

Subject: MAC's Advice on "Inception Impact Assessment on the Marketing Standards Framework for Fishery and Aquaculture Products"

Dear Executive Committee members,

The MAC advice on the marketing standards has been sent to the Commission this morning.

Thank you all for your efforts to put together this paper. Although the paper was delayed due to the difficult circumstances we are now in due to COVID 19, the Commission indicated that our input is valued.

Regarding the content of the advice, both the chair of WG1 and the chair of the MAC feel the paper is not only disappointing but that it yet again highlights that the MAC has not been able to reach a consensus view.

The procedures were all followed in the correct manner, with first the focus group and then the working group consultation. At this stage all opinions can be voiced, all arguments can be exchanged and the final draft paper can be discussed before it goes to the ExCom.

At the end of the working group consultation the paper held a very strong majority position on the core of the matter: the choice of scenario's. There were no indications from members that any major objections to the paper were to be expected at ExCom level.

This however in the end turned out to be different, and at ExCom level several members came up with fundamental different positions regarding the preferred scenario for the marketing standards roadmap. Following our rules and procedures, these views were added to the paper as a minority position.

The fact that the planned physical meeting of the working group had to be cancelled due to the COVID 19 crisis, and had to be replaced by a written procedure may have caused practical problems for members. We believe that if the members with a different opinion would have flagged this up during the working group consultations, the secretariat would have been able to better integrate the different opinions. At the ExCom level this was no longer possible given the procedures and the time constraint. It seems to us that there was a fundamental change of position by a significant number of organisations between what was agreed at WG and finally put forward at ExCom.

So following the procedures exactly we have sent the paper to the Commission.

In our view the advice lacks clarity and coherence, and as such does not meet the quality standards we should set as a MAC. We firmly believe the paper does not portray the MAC in the best possible light.



In our next ExCom meeting on May 29th it is imperative that we discuss in some detail how to avoid such a situation in the future. The rules and procedures are clear which were fully complied with in this case, but it comes down to how we can cooperate to produce the best possible consensus advice. Consensus advice should be the norm not the exception. The MAC is now in existence for more than three years and we still seem not to have learned how to compromise and to move away for set organisations positions in the interests of providing the best possible advice from the MAC.

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Chair of Working Group 1

Guus Pastoor
Chair of the MAC