



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE/ D3/PCO/mb/Ares (2020)

Mr Galin Nikolov  
Executive Director  
Executive Agency for Fisheries and  
Aquaculture EAFA  
1, Knayz Aleksander Battenberg str.  
BG - 8000 Burgas  
BULGARIA

**Subject: Black Sea Advisory Council – support by EU Member States**

Dear Mr Nicolov,

Advisory Councils (ACs) are stakeholders' organizations that were set up under the Common Fisheries Policy (CFP) in order to ensure a wide representation of all stakeholders. The Black Sea Advisory Council (BISAC) was created by the 1380/2013 CFP Regulation<sup>1</sup> and started functioning on 1<sup>st</sup> January 2017<sup>2</sup>.

These Advisory Councils gather representatives from the sector<sup>3</sup> as well as Other Interest Groups such as environmental NGOs or consumer groups. Representatives from the Member States, the Commission and the European Parliament may attend their meetings as active observers. Their role was reinforced by the 2013 CFP reform, which set a regional approach to the implementation of the CFP. While they may submit recommendations on matters related to fisheries and inform the Commission and Member States of problems related to the management and the socio-economic and conservation aspects of fisheries and, where appropriate, aquaculture, they shall be consulted on joint recommendations submitted by Member States in accordance with Article 18 of the CFP. They are essential for the Commission as they have the knowledge and experience we need for the development and implementation of the CFP.

The Commission gives each AC an operational grant, which covers a maximum of 90% of its costs. The remaining 10% is covered by national, regional or local resources and by membership fees.

<sup>1</sup> See Annex III to the CFP Regulation 1380/2013 (OJ L 354, 28.12.2013, p. 22)

<sup>2</sup> See OJ L C74, 26.2.2016, p. 1.

<sup>3</sup> Fisheries including employed fishermen and, where appropriate, aquaculture operators, and representatives of the processing and marketing sectors

Since its start in 2017, it seems that the BISAC requested both Romania and Bulgaria to contribute to its functioning, but that they never get any positive answer.

I would like to remind that Commission delegated Regulation (EU) 2015/242 laying down detailed rules on the functioning of the Advisory Councils under the Common Fisheries Policy<sup>4</sup> encourages Member States to provide appropriate technical, logistical and financial support to facilitate the functioning of the Advisory Councils. Indeed, most Member States concerned contribute financially to the operational costs of the existing Advisory Councils.

The absence of contribution from Member States to the BISAC makes its functioning very difficult and prevents it from having a wide representation of all stakeholders taking into account their financial capacity. As the BISAC is a small-size AC with only 11 members, the fee for industry members was set in 2020 at more than €1.000 to try to reach the minimum 10% requested by the Commission. It is obvious that this prevents some stakeholders that would like to join the BISAC to participate to it.

I consequently invite you to consider providing appropriate support for the BISAC functioning. I am confident that you will do the best to this end. In addition, let me encourage representatives of Bulgarian authorities to participate to the BISAC meetings. Participation to such meetings may be eligible under the EMFF. Finally, I would like to remind you that in accordance with the CFP Regulation, Member States have to reply within 2 months to any recommendation, suggestion or information received from ACs and to state detailed reasons for divergence where final measures that are adopted diverge from the AC's opinion.

Should you have any question related to this letter, I invite you to contact Ms. Pascale Colson (pascale.colson@ec.europa.eu; +32 2 29 56273), coordinator of the ACs.

Yours sincerely,



Bernhard FRIESS  
Acting Director-General

Cc: Mr Gospodinov, BISAC chair;  
Mr Dimiter Tzantchev, Permanent Representative, Permanent Representation of the Republic of Bulgaria to the EU  
Mr Stoyan Kotov, Director, Head of the Maritime and Fisheries Directorate, Ministry of Agriculture, Food and Forestry  
Ms Laine, Mr Mitolidis (DG MARE)

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<sup>4</sup> OJ L 41, 17.2.2015, p. 41