



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES
Maritime Policy and Blue Economy
The Director-General

Brussels
MARE.A.4/CVW

Subject: MAC and SWWAC recommendations on the support to Producer Organisations

Dear Ms. Bermúdez, dear Mr Lopez,

I would like to thank the MAC for the recommendations that were sent to the European Commission (DG MARE) and the Member States (MS) on 7 May 2025 on the necessary support to be provided to the professional organisations recognised in accordance with the CMO Regulation, and in particular Producer Organisations (POs).

I also greatly appreciate your thorough description of the challenges faced by the sector, and the professional organisations⁽¹⁾, in all their diversity. I can only repeat the conviction already expressed in previous replies that the structuring of the sector around these organisations, in particular POs, is essential to achieve the objectives of the CFP and CMO on the ground.

By way of preliminary comment, it must be recalled that the European Commission is not involved in the recognition procedure of these professional organisations, nor in the elaboration (content and annual / multiannual horizon), revision and implementation assessment of the POs' production and marketing plans (PMPs). That is why we view some of the recommendations as falling entirely within the remit of the competent authorities in the Member States. This is the case for the recommendations on the administrative burden, levels and continuity of funding, including advance payments, which are the responsibility of Member States. DG MARE remains nevertheless available to facilitate exchanges between all parties involved and provide relevant clarifications. I can assure you that DG MARE is most attentive to the importance the Member States give to their POs, including in terms of financial support to contribute to a level playing field and horizontal equity.

We share your view on the importance of promoting the benefits of being a PO member, particularly for small scale producers. To that end, when assessing Member States' national programmes, the Commission prioritises awareness-raising and encourages competent authorities to support small-scale operators, either in the creation of small-

⁽¹⁾ The latest lists of professional organisations (POs, APOs and IBOs) are available on DG MARE website: https://oceans-and-fisheries.ec.europa.eu/fisheries/markets-and-trade/seafood-markets_en

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scale POs, or in their integration within existing POs. These messages are reiterated in the course of implementation (Monitoring committees, MTFAP). The ongoing study on the CMO Regulation addresses the specific case of the small-scale operators in the POs' system.

The study also looks into the checks carried out by the Member States on their POs, in particular to assess whether, and to what extent, Member States have sufficient assurance that POs continue to fulfil the recognition criteria over time, including democratic functioning. This is an important element in maintaining a level playing field in the sector.

DG MARE acknowledges the specific difficulties in setting-up transnational (associations of) producer organisations (T-(A)POs). A substantial improvement would however require an amendment of the CMO Regulation and/or of the EMFAF, which is not on the agenda in the short term. These are issues to be taken up by the evaluation of the CFP Regulation, which is currently under way and will be finalised at the beginning of next year. Therefore, I invite you to refer to the guidance note of 28 January 2021 that DG MARE prepared for the attention of the Markets and Trade Expert Group on the subject.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu.

Yours sincerely,

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