



Mr. Bernhard Friess
Director-General for Maritime Affairs and Fisheries
European Commission
JII 99, B-1049 Brussels
Belgium

Madrid, 5th of May 2020

Subject: Consultation of the Advisory Councils on the Farm to Fork Strategy Roadmap

Dear Mr Friess,

The Long Distance Advisory Council (LDAC) and the South Western Waters Advisory Council (SWWAC) would like to express their concerns regarding the consultation process for the Roadmap on the Farm to Fork strategy and its connection to the web conference “Dialogue on Sustainable Food Systems” organised by the European Commission on Thursday, 16 April 2020.

A week before the conference, which was presented as a “*discussion session*”, the DG MARE coordinators invited the Advisory Councils to indicate a limited delegation of their membership. No further information beyond the draft agenda was provided, so the exact expectations of the Commission towards the Advisory Councils’ contributions were unclear.

Following several questions raised by AC Chairs and Secretaries during the web meeting, the Commission representatives informed the participants that this online discussion was effectively the final consultation. Any further input should be submitted as soon as possible and no later than two weeks from the date of said meeting. Additionally, this web conference would be considered as the “*targeted consultation of the Advisory Councils for fisheries and aquaculture*” mentioned in Section C of the Roadmap on the Farm to Fork Strategy. Taking into account the previously described context, the Advisory Councils expected this discussion to be an introduction to the targeted consultation and not the final stage. The Commission representatives were not able to provide a more detailed timeline for the publication of the Farm to Fork Strategy.

Concerning the launch of the Commission’s public consultation on the Roadmap on the Farm to Fork Strategy, we would like to highlight that there was no official communication from the DG MARE coordinators on the exact timing of its launch. Therefore, several secretariats were only made aware at a later stage or due to the submission of position papers from individual organisations. Moreover, as a result of the cancellation and postponement of meetings due to the COVID-19 outbreak, most ACs were not able to discuss and approve positions.

According to the CFP Regulation 1380/2013, the Advisory Councils have as one of their main tasks to submit recommendations and suggestions on matters relating to the management of fisheries and the socio-economic and conservation aspects of fisheries and aquaculture to the Commission and to the Member State concerned (Art.44.1).



It also states that Advisory Councils should enable the CFP to benefit from the knowledge and experience of all stakeholders (Recital 65), and adds that appropriate involvement of stakeholders, in particular Advisory Councils, at all stages – from conception to implementation of measures - is sought (Art. 3f).

We welcome the Commission's efforts to develop alternative approaches to exchange with the ACs and understand the limitations faced while the Commission services develop essential emergency measures to address the impact of the ongoing sanitary crisis. Nonetheless, we kindly ask to:

- Ensure that the AC Executive Committees' chair persons and the secretariats are timely informed on the publication of major public consultations and other relevant policy developments;
- Take into account the extraordinary impact of the current COVID-19 crisis on our work practices, particularly in the further development of the Farm to Fork strategy and consultation processes;
- Organise an adequate targeted consultation of the ACs, while liaising with the relevant units in DG SANTE and DG AGRI, with a timeframe that enables ACs to discuss the proposals within their membership and the adoption of advices.

For the particular case of the Farm to Fork Strategy, we believe that the Advisory Councils are the best placed bodies for giving a balanced advice based on compromise, given their diverse composition comprising the whole fisheries and aquaculture value chains (from catching/harvesting, to processing, trading, retail and exporting) as well as other interest groups including environmental and other NGOs¹. This collaborative work brings an added value to the contributions submitted by individual organisations.

We trust you take this requests, as well as similar submissions on this topic made by other Advisory Councils, into consideration and we look forward to receiving your response at your earliest convenience.

Yours sincerely,

Iván López van der Veen
LDAC Chairman

Aurelio Bilbao
SWWAC Chairman

Alexandre Rodríguez
LDAC Executive Secretary

¹ The OIG member organisations BirdLife Europe (LDAC only); Seas at Risk (LDAC-SWWAC); Oceana and Sciaena (SWWAC only) support the complaint of the LDAC about how the consultation process has been carried out by the European Commission, as DG-MARE should have formally consulted ACs earlier. However, they do not agree with postponing or delaying the Farm to Fork Strategy as it is important for the future of food production in Europe to release this strategy as soon as possible, especially because of the needed recovery following COVID19. The above mentioned NGOs would like to point out that the composition of the Advisory Councils is not balanced (60/40).