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: 312/2019 Rome 29 November 2019

Subject: MEDAC reply to "Place of Small-Scale Fisheries in Advisory Councils" (Ref. Ares (2019)6551530-23/10/2019)

Dear Ms Veits,

The Executive Committee members of MEDAC met in Rome on 12th of November and acknowledged the importance of the cooperation with DG MARE in improving the SSF participation in the advisory process. In fact, MEDAC shares the social, environmental and cultural role of the Small-Scale Fishery in the European coastal communities and, from the beginning of its functioning, has always paid attention to the characteristics and specificities of SSF in the Mediterranean basin.

Referring to the implementation of the rules included in the Commission Delegate Regulation 2015/242 and reported in the DG MARE letter sent to the ACs on this topic (Ref. Ares (2019)6551530 - 23/10/2019), MEDAC agreed on the considerations listed below.

The MEDAC applies the "open door" policy, as reported in the Statute Art. 3.1. "*European and national organizations representing the fisheries sector and any other stakeholder groups involved with the Common Fisheries Policy in the zone of interest may request to become members of the MEDAC*". Moreover, in the Statute this concept is reiterated in the Art. 4.3 "*The 60-40 proportions shall be fully maintained for the Executive Committee, while for the General Assembly they are to be considered the goal to be achieved, while not excluding any organization that wishes to apply for MEDAC membership*".
Furthermore, the Art. 5.7 of the MEDAC Statute states that "*The Executive Committee is made up of 25 members, maintaining the proportions of 60% and 40%*" and "*After consultation with the EC, the General Assembly (GA) may decide, at the Chairman's proposal, to appoint an Executive Committee of up to 30 members to ensure adequate representation of small-scale fisheries*". The General Assembly didn't decide to appoint an ExCom up to 30 members because the associations participating in the Executive Committee already assure a clear prevalence of the SSF representation.

The balanced and wide representation of all stakeholders is ensured by the deliberations of the organization bodies, according to the Commission Delegated Regulation (EU)2015/242. Moreover, as reported by the MEDAC members contributing at the GFCM High Level Conference on SSF (Malta, September 2018), the EU Mediterranean SSF organizations are all represented by the MEDAC members in Spain (Cofradìas de Pescadores), Croatia (Croatian Chamber of Trades and Crafts), France (CNPMEM and CRPMEMs PACA, Occitanie and Corse), Malta (Għaqda Koperattiva tas-Sajd), Cyprus (Pancypriot Association of Professional Fisherman) and Italy (Italian cooperatives). The Slovenian organization is the only one from Slovenia in the MEDAC and it has been confirmed by its Member States. Referring to Greece, up to now, no organizations are widely representing SSF in the country. Therefore, in the General Assembly and in the Executive Committee the SSF is widely represented. In order to provide a detailed assessment of SSF representation in the MEDAC, during the last meeting of the ExCom that was held in Rome on November 12, it was decided to collect from each member of the 60% data regarding SSF representativeness, by the end of the year. This

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exercise will allow to provide the Commission with an overall estimation of the real composition of the fleets represented in the MEDAC. Moreover, in the GA the SSF representation is further enhanced by the Low Impact Fishers of Europe (LIFE) membership.

However, MEDAC acknowledges that – despite recent political will and own initiatives from the MEDAC itself to promote SSF in the Mediterranean Sea – the majority of the draft regulation the MEDAC participated to (West Med MAP, Control regulation, Adriatic MAP, …) mainly target other fleet segments. In line with the RPOA of the GFCM, DG MARE should first begin the process of analyzing the structure of SSF fisheries and their needs in each of the Member States, supported by the WG5 on SSF, to encourage fisheries management plans to be developed for coastal areas, focused around SSF, following a bottom-up procedures (with objectives defined at EU level by the current Common Fisheries Policy).

Considering that the MEDAC is the only Advisory Council managing 7 languages (8, including English) with the same budget of the other EU ACs, the efficient and full participation of all members is assured by the following interpreting and translating activities:

- the website is translated into English, French, Italian and Spanish;
- the documentation (GA-ExCom-WG-FG Reports) is translated into English, French, Italian, Spanish and Greek;
- the interpreting activities at the MEDAC meetings are provided in English, French, Italian, Spanish and Greek (also in Croatian, when funds are available, and the participants don't speak English/Italian).

The selection of interpreted and translated languages is based on the knowledge of the actual MEDAC members. The list of translated/interpreted languages can be improved according to the new memberships, participant needs and knowledge.

Lastly, difficulties have been encountered concerning the additional compensation because further information are required:

- the Commission Delegated Regulation 2015/242 states "*Each Advisory Council shall offer additional compensation to fishermen representing small-scale fleet organisations for their efficient participation to its work on top of the reimbursement of their travel and accommodation expenses. Such compensation shall be duly justified for each case.*" No additional information has been provided on the quantification method to be applied for an eventual additional compensation, and so it should be detailed which kind of supporting documentation shall be needed to duly justify the relevant amount (self-certification? Tax declaration? Financial balance sheet of the fishing company of the last year, or of the last 3 years?)
- Each agreed payment should correspond to the economic loss of the working days. The Commission Delegated Regulation 2015/242 does not foresee that this amount can be agreed on a flat-rate basis or justified by some kind of documentation.

Moreover, one more difficulty in the application of the additional compensation is due to the fact that this item is not included in the budget form provided for the EC (and so it is not clear whether and where to allocate such amount).

The MEDAC ExCom is available for any further information and cooperation aiming at improving the participation of SSF in Advisory Councils.

Best regards,

Giampaolo Buonfiglio
President

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