



Ms Veronika Veits
Directorate-General for Maritime Affairs and Fisheries
European Commission
1049 Brussel
Belgium

Dublin, 29 November 2019

Re: Place of Small-Scale Fisheries in Advisory Councils (Ares (2019)6551530 - 23/10/2019)

Dear Ms Veits,

The North Western Waters Advisory Council (NWWAC) greatly appreciates this initiative from the Commission to review progress made towards ensuring maximum participation by small-scale fisheries (SSF) sector in the work of the Advisory Councils.

By way of ensuring an up-to-date assessment of our current situation, a poll was conducted of our members to determine the number of SSF vessels represented by each. Replies were received from almost half of the industry members, making it possible to provide a general overview of SSF participation. This should not, however, be considered an in-depth analysis.

The NWWAC works towards the implementation of the four rules introduced by the Commission Delegated Regulation 2015/242 as outlined below:

- 1) *While the Executive Committee (ExCom) includes normally up to 25 members, the General Assembly (GA), after consultation of the Commission, may decide to appoint an ExCom of up to 30 members to ensure an appropriate representation of SSF.*

The NWWAC ExCom currently comprises 21 members; 15 industry, 6 OIGs, with a further 4 (OIG) seats unfilled. Of the industry members, 6 represent the SSF sector. This matter was discussed during the GA meeting in Dublin on 12 September 2018, where members agreed that the current limit of 25 does provide appropriate representation for the SSF. In addition, and given the current difficulty experience filling the OIG seats, it was agreed that increasing the membership beyond 25 would primarily serve to exacerbate the 60% industry – 40% OIG imbalance that now exists. For these reasons it was decided that the Executive Committee of the NWW-AC will continue to be limited to 25 members (15 industry and 10 OIG).

- 2) *The GA and the ExCom shall ensure a balanced and wide representation of all stakeholders, with emphasis on SSF where appropriate. The number of representatives of SSF should reflect the share of SSF within the fishing sector of the Member States concerned.*

The poll results further indicate that of the 50 industry members of our General Assembly, 18 include small scale fishers in their organisation. In the ExCom (15 industry members), 6 seats are occupied by member organisations who also count SSF representatives in their membership. Moreover, NWWAC members can participate in one or more of the four standing regional Working Groups (West of Scotland, Celtic Sea, Channel and Irish Sea), where SSF issues can be raised and addressed. For a more detailed overview, please see Annex I.

- 3) *Each AC shall seek to ensure the efficiency and full participation of all members through [...] the provision of interpretation and translation services.*





The NWWAC operates in three official languages, English, French and Spanish, and interpretation is provided at the three plenary meetings of the geographical working groups and Executive Committee, and at the annual meeting of the General Assembly. Likewise, all official documents and communications are provided in the three official languages.

In the case of Focus Groups (*i.e.* groups established for specific cross-cutting issues) members generally work in one language, decided-on by the group as a whole. Recognising the need to balance the overall cost of interpretation service with our strong desire to remove any barrier to full participation, the Secretariat is currently reviewing these arrangements with a view to introducing additional, limited, interpretation on a case-by-case basis. We have also revisited the timetable of our plenary meetings and now provide additional opportunity at these for meetings of the various focus groups; these meetings are provided with *full* interpretation services.

Finally, we note the increased use of video conferencing by our members, particularly for intersessional meetings. While these arrangements reduce the need to travel and, thereby, the overall cost of participation, we are mindful that current technology does not readily facilitate simultaneous interpretation. We will continue to investigate alternative technologies, and will, in addition, work with the Chairs of the focus groups to identify situations where these arrangements necessitate additional, limited, interpretation on a case-by-case basis to guarantee appropriate participation. That said, given the ever-greater workload of the Advisory Council, providing an unlimited interpretation service to all our meetings remains, probably unnecessary, and certainly beyond our financial capacity.

- 4) *Each AC shall offer additional compensation to fishermen representing SSF 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.*

Currently the NWWAC does not offer additional compensation to SSF fishermen participating in our meetings. We are, however, reviewing our *rules for reimbursement* and will shortly propose, to our membership, a revised set that will include a scheme for additional compensation for SSF members.

In conclusion, we would like to bring to your attention one further point raised by several members. This concerns the definition of SSF, currently under discussion in the new EMFF. Whilst recognizing the need for a clear and consistent definition of the small-scale sector, none the less the current approach could be seen as limiting the ability of owners/representatives of some small scale operators (fishing with active gears for example) from participating fully in the work of our Advisory Council when, in fact, many of the issues that concern these operators are shared with their colleagues operating with passive gears. Put simply, the current distinction – active or passive gear – may not fully serve the interests of all our members. We would respectfully ask to Commission to reflect on this matter.

Yours sincerely,

Emiel Brouckaert
Chairman Executive Committee

