



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/Unit/MLD (2021)

Subject: Reply to the CCRUP recommendation 17 on the amendment of Delegated Regulation (EU) No 2015/242

Dear Mr Pavón,

Many thanks for your reply to the public consultation on the draft Commission act amending the rules on the functioning of the Advisory Councils (ACs) under the CFP.

In your letter, you refer to point 2(b) of Annex I to the draft delegated regulation, according to which an *‘organisation [that] represents or has direct or indirect economic interests linked to the use of the marine environment or maritime space other than commercial fishing, aquaculture or the processing, marketing, distribution and retail of seafood’* should be classified in the category of stakeholders *‘sector organisations’*. You expressed your disagreement with such a criteria, as you say it risks *‘allowing the participation of organizations that are not related to the defense of sustainable fisheries interests; and their participation may arise conflicts that do not contribute to the effective functioning of the Advisory Councils’*.

In reply to this, I would like to elaborate briefly on the objective pursued with the criteria for classifying member organisations into the two categories of stakeholders. The purpose of these criteria, as explained during the inter-AC meeting of 15 July, is not to set rules on which organisations are eligible to join ACs. The Commission will not seek to encourage or refrain the participation of any new kinds of organisations within ACs, as the responsibility of approving applications to ACs membership lies in the hands of the Member States. It is therefore the relevant ministries’ sole responsibility to assess the relevance of each application in relation to the objectives pursued by the AC concerned. The criteria available in Annex I to the draft regulation set guidance on how ACs should decide on the classification of organisations whose applications have already been approved. In the event where an organisation representing or having economic interests linked to the use of the sea other than commercial fishing or aquaculture joins an AC, it is important that our criteria cater for such possibility and provide clear guidance on how it should be classified.

Mr. David Pavón
President of the Executive Committee of CC RUP
dpavon@ccrup.eu
Rua de São Paulo, 3
9760-540 Praia da Vitória
Açores - PORTUGAL

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË - Tel. +32 22991111
Office: J-99 05/014 - Tel. direct line +32 229-50483

charlina.vitcheva@ec.europa.eu

We do however understand your concerns. This is why we will make sure, while interacting with the Member States, to be unequivocal on that fact that criteria 2(b) does not represent a formal support from the Commission to the participation of such organisations in ACs.

I hope this clarifies and will help the CCRUP reconsider its position.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils (Pascale.COLSON@ec.europa.eu; +32.2.295.62.73), who will forward it to relevant colleagues.

Yours sincerely,

Charlina VITCHEVA

c.c.: Daniela Costa dcosta@ccrup.eu