact fish stocks. Therefore, reducing discards through gear modifications should be a priority in the new management measures, in order to improve both size and species selectivity<sup>6</sup>. Such measures would also result in reduction of bycatch of undersized individuals. While we welcome the initiative to prioritise scientific research projects aimed at gathering essential data on coastal fish stock assessments in M3, we hope these projects will also focus on identifying coastal habitats that are critical for various life stages of fish, including nursery, breeding, and spawning areas. Once such key habitats are identified, they should be effectively protected through appropriate spatio-temporal measures, such as temporary or permanent fishing closures.

### **SO5: Promote the Sustainability and Efficiency of Trawling Fisheries**

It is widely recognised that bottom trawling reduces the biomass of demersal species by negatively affecting the abundance and size of species, not to mention the impact on sensitive species such as sharks and rays. Consequently, bottom trawling significantly alters benthic habitats and biodiversity<sup>7</sup>. This should be recognised as a key issue within this Strategic Objective. As a measure, bottom trawling should be progressively phased out in a way that is tailored to Malta's socio-economic context. The phase-out must not result in the displacement of trawling effort to other areas or in gear substitution that perpetuates ecological harm (e.g. trawlers converting to gillnetting). Hence the proposed measure M17 is strongly discouraged as this would only displace the trawling effort and move the problem somewhere else. Instead, fishers should be offered viable alternatives, either through opportunities to transition to low-impact fishing methods, or

---

<sup>6</sup> Petetta, A., Vasapollo, C., Virgili, M., Bargione, G., & Lucchetti, A. (2020). Pots vs trammel nets: A catch comparison study in a Mediterranean small-scale fishery. *PeerJ*, 8, e9287.

<sup>7</sup> Agnetta, D., Vascotto, I., Panzeri, D., Celić, I., Solidoro, C., Fortibuoni, T., ... & Libralato, S. (2025). Bottom trawling and environmental variables drive the biodiversity of mediterranean demersal assemblages. *Scientific reports*, 15(1), 27188.



through access to alternative marine-based livelihoods that preserve their connection to the sea. This phase-out, aligned with the overarching objective of reducing total fishing effort, represents a key opportunity to accelerate the transition toward low-impact fishing. Ultimately, species that can only be caught with destructive gear should be excluded from exploitation<sup>5</sup>.

### **SO6: Develop and Implement an Innovative Management Framework for Bottom Longline Fisheries**

Whilst we are pleased to see that the bycatch of seabirds has been identified as a key issue within this Strategic Objective, we would like to remind that bycatch of other sensitive species is also prevalent in this type of fishery including sharks and skates<sup>8</sup>. Therefore, we recommend that this key issue is revised to include not only birds but also other sensitive species known to be bycaught in bottom longlines. Hence, there should be an effort to determine the scale and frequency of bycatch for all sensitive species together with implementation of 'bycatch reduction devices', also known as mitigation measures.

In addition, it is not clear what the 'Lack of communication with Marine Protected Area (MPA) objectives' refers to in the key issues section. Further information on this should be provided.

### **SO7: Enhance the Sustainability and Productivity of the Lampara Fishery**

The target species of this fishery, small pelagic fish, are a critical source of food for various marine species and thus playing an important role in marine ecosystems. They act as structuring species for marine food webs due to their high abundances, fast population turnover rates and energy transfer from low to high trophic levels. Changes in their abundance may have strong impacts on both their predators (i.e. bottom-up effects) and prey (i.e. topdown effects). Potential effects of environmental changes or overfishing on small pelagic species population dynamics may negatively impact other organisms in the marine food web, and ultimately have strong ecological consequences at an ecosystem level. For example, a recent analysis of the diet of Mediterranean Yelkouan and Scopoli's Shearwaters, including populations breeding in the Maltese Islands, shows that they consume small pelagic fish such as sardines and mackerel, highlighting the importance of these species in the diet of these Annex I seabirds<sup>9</sup>.

---

<sup>8</sup> Jabado, R. W. et al. (Eds.). (2024). *The global status of sharks, rays, and chimaeras* (Part 5: Mediterranean and Black Seas). Gland, Switzerland: IUCN.

<sup>9</sup> Austad, M., Michel, L., Masello, J. F., Cecere, J. G., De Pascalis, F., Bustamante, P., ... & Quillfeldt, P. (2025). Diet of two mediterranean shearwaters revealed by DNA metabarcoding. *Marine Biology*, 172(7), 104.



In addition, it is well known that the target species of this fishery are usually sold to farm operators and for use as bait at a very low price – owing to the key issue identified of ‘persistently low fish prices’. The key issue identified ‘Need for improved promotion of lampara caught fish to increase market demand and awareness’, should therefore focus on setting higher market prices for farm operators and shifting from selling to farm operators to local markets for local consumption and should not encourage an increase in the catch of small pelagic fish – putting further pressure on these important fish species.

We support M24, which proposes spatial and seasonal measures for lampara fisheries. Spatial measures should prioritise areas that are important foraging grounds for seabirds and other sensitive predator species that rely on small pelagic fish. Important foraging areas for seabirds breeding in the Maltese Islands have been identified in BirdLife Malta’s LIFE+ Malta Seabird Project and are designated as Important Bird and Biodiversity Areas, later designated as Special Protected Areas (SPAs) under the Birds Directive. Spatial measures should start with these designated SPAs and consolidate existing tracking databases, including Movebank and the Seabird Tracking Database, which are regularly updated with new distribution data.

### **SO8: Promote Equitable Quota Access for Bluefin Tuna and Swordfish Fisheries**

Dolphin depredation is a recurring issue in surface longlines and should be listed in the Key Issues section. As a measure, there should be scientific studies to understand when and where this happens, and ecologically sensitive measures that can be implemented to reduce this issue.

Bycatch of sensitive species should be included in the Key Issues section. Surface longlines are well known to cause bycatch of sensitive species including cetaceans, sea turtles, seabirds and elasmobranchs. BirdLife Malta has been working on collecting data on seabird bycatch through the LIFE PanPuffinus! Project, the results of which were presented in the resulting reports, namely A1 Report: Report on fishing activities and seabird bycatch risk of gears and fishing practices covering Malta, Greece, France, Portugal and Spain. The results of A1 showed that 42.9% of vessels reported seabird bycatch in the Maltese waters. The results also showed that seabird bycatch in surface or drifting longlines is a more prevalent problem than previously documented<sup>10</sup>.

---

<sup>10</sup>Lago et al. (2025). Report on fishing activities and seabird bycatch risk of gears and fishing practices covering Malta, Greece, France, Portugal and Spain. Summary (full report can be provided upon request). [https://lifepanpuffinus.org/wp-content/uploads/2025/04/A1-report\\_summary.pdf](https://lifepanpuffinus.org/wp-content/uploads/2025/04/A1-report_summary.pdf).



### **SO13: Promote the Role and Valorise the Importance of Fishers in Providing Fresh Sources of Food Among the General Public**

Sustainable fisheries cannot succeed without addressing the demand side. Current consumption patterns drive overfishing, putting ecosystems under pressure beyond their capacity and depleting the resources we rely on. Shifting how we consume seafood towards less but more sustainable and diverse, responsibly-sourced seafood is necessary to allow the transition towards low-impact fishing to happen and to reduce pressure<sup>5</sup>.

Artisanal fishers need support through pricing policies that keep their catch competitive - consumers often choose cheaper industrial or aquaculture products while small-scale fishers struggle to receive fair value (we often hear from fishers that their fish is sold for peanuts). Regulations should therefore protect the price of locally and sustainably caught fish and ensure that a fair share goes back to artisanal fishers, for example through minimum price guarantees, fair-trade schemes, or incentives for restaurants and retailers to source directly from low-impact fisheries.

### **SO16: Reforming the Malta Fish Market Operational Infrastructure**

We welcome the need to strengthen enforcement of fish traceability. Environmentally conscious consumers are unable to choose low-impact, sustainably caught fish because this information is missing. Stricter labelling requirements should therefore be implemented, including clear details on the origin of the fish and the gear used to catch it. Regulations should also extend to restaurants, requiring clear labelling on menus regarding the origin of fish and the fishing methods used. This would align restaurant practices with retail requirements and allow consumers to make informed, sustainable choices.

### **SO17: Towards More Digitalised and Innovative Fisheries Technology Systems**

In the measures sections, the pilot testing and installation of Remote electronic monitoring (REM) systems should be included to improve data collection of catches and also of bycaught sensitive species, with accurate species identification. As already pointed out earlier, incentives should be in place to equip vessels with REM systems that allow such accurate reporting.

### **SO19: Foster Fisheries Knowledge Among Younger Generations and the General Public**



We recommend expanding public awareness campaigns to inform the public about harmful fishing practices, promote choices that favour more sustainable species, and encourage consideration of plant-based alternatives to fish<sup>11</sup>.

In line with this objective, the public should also be made aware of what low-impact fisheries entails and how their choices as consumers can make changes in the market demand. Shift the market demand towards catches from low-impact fisheries should be a priority in awareness raising campaigns.

### **SO20: A More Skilful and Trained Fishing Community**

Whilst we welcome M85 aimed at training recreational fishers in sustainable fishing practices, we believe such initiatives should also include full-time professional fishers. Although professional fishers often possess significantly more experience, traditional practices do not necessarily translate into low-impact or sustainable methods. Engaging the entire fishing community in mandatory training programmes and refresher sessions would be a more effective approach to facilitating the transition towards low-impact fisheries. This also presents an opportunity to provide new and young fishers (as addressed in SO10) with comprehensive training on selective, low-impact methods that reduce incidental catch of sensitive species. Topics should include identification of sensitive species, accurate reporting of bycatch in national logbooks, and safe handling and release techniques to increase survivability of live bycaught species. Participation in these training programmes should be mandatory for obtaining or renewing a fishing license.

### **Conclusion**

We recognise that this comprehensive strategy requires significant effort and are pleased to see that monitoring and evaluation, along with a timeline for achieving the Strategic Objectives and associated measures, have been included. To ensure accountability, the results of monitoring and evaluation should also be made publicly available.

We believe this strategy should primarily serve as an opportunity to transition to low-impact fisheries and support the recovery of fish stocks. Measures aligned with this objective should include:

---

<sup>11</sup> Fiorile, G., Puleo, S., Colonna, F., Mincione, S., Masi, P., Herranz Solana, N., & Di Monaco, R. (2023). Consumers' awareness of fish traceability and sustainability: An exploratory study in Italy and Spain. *Sustainability*, 15(19), 14103.



- Prioritising the reduction of seabird bycatch, including in surface and bottom longlines, through effective mitigation measures.
- Establishing scientifically informed spatial and seasonal closures, including strictly protected MPAs, to safeguard critical habitats and aid stock recovery.
- Strengthening monitoring and enforcement, including electronic data collection, to ensure accurate reporting of catches and bycatch of sensitive species.
- Supporting sustainable fishing practices and equitable quota systems that minimise ecological impact.
- Promoting public awareness and market incentives to increase demand for sustainably caught, low-impact fish.

Meanwhile, BirdLife Malta remains available to provide technical and scientific advice, particularly regarding the collection of seabird bycatch data and the implementation of mitigation measures to reduce bycatch.