Ms Charlina Vitcheva
Director General
Directorate General Maritime Affairs
and Fisheries
Rue de la Loi 200
1049 Brussels
BELGIUM

Date: 04 March 2022
PelAC Reference: 2122PAC22
Subject: Joint-AC letter on contributions from Advisory Councils in Commission public consultations

Dear Ms. Charlina Vitcheva,

Following the Inter-Advisory Council meeting held on the 19th of January 2022, the Advisory Councils (ACs) collectively wish to bring an issue to your attention regarding the contributions from ACs to recent and ongoing Commission consultations. More specifically, the ACs would like to make a recommendation both on the process of targeting ACs for such consultations, as well as on the consideration of AC responses by the Commission services.

Firstly, the ACs wish to express their appreciation for the opportunity to respond to the public consultations on horizontal issues that have been launched over the course of 2021-2022. We underline the relevance and importance of these topics in the context of fisheries management, markets and aquaculture, and we are keen to contribute to this process, thereby fulfilling our function as stakeholder advisory bodies to the European Commission.

During the last years, the number of public consultations launched by the Commission has increased substantially. In addition, these consultations seem to target opinions of individual citizens, individual interest groups as well as multi-stakeholder groups such as the ACs, through the same channel (i.e. the online survey) and following the same timelines. As such, no distinction is made between the ACs with their unique role, and other respondents.

As expressed by several ACs during the last Inter-AC meeting on the 19th of January, it is our view that the online survey is a less appropriate format for addressing diverse stakeholder groups such as the ACs with different fields of specialisation. While the line of questioning may be suitable to gather general input from individuals or individual interest groups, it makes it difficult for broader groups such as the ACs to provide meaningful and consensus input. Often, the surveys do not enable the shared position of the ACs to be fully reflected. In this respect, the ACs appreciate the flexibility offered by the Commission during the Inter-AC meeting on the 19th of January, confirming that ACs are welcome to submit responses using an alternative format (such as letters, technical or position papers).

However, we wish to highlight another important issue we felt was left under-emphasized, namely the weight given by the Commission to the AC response.

ACs differ from individuals and individual interest groups in terms of representativity, but also in terms of structure and working processes. Considering the broad composition of the ACs (consisting both of industry sectors as well as other interest groups) and the efforts required to reach consensus between groups of diverging interests, we do not think it is appropriate that responses originating from ACs are treated on an equal scale as responses submitted by individuals or individual interest groups. Responses from ACs are the result of a deliberative process which ends in a balanced compromise position, often adopted by consensus. When evaluating all responses, we feel that evidence-based (consensus) advice originating from a broad group of stakeholders with in-depth knowledge on the issues at hand should bear its due weight, and thus have enhanced consideration over individual responses.

In addition, we would welcome a short summary of the way the responses have been taken into account, preferably through the policy paper/adopted legislative proposal by the Commission, so the impact of the ACs' advice can be duly tracked and monitored for transparency.

Further, we remind the Commission that seeking consensus between different groups of interest, developing responses and respecting internal procedures takes considerable time. Most ACs need at least 8 weeks to finalise working procedures with translated versions.

Finally, in our view the recent tendency of the Commission to reach out to ACs for input through the online survey channel only and the general presentations provided at Inter-AC meetings, dilutes the ability of ACs to deliver on their objectives of advising the Commission on relevant policy files. In addition to the questionnaire consultations on key fishery/markets/aquaculture-related files, the ACs would benefit greatly from an open bilateral dialogue with the Commission on such policy files.

In conclusion, when launching relevant EU consultations, the undersigned ACs ask the Commission to:

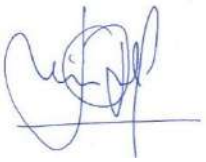
- Treat contributions from ACs to public consultations with added weight compared to responses from individuals/individual organisations;
- Document AC advice uptake at the end of the consultation process;
- Take working processes of ACs into account in a systematic fashion, i.e. by flagging upcoming consultations as early as possible, by providing translated documents in relevant working languages and by extending timelines for feedback submissions from ACs as appropriate.
- In addition to the questionnaire consultations, engage in active dialogue with ACs through bilateral meetings on relevant policy consultations.

We thank you for the kind consideration of the above, and we would welcome an opportunity to discuss this matter further with you during the next Inter-AC meeting planned for 31st of March.

Yours sincerely,

Jesper Raakjaer	Emiel Brouckaert	Guus Pastoor
Chairman Pelagic AC	Chairman North Western Waters AC	Chairman Market AC





Iván López van der Veen
Chairman Long Distance AC

Aurelio Bilbao
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Giampaolo Buonfiglio
Chairman Mediterranean AC