

Director-General Ms Charlina Vitcheva,  
Directorate-General for Maritime Affairs and Fisheries  
European Commission  
Rue de la Loi 200  
B-1049 Brussels  
Belgium

Brussels, 26 September 2024

Dear Director-General Ms Vitcheva,

First of all, heartfelt thanks for taking the time to address the NSAC membership at the 20<sup>th</sup> Anniversary events in Edinburgh a couple of weeks ago. Little is of more value than showing up for the people who tirelessly work for the benefit of our marine environment and society at large. Your presence and address at both events attest to your dedication to balanced stakeholder engagement.

This letter regards the Joint Special Group on Marine Action Plan under the auspices of DG MARE and DG ENVI and with the participation of Member States' fisheries and environmental departments.

The Joint Special Group was established in 2023 to aid the implementation of the Marine Action Plan to protect and restore marine ecosystems for sustainable and resilient fisheries. The main premise of the Joint Special Group is bringing together fisheries and environmental administrations to coordinate work on maintaining fish stocks at sustainable levels, reducing the impact of fishing on the seabed, and minimising impacts on sensitive species.

20 years ago, Advisory Councils were conceptualised with the 2003 CFP reform and realized with the establishment of the first ACs to achieve the same mission – to bring together unexpected allies from the fisheries sector and environmental conservation in order to spearhead the sector's transition to a more sustainable future.

Both of these initiatives are welcomed by our stakeholders. However, the prominence of both lies in the success of the cooperation between the two groups. As we also know from experience, such success is hard-won and requires years of determination and dedication before tangible results can be observed. The path is rarely linear, and setbacks are a given.

To progress, the structure of such cooperation must be aligned with its objectives. We believe that the Advisory Councils, themselves embodying and functioning by the same principles as the Joint Special Group, are not ensured their proper place in the discussions. So far, the Q&A session has been strictly split between environmental and fisheries interventions, not fostering a joint-up effort required by default in Advisory Councils. This generates antagonising positions and deepens the divide between the two poles in times where the opposite is not only desired but essential if we are ever to transition in a way that satisfies and is fair to everyone involved.

With that in mind, we kindly ask the Commission to reconsider the setup of the Joint Special Group by recognizing Advisory Councils as the rightful stakeholder body to comment on policy instruments affecting our stakeholders. We advise offering a priority slot to the Advisory Councils at the next meeting scheduled in Spring 2025 with an appropriate timeframe to relay their positions in a way that is consistent with the CFP objectives. This will not only encourage both stakeholder groups to work together and build trust, but engender new ideas and ways of thinking, foster mutual understanding, and ensure the necessary support to EU policies.

We also recall the [Joint-AC letter on ACs stakeholder input](#) from 5<sup>th</sup> December 2023 calling for a special status for ACs, among others.

On behalf of the North Sea and South Western Waters Advisory Councils, we thank you for your consideration of the above and look forward to discussing this at the first possible opportunity, notably the Inter-AC on the 4<sup>th</sup> of October.

With best regards,



Kenn Skau Fischer,  
NSAC Chair



Sergio Lopez,  
SWWAC Chair

