MEDAC - Registered Office Via XX Settembre, 20 - c/o MIPAAF - 00187 Rome (Italy) - Tax identification number 97534810581 - Association registered with the Prefecture of Rome as a legal entity n.1224/2017

Ref.:110/2020

Rome, 5 May 2020

Bernhard Friess
Acting Director- General
DG MARE
European Commission

Dear Director General,

The aim of this letter is to call your attention and show the concern of the MEDAC to the process of consultation followed in relation to the Farm to Fork Strategy and its Roadmap unveiled by the European Commission representatives on a web conference titled "*Dialogue on Sustainable Food Systems*" held on Thursday 16 April 2020.

Although we are supportive of DG MARE's attempt to establish a structured dialogue with stakeholders, the MEDAC would like to show its disappointment and serious concerns about the way in which this dialogue was conducted by the European Commission on the consultation of the Farm to Fork Strategy.

Some ACs were informed, by DG MARE officials at meetings held at the end of 2019, that there would likely be an EU public consultation on a Roadmap in the first quarter of 2020. However, the MEDAC Secretariat has never received any official communication via the DG MARE designated coordinators on the exact timing of launching of such an important consultation. It is difficult for the MEDAC Secretariat to follow in real time all the ongoing European Commission consultations advertised under daily notifications of Register of Transparency and Better Regulation initiatives.

As a result of this lack of communication, the MEDAC Secretariat was only informed on this consultation at a very late stage and in an indirect manner via those individual members that submitted position papers.

Although the MEDAC has participated in several public consultations over the years, we believe that a general and indiscriminate system of public consultation to all EU citizens and stakeholders giving an average period of 4 weeks is a sub-optimal way for MEDAC to prepare and provide a meaningful response to decision makers. Given that the MEDAC is made up of various stakeholder groups with many different opinions, **we require at least 6 weeks to be able to discuss within the AC and report back to the European Commission.**

The AC's situation is different from other organizations or individuals as MEDAC has a diversity of topics to debate, numerous working groups and a significant number of members representing the fishery sector, so they should have a different temporal treatment than general consultations (whereas the ACs have by essence to provide an advice based on consensus). For the particular case of the Farm to Fork (F2F) strategy, we believe that the Advisory Councils are good places for giving an advice, because their diverse composition comprises the whole fisheries value chain (from

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catching/harvesting, to processing, trading and exporting) as well as other interest groups, including NGOs.

- *EC WebEx dialogue on Sustainable Food Systems (16 April 2020)*

As the presentation was virtual and the organization before and during the meeting was quite confusing and chaotic for the attendees, it wasn't clear if it was possible to ask for clarifications since it was also not clear the aim of the meeting. Participants who had registered to speak ahead of the meeting could take the floor as well as any other participant who asked for the floor during the meeting. These participants spoke on behalf of their organisations. Furthermore, since none of the ACs did not have the opportunity to provide a shared position on the Farm to Fork, the MEDAC Secretariat could not take the floor.

Furthermore, we were informed in the middle of the meeting that this was effectively the final consultation from DG MARE side and that any AC input in writing had to be submitted as soon as possible and no later than the end of April (2 weeks).

As an immediate reaction, some of the members of Advisory Councils who attended the meeting expressed concerns and declared in writing that this meeting should not be considered as valid for consultation purposes.

In view of the above, the MEDAC would like to ask DG MARE services to consider our points carefully in order to avoid another negative precedent in terms of lack of time and to allow a proper consultation of the ACs. Furthermore, the MEDAC would like to ensure that in the future, DG MARE establishes more structured dialogues with stakeholders ahead of time.

We trust you take our requests into consideration and we look forward to receiving your response in writing at your earliest convenience.

Yours sincerely,

Giampaolo Buonfiglio
President

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