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Ref.02/2025

Rome, 10 January 2025

Ms Charlina Vitcheva
Director-General, DG MARE
Rue Joseph II 99, 1049 Brussels

CC:
Mr Costas Kadis
Commissioner-designate for
Fisheries and Oceans
Rue de la Loi 200, 1049 Brussels

Dear Ms. Vitcheva,

In your two letters of December 20 (Ref. (2024)9178427 and Ref. (2024)9182061), answering our advice on the Technical Measures (STECF EWG 24-16) and Fishing Opportunities for 2025, you repeat two paragraphs at the beginning, in which you make statements that are not acceptable.

Therefore, and with the best of constructive spirits, it is of the utmost importance to clarify certain issues because you mix aspects that are not compatible and can be misleading, clouding what should be normal relations.

I must remind you that I am a member of MEDAC as president of the National Union of Sea Cooperatives (UNACOMAR - https://www.unacomar.es).

Likewise, I am not responsible for any publication on social networks, nor am I a member of the National Federation of Fishermen's Guilds.

Also, in the photos to which you refer, I do not hold any image that could offend anyone and can never be responsible for what other people do who, in any case, are free to have the positions they consider most appropriate in the defense of their rights.

You are starting from an erroneous perception, since none of the people who appear in the images in the link you provide are acting as members of MEDAC, but as representatives of different fishing organizations, trying to defend themselves from what they consider an outrage and an injustice.

In this regard, I must remind you that my presence in Brussels on the 9th and 10th was exclusively in the exercise of my position as President of UNACOMAR. At no time did I act as a member, much less as a representative of MEDAC.

The same goes for other people. Quite simply, MEDAC was not in Brussels on 9 and 10 December.

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Mixing these issues up can only be, as I say, due to a misinterpretation. And trying to involve MEDAC in this game would be excessive on your part. Understanding your discomfort, I do not want to see any intention to harm the Advisory Council.

Having clarified these points, I am deeply concerned by your statement when writing that "*as president and member of an Advisory Council created under the Common Fisheries Policy Regulation, I expect you to also interact in a professional and ethical manner; and to ensure this, I will seek ethical codes that bind the Advisory Councils and their members, in a spirit of collective responsibility and cooperation in good faith*", because it constitutes an interested statement that does not correspond to the reality and in which, in addition, you accuse me of having a behavior that has not been professional nor ethical. And I do not allow this excess on your part.

Not only that. In your words there seems to be a threat that, if true, would only seek to restrict the rights of the members of MEDAC just for being members of the Advisory Council, and when they act outside of it. A threat that you extend to all the Advisory Councils.

If this is the case, we must agree that we would be facing authoritarian behavior, which goes beyond the functions that are your responsibility.

Not only that, but it seems difficult to imagine how to continue to control the functioning of the Advisory Councils ("*I will look for ethical codes that bind the Advisory Councils and their members, in a spirit of collective responsibility and cooperation in good faith*") which, as you perfectly know, operate by consensus and under an indisputable control done by the DG MARE.

We are not in school, and this is not child's play. The members of all the Advisory Councils take our responsibilities very seriously, even if it is because our way of life depends on decisions made by third parties that, for a long time, seem to be totally alien to our reality.

Yours sincerely,

Antonio Marzoa Notlevsen
MEDAC Chair

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