# Study to support the mid-term evaluation of the EMFAF

## Stakeholder consultation: Advisory Councils

## Introduction

As per Article 45 of Regulation (EU) 2021/10601 ('the Common Provisions Regulation' – CPR), the general rules of which apply to the EMFAF, the Commission shall carry out a mid-term evaluation to examine the effectiveness, efficiency, relevance, coherence, and EU added value of the EMFAF by the end of 2024, in line with Regulation (EU, Euratom) 2018/10462 ('the Financial Regulation') and the Better Regulation Guidelines[1]. This evaluation will encompass all 26 EMFAF programmes administered under shared management in the 2021-2027 programming period and support under Title III of Regulation (EU) 2021/1394 ('the EMFAF Regulation'), managed through direct and indirect methods.

The objective of the evaluation is to provide valuable **recommendations to optimise the EMFAF implementation and improve the fund's design for the next programming period**.

Given the early stage of implementation, this midterm evaluation focuses on the **design of the EMFAF** and its **continuing relevance**, **procedural aspects**, and **preliminary results**.

If you have issues filling in the questionnaire or wish to send us additional documentation, please get in touch with Ninon Gautier (ninon.gautier@tetratech.com). Please send her the completed questionnaire before **Monday 15 April 2024**.

### Overview

| **Advisory Council identification** | **Mediterranean Advisory Council (MEDAC)** |
|---|---|

1) What are the main changes/improvements of the EMFAF compared with the EMFF?

Greater flexibility in the measures and actions to be implemented, thus no longer based on a list of eligible and/or predefined measures, but within the specific objectives to be achieved. The definition of ineligible operations in order to avoid negative impacts on the conservation of fishery resources, always linked to the objectives to be achieved.

A fairly clear definition of the specific objectives within each priority, framed within the Strategic Objectives (defined in the CPR).

### Relevance of the EMFAF Regulation

**List of the specific objectives of the EMFAF**

- Strengthen economically, socially, and environmentally sustainable fishing activities (P1 SO (a))
- Increase energy efficiency and reduce CO2 emissions (P1 SO (b))
- Contribute to the adjustment of fishing capacity to fishing opportunities in cases of permanent cessation of fishing activities and to a fair standard of living in cases of temporary cessation of fishing activities (P1 SO (c))

[1] European Commission, Better Regulation guidelines, 11.2021.

- Foster efficient fisheries control and enforcement, including fighting against Illegal, Unreported and Unregulated fishing, as well as reliable data for knowledge-based decision-making (P1 SO (d))
- Contribute to a level-playing field for fishery and aquaculture products from the outermost regions (P1 SO (e))
- Contribute to the protection and restoration of aquatic biodiversity and ecosystems (P1 SO (f))
- Contribute to sustainable aquaculture activities, especially strengthening the competitiveness of aquaculture production, while ensuring that the activities are environmentally sustainable in the long term (P2 SO (a))
- Contribute to marketing, quality and added value of fishery and aquaculture products, as well as the processing of those products (P2 SO (b))
- Contribute to enabling a sustainable blue economy in the coastal, island and inland areas, and to fostering the sustainable development of fishing and aquaculture communities (P3 SO)
- Contribute to strengthening sustainable sea and ocean management through the promotion of marine knowledge, maritime surveillance, or Coast Guard cooperation (P4 SO)

2) Do you think the EMFAF Regulation address the needs of the different target groups at the sea basin level or in the field of your organisation?

The Regulation allows the measures to be modulated in various ways according to the willing of each MS. It will be the latter, therefore, who will have to undertake to prepare operational programmes as close as possible to the needs of the beneficiaries, with a view to achieving the envisaged objectives. However, we note that some target groups are excluded a priori from the possibility of accessing the EMFAF due to overcapacity, such as operators working with towed gears

## Delivery system

3) Are some sea basin-level territories lacking the administrative capacity or skills to implement the EMFAF?

For some particular measures, at a general level, this happens.

## Simplification measures

4) What are the simplification measures compared with the EMFF? What is your view on these?

Despite the calls for simplification, compared to the 2014-2020 EMFF programming period, as of today there are still no practical effects of simplification, at least as far as beneficiaries are concerned (in most cases, operations with EMFF commitments and payments have not yet started). Very often fulfilment is complicated by (excessive) control requirements. This is all the truer today with the adoption of Reg. 2023/2842 (revision of the control reg.), in conjunction with Reg. 2022/1181, which supplements the 2021/1139 EMFAF regulation with regard to the start dates and duration of ineligibility periods for support applications. This regulation on inadmissibility to EMFAF funds creates actual and sometimes irreparable damage, also because it often does not take into account the proportionality between the infringement committed and the sanction (inadmissibility) applied.

## Financial instruments

5) What is your opinion on the EMFAF financial instruments (design/use)?

Although funds are available, resources are not always spent on complex and lengthy procedures. In the case, for example (in Italy), of the Production and Marketing Plans of P.O. very often - even if the planning phase is carried out and the PPCs are approved by the competent Administrations - the executive phase is sometimes blocked due to a lack of guarantees on the advances necessary to implement the measure itself. Therefore, the planned actions are not carried out, the funds are not spent, and the objectives are not achieved.

## Flexibility

6) Do you think the EMFAF offers more flexibility than the EMFF, especially to respond to and mitigate crises?

Yes, it has more flexibility and could therefore be more effective in responding to crises. In order to mitigate crises, it is positive that the EMFAF, unlike previous programming, can "support actions that enhance the resilience of the fisheries sector, including through mutual funds, insurance instruments or other collective schemes that improve the capacity of the sector to manage risks and react to adverse events" (Consideranda 32 Reg. 2021/1139).

## Implementation to date

7) Do you have information on potential difficulties from specific target groups accessing the EMFAF?

No

8) Are there any specificities at the sea basin level that can hinder or favour implementing the EMFAF or achieving some specific objectives?

Certain limitations imposed per fishing segment (e.g. on engine renewal) can certainly hinder the achievement of the goal of more efficient, less polluting fleets, etc

## Efficiency

9) Do you think the costs related to the preparation of the applications are reasonable/proportionate for applicants?

Not always: it depends on the type of application, the measure, the possible advance that has to be made, and the complexity. Moreover, costs may differ between MS.

## Coherence

10) Do you think the EMFAF programme is coherent with the other EU policies at sea basin level/in the field area of your organisation?

Please specify the strategies you are referring to in the answer.

In general the answer is affirmative, although in many cases it fails to compensate for the limitations imposed on the fishing industry for the development of other policies (e.g. reduction of fishing areas for marine wind farms, military areas...). However, we note a contradiction between EU policies on the climate and on the reduction of CO2 emissions with the limitations for some target groups in this direction: we are referring to

the absolute lack of measures in favor of alternative fuels to fossil fuels for larger fishing vessels or other measures that reduce the carbon footprint.

Furthermore, the provision referred to in art.5 par.5. according to which the financial support from the EMFAF allocated per MS does not exceed 15% of the total Union financial support allocated per Member State, contradicts the latest provisions in terms of fishing effort reduction policies.

## EU added value

11) What is the added value of the EMFAF compared with what the Member States do at the national level?

Standardise financial measures for beneficiaries, as the CFP is an exclusively EU-directed policy.

**MANY THANKS FOR YOUR CONTRIBUTION!**