



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels, 16 March 2022
MARE/D3/PCO Ares(2022)

Subject: Joint-AC letter on contributions from Advisory Councils to Commission public consultations

Ref: your letter 2122PAC22 dated 4 March 2022

Dear Mr. Raakjaer, dear Chairs,

Many thanks for your joint-letter on contributions by the Advisory Councils (ACs) to Commission consultations and on the way these contributions are being dealt with.

I am aware that the ACs are involved in a large number of public consultations, some of crucial relevance for the CFP (e.g. the consultations on the action plan to conserve fisheries resources and protect marine environment and the preparation of the report on the functioning of the CFP) but also some of more general nature and linked to the implementation of the Green Deal, the Biodiversity Strategy or the Farm to Fork Strategy.

I understand that filling out EU surveys is not the easiest way for an AC to provide a recommendation based on consensus and reflecting minority opinions. These consultations have a general nature and are targeting all stakeholders, not just the ACs and the format used is crucial for the analysis and consolidation of answers. While we prefer to receive also the AC replies through this format, I can confirm the flexibility offered to you at the last inter-AC meeting, inviting you to provide specific recommendations on public consultations outside the EU survey, and using an alternative format, which better corresponds to your specificities.

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As far as the relevance of AC options and answers, I would like to confirm their specific weight in the decision making. Given the specific role assigned to ACs under the CFP, the responses from the ACs under public consultations are not treated in the same way as

the other answers. They are granted an added weight. This is even more the case when the recommendation sent to the Commission is agreed with consensus. Such contributions are without any doubt much more valuable and important for us than a contribution from individuals or individual interest groups.

I am aware of the difficulties that come with the sometimes short deadlines for answering to consultations. I can assure you that we try to provide as much flexibility as possible and whenever possible, do accommodate and extend deadlines. This is what we did recently for the online questionnaires on the CFP and on the CMO, which deadlines were extended with two weeks to satisfy your demand. In addition, to make it possible for you to prepare contributions more in advance, we are trying since 2 years to give you a better picture of upcoming files through more frequent inter-ACs meeting dedicated to policy files and by sharing with you our Annual Management Plan¹.

As far as your request for active dialogue through bilateral meetings on policy consultations is concerned, I confirm that indeed DG MARE is keen to participate to ACs meetings, provided they are planned in advance. Bilateral meetings on specific files having a link with the CFP might also be organised. However, we have no capacity to attend each and every meeting and I thus ask you to carefully assess and prioritise the discussions and needs, taking into account their direct relevance under the CFP (and thus the remit of the AC work) and the timing. In this respect, I particularly appreciate your efforts also to organise joint meeting with other ACs and to provide us with the planning upfront.

I agree with you that the ACs' advice should be tracked and monitored and I can assure you that the recommendations received feed directly into the policy reflection and preparation of initiatives. We also try to make this more visible by including specific references in our initiatives, such as for example in the considerations of delegated legislation² and in the Staff Working Document accompanying the annual Communication on the fishing opportunities³.

¹ Here is the link to DG MARE MP for 2022, just published: [Management plan 2022 – Maritime Affairs and Fisheries | European Commission \(europa.eu\)](https://ec.europa.eu/fisheries/management-plan-2022)

² See Commission Delegated Regulation 2020/2015 specifying details of the implementation of the landing obligation for certain fisheries in Western Waters for the period 2021-2023; Commission Delegated Regulation 2020/2014 specifying details of implementation of the landing obligation for certain fisheries in the North Sea for the period 2021-2023; Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030.

³ See SWD(2019) 205 final; SWD(2020) 112; SWD(2021)122 final

Let me thank you for your commitment and remind you the importance we attach to the advice we receive from the Advisory Councils. I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils (Pascale.COLSON@ec.europa.eu; +32.2.295.62.73).

Yours sincerely,

[e-signed]
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