



Acting Director-General Bernhard Friess
Directorate General Maritime Affairs and Fisheries
European Commission
Rue Joseph II 99 1049, Brussels

6 May 2020

Subject: Opposition to announced future allocation of funds to the Advisory Councils (ACs)

Dear Mr Friess,

The Market Advisory Council (MAC) would like to express its opposition to the proposed future allocation of funds to the Advisory Councils (ACs) announced on 23 April 2020, which represents a 30 000 EUR reduction of the theoretical amount to be granted.

According to the letter sent by the Commission services, the following criteria was used: “the average amount spent between 2016 and 2018, the number of members in each AC’s General Assembly, the distance between the seat of the AC and Brussels, the number of languages interpreted and the number of languages translated. 90% of the available envelope was allocated in accordance with the average amount spent and the number of members in the General assembly. The distance between the seat and Brussels together with the number of languages interpreted or translated contributed to 10% in the funds allocation”.

The MAC considers that the allocation of 90% of the available envelope in accordance with the average amount spent and the number of members in the General Assembly constitutes a blind measure that does not take into account the specificities of each AC and stuns the potential growth of the MAC. Under the areas of competence established by the Common Fisheries Policy (CFP), the MAC has competence over “all market areas”, meaning that the MAC can theoretically have members from all 27 EU Member States. Furthermore, the MAC has the potential to attract a wider range of stakeholders than most ACs, since its topics are relevant to primary producers from the catching sector, aquaculture producers, processors, traders, suppliers, retailers, trade unions, environmental NGOs, development NGOs, consumer organisations, among other associations. Therefore, the theoretical

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amount allocated to the MAC should not be smaller than the ones allocated to ACs with restricted geographical competence and relevant to a smaller number of stakeholders.

At the end of 2019, following the implications of Brexit, the MAC had 57 members from 10 Member States (Belgium, Denmark, France, Germany, Ireland, Italy, Netherlands, Poland, Spain, and Sweden). The Secretariat sent letters to the national authorities of all Member States without members in the MAC's General Assembly inviting them to promote membership applications among their relevant stakeholders. Following this action, the MAC received a membership application from a Romanian association. The Secretariat has also been in contact with several Portuguese associations. The relevance of the MAC's work goes beyond its specific members, as can be demonstrated by requests from the national authorities of Lithuania, Croatia, and Slovenia to participate as observers, despite the lack of members in the General Assembly. Additionally, several of the MAC's members are EU-level associations whose membership covers more Member States than those directly represented.

The MAC also considers that the 2016 to 2018 period intrinsically benefits ACs founded earlier. Unlike the original regional ACs, the MAC was only foreseen with the 2014 CFP reform and was established in September 2016. During its operational years, the MAC received the following allocation of funds from the Commission: 136 643 EUR in Year 1 (2016-2017), 240 244 EUR in Year 2 (2017-2018), and 254 618 EUR in Year 3 (2018-2019). The period analysed by the Commission corresponds to the first years of operation of the MAC, in which this AC was still developing internal rules and practices, building trust among the different stakeholders, and agreeing on priorities and topics of discussion. The funds allocated demonstrate that, as the MAC develops, the funding needs also intensify.

Following requests by the Commission to increase the number of outputs, the MAC was foreseeing an increase of meetings and workshops for Years 4 and 5, which will no longer be viable with the foreseen reduction. As examples, on November 2019, the MAC and the NWWAC co-organised a workshop on marine plastics and the seafood supply chain, which was "very much welcomed" by Commission representatives at the 2019 Inter-AC Meeting, and the MAC is foreseeing the organisation of a workshop on ecolabels and certification schemes with a particular emphasis on issues relevant to the Commission (limited number of alternatives / market access, lack of clarity on the definition of sustainability, the repartition of costs along the supply chain).

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The MAC does not understand the relevance of the distance between its seat and Brussels. The MAC is located in Brussels, but the vast majority of its members are not located in Belgium, representing substantial costs in terms of reimbursements of travel expenses and “per diem” allowances. The seat in Brussels has significant high operational costs, for example in terms of taxes, salaries, and rent. At the end of the present operational year, the MAC will launch a new call for tenders to select the secretariat services for the next three years, which might translate into an increase of costs. Furthermore, there are significant meeting costs, as it is recognised by the Commission Delegated Regulation (EU) 2016/1611 of 7 July 2016 on reviewing the scale for missions by officials and other servants of the European Union in the Member States. Nevertheless, the location provides an added value by facilitating the participation of Commission representatives in the MAC’s meetings and a higher availability of flights for the stakeholders located across the EU, so the ACs located in Brussels should not be penalised.

As for the number of languages interpreted or translated, the MAC currently guarantees interpretation and translations in English, French, and Spanish. As such, the allocation of funds should consider that the organisation of additional meetings by the MAC automatically leads into an increase in interpretation and translation costs.

Taking into account the above, the MAC would like to urge you to reconsider the theoretical amount to be granted and the used methodology, taking into account each AC’s intrinsic characteristics, potential, and history. We are confident that the MAC has an added value to the Commission by providing consensus-based advices by the stakeholders from the whole seafood supply chain and other interests groups.

We would like to thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink that reads 'G. Pastoor'.

Guus Pastoor

Chair of the Market Advisory Council

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