



**Mr Joao MACHADO**  
Director General  
Directorate General Maritime Affairs and  
Fisheries  
Rue de la Loi 200  
1049 Brussels  
BELGIUM

Pelagic AC  
Louis Braillelaan 80  
2719 EK Zoetermeer  
The Netherlands

Tel: +31 (0)63 375 6324  
E-mail: [info@pelagic-ac.org](mailto:info@pelagic-ac.org)  
<http://www.pelagic-ac.org>

Date: 3 April 2018  
Our reference: 1718/PAC 127  
Subject: Post 2020 EU funding for fisheries and maritime sectors

Dear Mr Machado,

It is my pleasure to present to you in annex I the Pelagic AC's unanimous recommendation on post 2020 EU funding for fisheries and maritime affairs.

In case you have any questions, please do not hesitate to contact the secretariat.

Yours sincerely,

A handwritten signature in blue ink that reads 'Jesper Raakjær'.

Jesper Raakjær  
Chairman Pelagic AC



## Annex I

# Recommendation on post 2020 EU funding for fisheries and maritime sectors

3 April 2018

### Introduction

The European Commission is currently reflecting on the performance of the European Maritime and Fisheries Fund (EMFF) and has launched a consultation with Advisory Councils on post 2020 EU funding for fisheries and maritime sectors.

As outlined in a previous letter to DG MARE<sup>1</sup> the consultation timeframe of only three weeks provided by the Commission was too short to ensure a transparent consultation procedure allowing the Pelagic AC to contribute in a meaningful way. Therefore, the current recommendation is presented after the initial deadline.

### General comments

The EMFF is the main instrument of financial support to achieve the objectives of the Common Fisheries Policy (CFP). However, as of the 31<sup>st</sup> of December 2016 only 11% of the total fund has been allocated and only 3% has been spent according to the Commission's Open Data Platform<sup>2</sup>. This is significantly below what would be expected assuming an equal allocation per year from 2014 to 2020, indicating difficulties in accessing funds under the EMFF.

This situation can be partly explained by the late adoption of the EMFF, the late agreement on the EMFF regulatory framework and the late approval of the Member States' operational programmes. It is therefore crucial that the legal basis for implementing the next fund is in place before the current EMFF expires.

Another reason for the low uptake of the EMFF are the complex and often unclear rules and the bureaucratic burden imposed on those entities that wish to utilize EMFF funding. Especially for small- and medium-sized enterprises the costs related to educating themselves on EU financial regulations are prohibitive. Therefore, the Commission should consider simplifying the application and reporting processes and to offer free trainings, e.g. in the form of webinars, to educate people on how they can gain access to EMFF funds. These trainings should be widely advertised.

### Policy Objectives

The EMFF is supposed to contribute to the Europe 2020 strategy as well as the implementation of the CFP. In this regard the EMFF addresses six Union priorities, two of which are especially relevant from the perspective of the Pelagic AC. The first priority relates to *"promoting environmentally sustainable,*

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<sup>1</sup> <http://www.pelagic-ac.org/media/pdf/1718%20PAC101%20Response%20to%20COM%20request%20regarding%20funding%20after%202020.pdf>

<sup>2</sup> <https://cohesiondata.ec.europa.eu/funds/emff>

*resource-efficient, innovative, competitive and knowledge-based fisheries”, the second to “fostering the implementation of the CFP”.*

Both priorities have a number of specific objectives including the avoidance and reduction of unwanted catches and the improvement and supply of scientific knowledge as well as the improvement of the collection and management of data.

These objectives are particularly important to the Pelagic AC as evidenced by its track record of developing multi-annual management strategies, including measures to avoid and reduce unwanted catches, as well as its contribution to increase scientific knowledge and data collection. It is foreseen that these issues will remain as relevant as they are today post 2020 and should therefore be a priority and enhanced in the next funding instrument.

At the same time, we would like to point out the great difficulties experienced by the Pelagic AC in regards to accessing EMFF funding. Advisory Councils are supposed to have access to funds from the EMFF under both shared (Article 40) and direct management (Articles 86 and 89). However, past efforts by the Pelagic AC to start a dialogue with Member States on their operational programmes have to date not been fruitful. We strongly encourage Member States to consult and include the relevant Advisory Councils in their operational programmes. Furthermore, it should be possible that organizations from two or more Member States, including Advisory Councils, can apply for shared EMFF funding.

In contrast to Article 89 which purely covers the administrative financing of the Advisory Councils, Article 86 provides for financing of scientific deliverables, especially applied research projects, which may be carried out within Advisory Councils. However, the Commission has previously informed the Pelagic AC that it can only access such funds by responding to relevant calls published by the Commission<sup>3</sup>. This arrangement is highly unsatisfactory since Commission calls usually do not corresponds to the funding needs identified by the Pelagic AC.

An example includes the development of multi-annual management strategies. The Pelagic AC has a long history of developing such strategies and many of its stocks are now covered by such a strategy. However, the greatest obstruction to develop such strategies for the remaining stocks is lack of funding.

Another example includes genetic sampling and analysis for stock identification purposes. The Pelagic AC, through its industry partners, is currently involved in several genetic projects that aim to develop high quality genetic markers as well as a high throughput methodology eventually enabling real-time information on catch composition and stock mixing. Developing these and other ideas further will require substantial funding in the future, but with no possibility to submit an “open application” to EMFF funds, innovation and creativity, both essential drivers for a progressive fishing industry, will remain limited. The Pelagic AC therefore recommends that Article 86 will be amended in such a way that it provides access to EMFF funds using a similar mechanism as Article 89, i.e. without having to wait for a specific call published by the Commission.

Moreover, the Pelagic AC fully supports Article 29 which promotes the human capital, job creation and social dialogue. Under a new EMFF this article has to be further enhanced and additional funding should be provided for activities covered by this Article.

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<sup>3</sup> <http://www.pelagic-ac.org/media/pdf/1415ref11%20Response%20EC%20on%20EMFF.pdf>

In addition, it should be noted that under a new CFP the responsibilities of the Advisory Councils might increase. In such a situation it will be important that the available funding meets the needs of each Advisory Council.

### Regional solutions to tackle regional challenges

As outlined in numerous previous communications, regionalization has so far been a disappointing experience for the Pelagic AC. It must therefore be ensured that a regionalized EMFF will not lead to the same kind of disappointment. In that regard, the Commission must ensure that regionalization takes place at the appropriate scale which differs per fishery and species.

In general, the Pelagic AC considers an increased cooperation between and with Member States engaging in the same fisheries and exploiting the same stocks to be crucial. Therefore, Article 37 of the EMFF should be adapted to enable the funding and implementation of administrative means across Member States regional groups, e.g. by providing a regional secretariat that would ensure a more structured approach to regionalization and consultation with relevant stakeholders. The lack of any formal structure in the regional groups makes communication and the exchange of information difficult. Often there is a perceived lack of responsibility of the regional groups which could at least partly be remedied by providing the regional groups with the resources to fully engage with the Advisory Councils.

### Support for small-scale coastal fisheries

The Pelagic AC encourages preferential support for small-scale coastal fisheries. However, most stakeholders on the Pelagic AC do not represent small-scale coastal fisheries and its remit to comment on such fisheries is hence limited.