



To:

Director General Evans

Director General for Maritime Affairs and Fisheries
DG MARE - European Commission
Joseph Straat II,
Brussels, Belgium

Address for correspondence:

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Dublin, 15th of April 2013

Subject: On the functioning of the Regional Advisory Councils within the current Common Fisheries Policy; Consolidated outcomes of discussions between the RAC Secretariats.

Dear DG Evans,

Following a period of reflection, and considering previous discussions with DG MARE by correspondence and at the regular Coordination meetings, the RAC Secretariats (henceforth, "we") have worked to develop consolidated opinions, on a number of topics on the functioning and effectiveness of the Regional Advisory Councils (Annex I).

Although the RACs are clear in their understanding that no changes in the functioning of the RACs are likely to occur until the completion of the review of the Common Fisheries Policy, we are taking this opportunity to provide this submission within the context of the current legal and institutional framework, as many of the issues could also be of relevance to the future running of the Advisory Councils (ACs).

1. Multi-annual work planning

The RACs are pleased to know that it may be possible to submit a multi-annual work programme in line with the duration of the Framework Partnership Agreements (i.e. 4 years). The RACs acknowledge that the Commission has already made a commitment to examine whether a multi-annual financial framework is possible and we look forward to hearing more on the outcomes of this assessment. This possibility, combined with the additional flexibility that we seek in managing our budgets, would contribute to enhance the work of the RACs and would represent a significant advance in operational efficiency.



2. EU co-funding programmes and other project funding sources available to the RACs (i.e. outside the operational budget)

Some RACs have already made progress on seeking funding, either directly, by engaging as partners in EU projects under various programmes (e.g. FP7, INTERREG, Atlantic Area) or indirectly by assisting in the definition of work packages or providing feedback, where relevant. For example, several RACs were involved, to some extent, in the MEFEO or the GAP 2 Projects (i.e. participating at annual coordination meetings) and the Pelagic RAC collaborated with the Norwegian industry and an independent fisheries scientist to develop a new harvest control rule for blue whiting.

It is also true, however, that limited resources and annual work programme priorities make it difficult to develop this type of co-operative, external engagement within the Secretariats. As such, a directory of available funding sources, generated by the Commission and based on a detailed knowledge of this area, would be gratefully received and would facilitate the task of fund seeking by the RACs.

It would also be particularly useful if the Commission could provide a list of additional funding options available to the RACs under the overall, multi-annual, EU budget, as well as guidelines on the compatibility of such funds with the annual Specific Agreements.

Many RACs are already playing an active role in looking for alternative sources of funding to carry out research or other related activities (e.g. fisheries-science partnerships) and we all commit to increasing the scope of our search to secure funding to particularly develop work in the following areas: multi annual management plans, technical measures, discards plans.

3. “Spin off” initiatives building on RAC work priorities

We are pleased to inform you of the following initiatives building on RAC work priorities:

- Several RACs have worked and exchanged views with the Commission for the inclusion of topics to be considered in future DG MARE calls for tender, for studies related to the objectives of the CFP. Two examples of this interaction are the exchange of views between the NWW RAC and the Commission on how to develop a decision-support tool to assess management options and investigate trade-offs for demersal mixed fisheries in the Celtic Sea; and the discussions between the SWWRAC and the Commission on a way forward to analyze discards reduction strategies;
- The North Sea, the North Western Waters and the South Western Waters RACs are currently working with ICES to set up science-industry-Member State collaborative groups to improve data deficiencies for stock assessments (e.g. ICES WKDDRAC) and several RACs are currently working with STECF in the review of Management Plans for stocks, such as Cod, Hake or Sole;
- The Pelagic RAC, in cooperation with the Danish Pelagic Producer’s Organisation and the IFM Research Centre of Aalborg University, has published a scientific article in the journal *Marine Policy* envisaging its future role in a reformed CFP.

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The outcomes of these, pro-active, initiatives demonstrates the positive contribution the RACs can make to extending knowledge and research as well as disseminating the results.

4. Improved access to scientific resources for evidence-based advice

We are all happy to note that there has been a remarkable improvement in scientific participation at RAC meetings. The inclusion of the RACs in the annual Memorandum of Understanding (MoU) between the Commission and ICES has really contributed to a more efficient use of scientific resources by the RACs in terms of the participation of ICES scientists at RAC meetings and the submission by the Commission of specific questions or requests for advice.

The RAC MED has also signed a MoU with GFCM, in order to strengthen the cooperation and collaboration between stakeholders and scientists in the Mediterranean Sea. This understanding will ensure the collection of the information necessary for the development of a comprehensive framework related to fisheries and aquaculture, designed by stakeholders and scientists using existing case studies.

The RACs are working to foster and develop this positive interaction and secure a more stable and fluid relationship with scientific experts. One of the aims of the RACs is to ensure direct and routine scientific participation in RAC work throughout all stages of the advice-making process. The majority of the RACs are of the opinion that it would greatly benefit the functioning capacity and efficiency of the RACs if the Commission could help the RACs identify, or allocate, additional resources for the recruitment of additional staff (e.g. scientific secondees, project coordinators). Such additional resources would actively engage with research projects, improve coordination and communication with scientists (particularly in the field of data deficiencies), benefit from existing synergies with scientific work and publications, and gather evidence to increase the quality of the advice provided by the RACs.

5. Possibility for the RACs to be involved in the identification of research priorities

This topic has been discussed at meetings with the Commission and there have been some very interesting exchanges on how useful the RACs can be in highlighting areas where further research can benefit the advisory process and fisheries management.

The RACs will endeavour to play a more active role in providing input on the kind of research that should be prioritised (by fishery/area), before calls are made for studies to take place. We look forward to a continued dialogue and exchange with the Commission on this subject. The bi-annual Coordination meetings provide a particularly useful opportunity to present updates and overviews in order to inform and avoid duplication.



Some RACs (i.e. Pelagic RAC and BSRAC) have shown a strong interest in providing comments to the draft Work Programme for Horizon 2020 initiative with respect to Challenge 5 (climate action, resource efficiency and raw materials) on future research needs regarding marine and fisheries issues.

6. Education and training provided to the RACs members and secretariats

The RACs appreciate the Commission's positive response regarding education and training. In particular, the RACs are very grateful for the invitations issued by the Commission, for RAC representatives to attend ICES training courses in 2012.

This initiative has been very well received by the RACs and the training obtained has proved very useful and effective to RAC attendees. The RACs would like the Commission to provide the same access to ICES training courses in 2013 and beyond.

7. Definition of criteria for RAC advice and Commission responses

In previous correspondence, the Commission indicated that it would produce a draft format for the provision of RAC advice, which would be sent to the RACs for comment.

We look forward to hearing more on this subject as the MedRAC, the SWWRAC and the NWWRAC, in particular, would be interested in using such a template. The previous DG MARE desk officer, Isabelle Viallon, provided the RACs with a draft set of guidelines in July 2010 that is annexed to this letter for information purposes (Annex II). The RACs would, however, emphasise that these guidelines were provided as such and by definition were voluntary in nature.

In addition, clear guidelines and criteria from the Commission for understanding the reasons for accepting or dismissing opinions or proposals would be appreciated. A feedback mechanism could include the reasoning and motivation behind Commission decisions in order to improve transparency and mutual understanding.

8. Development of new tools to facilitate improved communication and dissemination to the relevant stakeholders, fishermen and general public

Increased communication and dissemination of information to relevant stakeholders; individual fishermen and fisheries dependent communities ("*grass roots*"); and the public is needed both from the Commission and the RACs. This is also mentioned in the Commission's Communications on perspectives for simplifying and improving the regulatory environment of the CFP [COM(2004)820 final]; and review of the functioning of the RACs [COM(2008)364 final]



At present, RAC advice, opinions and recommendations are available for consultation on each RAC website, and the majority of the RAC websites also publish replies from the Commission.

Communications plans or strategies have been developed by several RACs in order to reach and inform the desired audience and keep members and stakeholders regularly updated on the work of the RACs (e.g. weekly/monthly newsletters, uploading relevant documents in publications sections, participation in workshops and seminars, media coverage through issuing regular press releases, etc.) The RACs have also established an inter-RAC group of Secretariats and hold meetings on topics of common interest (e.g. Events: Maritime Days, Annual Seafood Congresses; Functioning issues).

However, some challenges remain and all RACs are aware of the need for an improved communication and dissemination (e.g. development of information booklets for specific target groups¹). This is something that the individual RACs/ACs will continue to work on.

We hope you find our comments useful, and we look forward to receiving your written response and to discussing these topics with you at forthcoming Coordination meetings.

Yours sincerely,

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North Western Waters RAC Secretariat
Coordinator of the Inter-RAC Group

And on behalf of:

Lorna Duguid
Executive Secretary
North Sea RAC

Verena Ohms
Executive Secretary
Pelagic RAC

Dr Conor Nolan
Executive Secretary
North Western Waters RAC

Sally Clink
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Benoit Guerin
Executive Secretary
Baltic Sea RAC

Rosa Caggiano
Executive Secretary
Mediterranean RAC

Carlos Aldereguía
Executive Secretary
Long Distance RAC

¹ COM(2004) 820 final - Page 6 *"It is time to build on previous attempts to develop information booklets for specific target groups, for example fishermen operating in a specific area, whilst carefully avoiding confusion between explanatory booklets and legal documents [...] The Regional Advisory Councils could also play a key role here by designing the booklets and defining the content of each one and target readership"*.



ANNEX I. Issues for discussion on the functioning of the RACs

(Included in InterRAC Letter of 16th of February 2012)

1. Possibility to have a multi-annual work programme in order to have long-term planning
2. EU funding programmes and projects available for the RACs outside the operational budget
3. “Spin off” initiatives and projects building on RAC work priorities
4. Improved access to scientific resources
5. Possibility for the RACs to be involved in the identification of research priorities
6. Co-operation in hiring temporary or permanent staff to increase the work capacity of the Secretariats to facilitate engagement in EU and DCR projects
7. Education and training provided to the Secretariats
 - Participation of RAC staff in DG MARE training programmes
 - Commission open sessions on EU grants management
 - Explanation of legislative framework and decision-making process which have an impact on the work of the RACs
 - Clarification of the role and input of the RACs in different types of consultations launched by the Commission and/or Member States
8. Framework for formal co-operation with ICES and STECF
9. Definition of criteria for RAC advice and Commission responses;
10. Tools to facilitate improved communication and dissemination to grassroots.



ANNEX II. Draft guidelines for the Presentation of RAC advice

(Author: Isabelle Viallon - DG MARE, July 2010)

1. Introduction

- What is the subject of this advice? What is its scope? (fishery, area, etc)
- What is the origin of this advice? (reply to a consultation / own initiative of the RAC / reaction to a declaration/event, etc)
- What is the objective of this advice?

2. Background

- Refer to relevant legislative objectives, EC regulations
- Refer to previous recommendations and replies from the Commission (if any)
- Refer to the scientific advice from ICES/STECF on this topic
- Refer to any additional information available (biological/economic/social data) in support of the RAC position. Explain the origin of the data (scientific studies/advice, data collected by the industry...)

3. Discussion

- Detail your argumentation and, if necessary, report the different opinion expressed
- Develop the RAC position, detailing the purpose and likely effect of the alternative measures proposed.
- Use sub-chapters for each of the issue discussed

4. Conclusion(s) [= statement]

- List your main conclusions

5. Recommendation(s) [= requests]

- List your recommendations². What does the RAC request?
- Who is the addressee? Commission and / or Member States

6. Complementary information

- Explain how this advice has been prepared and refer to minutes of WG and EXCOM mtgs.
- Was the advice adopted by consensus? If not please insert dissenting opinions.
(NB: dissenting opinions can also be reflected in paragraphs 3/4/5)

² When relevant, explain your preferred option and possible alternative solutions (plan B).
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