

Production and Marketing Plans: Implementation and Challenges

The Market Advisory Council, particularly its Working Group 1- EU Production, chaired by Sean O'Donoghue, decided in May 2017 to organise an event on an issue of utmost importance for the MAC: the production and marketing plans (PMPs) foreseen in the Common Markets Organisation (CMO), Common Fisheries Policy (CFP) and supported by the European Maritime and Fisheries Fund (EMFF).

The event took place on the 27 September 2017 in Brussels and aimed at bringing together Member States (MS), Producer Organisations (POs), European Commission (EC), relevant stakeholders and members of the MAC to build the basis, through discussion, of a set of guidelines and good practices in the implementation of the PMPs. These guidelines will be put forward to the MAC for further discussion and elaboration.

The workshop, organised with the help of the European Commission DG MARE, was chaired by, Sean O'Donoghue, Chair of WG1 of the MAC.

MAIN CONCLUSIONS

The event was divided in three sessions (Commission, Member States and POs) and a final panel discussion. Find below the main outcomes of each panel.

DG MARE Session

Frangiscos Nikolian, Head of unit Economic Analysis, Markets and Impact Assessment in DG MARE

Christophe Vande Weyer, Unit Economic Analysis, Markets and Impact Assessment in DG MARE

You can find the presentation [here](#) and the Updated FAQs [here](#).

- The Commission will open the reflection on the future of the EMFF within the next weeks.
- The Commission conducted in 2016 an interim assessment of the implementation of PMPs covering 2 years (2014-2015). Its main outcomes were:
 - Formal compliance: (almost) all POs had an approved PMP
 - Relevance of PMPs in the framework of the CMO / PCP
 - POs have encountered an important administrative burden while drafting and implementing their plans: simplification is needed.
 - Legal uncertainties on eligibility of expenditures made several MS hesitant to put money on the table.
 - Huge delays in the payments (in some MS there are still no payments in place) leading to financial difficulties (and a risk of demobilisation)
- The Commission will develop an EU platform for POs to increase (transnational) cooperation, share experiences, etc. from 2018
- The Commission presented a state of play of the implementation of the EMFF so far. It shows that the very low pace of implementation does not only concern PMPs, but also that allocation planned for POs a quite substantial.
- The Commission also presented the updates list of the FAQs on the implementation of the CMO (measures supported by the EMFF). The Commission reminded that these FAQs are a Commission services interpretation and solely intended as a tool to assist those concerned to form a common understanding, but may not be considered as a legal interpretation.
- And finally the Commission reminded some of the requirements on the format of PMPs and related annual reports

Main conclusions from discussion:

- POs and MS have not fully embraced the new role foreseen for POs in the CMO and CFP.
- Special attention should be put on the content of PMPs and the huge divergence between the plans/MS.
- Result indicators are recommended in order to be able to evaluate the implementation of the plan in the annual report. The use of indicators is a good practice that enables close monitoring of implementation and identification of shortcomings. However the Commission reminded that the financial support to the PMPs is not in any way conditional on the use of these indicators.
- The use of simplified cost options could be promoted in the future

Certain national controlling bodies (auditors) do not seem to have integrated the novelty of the PMPs: expenditures are eligible according to their destination (i.e. necessary to reach an objective) and not according to their nature. The fear of such controls and possible correction contribute to slow down the implementation of PMPs or to limit their ambition.

Member States Session

Spain, María del Hierro Suanzes

You can find the presentation [here](#).

- The implementation of PMPs has been very low, due to the lack of funding for POs
- Some of the measures included in the plans are promotional campaigns, quality schemes, development of fishing gears from a conservation perspective, traceability and good practices.
- Spain is developing a database that will allow access to all documentation related to POs and their PMPs.

Ireland, Michael Keatinge

You can find the presentation [here](#).

- Both managing authorities and POs are still in a learning process regarding PMPs
- The drafting and management of the plan is covered under article 66 of the EMFF though implementation of actions could come from other articles in addition to article 66.
- Ireland funds 9 key areas of the plans: Preparation of PMP and Annual Report, Administrative implementation of PMP, Attendance at specified meetings, Management Advisory Committee (Administration Costs), Dissemination of knowledge & advisory services, Fish Stock Surveys/Trials, All Other Measures, Capital Costs and Indirect Costs (Overheads)

France, Mireille Stromboni

You can find the presentation and supporting documents [here](#).

- The late mobilization of EMFF credits was a major constraint on the capacity of POs to develop their PMPs. Payments for 2014 started at the end of 2016.
- There is an ongoing simplification of PMPs and annual report with three objectives:
 - Give better visibility to the measures presented by the PO
 - Replace the result indicators with a definition of the expected result for the measure, followed by an evaluation of that result in the annual report
 - Develop less detailed documents that will ultimately reduce the work of POs and services
- French POs have established a list of measures common to all PMPs (find it [here](#))

Main conclusions from discussion:

- It is advisable to include in the PMPs (e.g. in an annex) other measures possibly funded by EMFF
- A PMP cannot be reduced to a strategic document; it needs to be implemented



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- During the event Beyond 2020: Supporting Europe's Coastal Communities, 12-13 October Tallin, Estonia, a workshop on PMPs will take place

POs Session

France, Mr Pierre Carnet, Les Pêcheurs de Bretagne

- Their PMP is constituted of 3 major strategic axes:
 - operations linked to the management of the resources for sustainable fisheries activities
 - actions to add value to fisheries products
 - operations linked to the control of the activities that they are deploying through they PMP
- Payments were delayed almost 3 years
- Management authorities have been helpful in solving any issue or uncertainty and have invited the PO to participate in the elaboration of the national methodology framework that fixes, at France's level, the conditions of application of the PMP

The Netherlands, Mr Pim Visser, VisNed

You can find the presentation [here](#).

- There is a need to agree on best practices at a European level
- Guidance through regional groups is advisable
- There is room for improvement along the value chain
- Audits at national level result in uncertainties and fear of having to return funds

Aquaculture Italy, Pier Salvador, API

You can find the presentation [here](#).

- Europe imports more than 75% of the fish products
- Traceability should be ensured; not only the latest processor should be on the labels
- Private labels do not ensure quality; EU regulation does

Denmark, Lise Laustsen, Danish Pelagic Producers Organisation

You can find the presentation [here](#).

- POs have to face delays in funding and administrative burdens.
- Some of the measures included in their PMPs are those related to MSC certifications and audits, to fisheries management, to information about regulation and quotas and to improving the conditions for the market of fish products
- New measures in 2017 include Brexit costs, projects for a Code of conduct in the Danish pelagic fishery and media training and media strategy

Spain, Sergio Lopez, OP-Lugo

You can find the presentation [here](#).

- Examples of measures included in PMPs include improving communication; scientific observers, promotion and guidelines for good practices
- The "one size fits all" approach does not apply given the huge differences between POs
- The PMP are a good instrument to improve competitiveness but difficult to draft and implement
- EMFF will not be exploited to its maximum capacity due to the delays in the payments

Some suggestions for the future

- Better use of financial mechanisms
- Simplification and harmonization in drafting PMPs



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- Flexible measures to be implemented, adaptable to the needs of each PO
- Continuation of storage mechanism after the 12/31/2018

EAPO Guidelines and tool box. The future of PMPs after 2020: ways of financing

Emiel Brouckaert, EAPO

You can find the presentation [here](#).

EAPO's Tool Box ([link](#)) for POs allow them choose the most appropriate measure to match their nature, diversity, size and operating environment, and includes 8 types of measures: planning production, maintaining high quality production, environmental, improvement of marketing, research and experimentation, prevention and management of crisis situations, training and aiming at promoting access to advice and other measures (which include software related to monitoring national strategy and investments in third companies taking actions to achieve the objectives of the national operational programs)

Some of the key issues stressed were:

- PMPs are contracts with MS where its laid down how to perform this new role for POs
- In order to achieve CFP and CMO objectives, financial support at 100% for the creation and implementation of PMPs is essential
- Article 66 of the EMFF only provides funding until 2020 but the closure of the EMFF is 2023. A continuation of the mandatory funding under this article from 2021 is needed.
- An effective and efficient system for providing funding to the POs for the creation and implementation of the PMPs should be adopted without the inordinate delays experienced with the present funding

Concluding session – Panel Discussion and Conclusions chaired by moderator

Participants exchanged views on what they consider to be best practices in terms of developing, monitoring and funding PMPs:

1. It is fundamental to bear in mind that PMPs should follow a **bottom-up approach** as POs know best what to do to achieve their objectives
2. Examples of PMPs could be drafted and these models would be made available by the Commission if considered illustrative of best practices
3. It is advisable to follow **Commission Recommendations** of 3 March 2014 on the establishment and implementation of PMPs
4. **Online platforms** to share information about PMPs, POs and good practices, promoted already in some countries, are presented as useful tools
5. **Best practices among Commission services, MS and POs** should be shared and implemented now in order to pave the way for the next financial period
6. The **EMFF** should be conceived as an opportunity to improve and increase the production, not as a lifesaver for POs
7. **EAPO's Tool Box** of voluntary measures could be of help for POs as a guide of measures to take on board
8. It is advisable to mention in the PMPs references to **other resources/projects**, linking objectives and the respective articles of the EMFF, as this inclusion does not imply an approval of those resources/projects.



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9. PMPs should include performance criteria or indicators so as to facilitate the draft of the **annual report**. The inclusion of these indicators does not involve any financial consequence in case of not reaching the objectives
10. Templates should be draw up for mandatory measures while EAPO's Tool Box could be useful for the optional measures. The list of measures common to all PMPs that **French POs** have drafted should be looked at in order to come up with the best possible template
11. The **aquaculture sector** should not be forgotten in this process
12. **Delays** in funding, huge **differences in length** between PMPs and **administrative burdens** should be addressed