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.: 225/2021

Rome, 22 November 2021

To Lena Andersson Pench
Director General Fisheries Policy
Mediterranean and Black sea
DG MARE

Subject: Allocation of lump-sums: state of play and way forward (Ref.Ares(2021-7124803)

Dear Director General,

Thank you very much for your letter which will change our future administrative procedure for the grants.
As concerns our comments, please find below our points divided into some general comments concerning all ACs and specific comments concerning just MEDAC situation:

GENERAL COMMENTS:

- In your communication, you did not mention the "PRE-FINANCING" amount of 80% of the total grant which we are supposed to receive within 30 days after the beginning of the financial year, according to the Revised Guidelines (art. 6.9), is it confirmed also for the Lump-Sums?

- The lump-sums will be "*payable upon delivery of a set of outputs*", which are these outputs? Every year, outputs will be decided in a new Work Plan template? There will be also financial indicators or outputs to be delivered?

- Evaluation of OUTPUTS will be done internally by the DG MARE services?

- If we understand well, we are still going to produce a final report of activity but not a final report of actual costs incurred during the financial year, so we will not inform the EC in case of a surplus or a deficit. Is it correct?

- UNELIGIBLE Resources and Costs: they can be extremely different from one year to another due to the participation of the AC to other EU-funded projects, so in this phase, we can just communicate an estimation also of our "Ineligible Incomes" but they are subject to high fluctuations.

- The lump-sum will not be revised for the following 4 years, but what does it happen if Member State contributions will change or membership fees will change, can we ask for a revision of the Lump-sum or not?

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SPECIFIC COMMENTS:

- MEDAC new financial year starts on 1st January 2022 and **our FPA ends on 31st December 2021**. Are you going to send us a new FPA for 4 years in a short delay?

- MEDAC new financial year starts on 1st January 2022, this means that we will receive 80% of pre-financing **within 31st January 2022** or we should start thinking about delays due to internal procedures? It is a very important point for us!

- The EC maximum grant to MEDAC for 2021 and 2022 will be 385.000 € as mentioned in your letter and at moment our situation is that, however Covid-19 crisis has changed our way of working, we are currently in line with the provisional costs, so the term of reference you kept for MEDAC that of the years 2016- 2019 (299.000 €) is not anymore realistic. That's why we hope you will also consider this last year (2021) when you will evaluate the lump-sums for the MEDAC. Of course, we will provide you with all information regarding our current and future situation.

Thank you very much for the organisation of the Inter-ACs Secretariat meeting planned for next Friday (26 November), which we really appreciate and for taking into consideration our comments.

Best regards,

Giampaolo Buonfiglio
President

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