



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels
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Mr Galin Nikolov
Executive Director
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The Republic of Bulgaria
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Subject: Financial support to the Black Sea Advisory Council

Dear Mr Nikolov,

In December 2019 the chair of the Black Sea Advisory Council (BISAC), Mr Gospodinov, wrote to the Ministry of Agriculture, Food and Forestry¹, asking for financial support from Bulgaria for the functioning of the BISAC. In April 2020, Mr Gospodinov received a negative answer from the Ministry², which explained its inability to contribute to the functioning of this organisation. In March 2020, we wrote you on this issue, but we have not yet received an answer to our letter.³

Advisory Councils are stakeholders' organisations that bring together the industry (fishing, aquaculture, processing and marketing sectors) and other interest groups (environmental and consumer organisations as well as recreational fishermen). They were set-up to provide the Commission and Member States with advice and information on issues related to fisheries management and they play an important role in the Common Fisheries Policy (CFP). We are very grateful for the work they are doing and the recommendations we are receiving from them.

Since 2014, Member States have the obligation to consult the Advisory Councils when preparing joint recommendations under Article 11, 15 and 18 of the CFP, or for technical measures at sea basin level⁴. They also have to be consulted on Commission measures in

¹ Ref.No.92-48/27.01.2020

² Reference X 92-48/03.04.2020

³ Reference Ares(2020)1363996

⁴ See Chapter III of Regulation 2019/1241 (OJ L 198, 25.7.2019, p. 105)

case of a serious threat to marine biological resources (Art. 12 of the CFP), on Member States' emergency measures (Art. 13 of the CFP), or on pilot projects on the landing obligation (Art. 14 of the CFP).

In parallel, in accordance with the CFP Regulation (Art. 44 of the CFP), whenever the Commission or a Member State receives a recommendation from an Advisory Council, it has to reply within 2 months and to state detailed reasons for divergence where final measures that are adopted diverge from their recommendation.

The Commission supports each Advisory Council with an operational grant, covering up to 90% of its costs. The remaining 10% is covered by national, regional or local resources and by membership fees. Since its start in 2017, the BISAC, which has its seat in Varna (Bulgaria), requested both Romania and Bulgaria to contribute to its functioning, but they never got a positive answer. The Commission 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. It also happens that Member States provide support in kind, such as staff, premises or meeting rooms.

The absence of Member States' contribution makes the functioning of the BISAC very difficult. Its limited financial capacity prevents it from having a wide representation of all stakeholders. As the BISAC is a small Advisory Council with only 13 members, the fee for industry members was set in 2020 at between €1.000 and € 2.200 in order to try to reach the minimum 10% requested by the Commission. Representatives of Small Scale fishermen are now considering to leave the BISAC because they cannot afford to pay their fees. NGOs also are facing difficulties in paying their fees. A small contribution of € 5.000 from both Bulgaria and Romania would make it possible for all stakeholders that would like to join the BISAC to participate to it.

I would be grateful if you could reconsider this request to provide this very limited financial support to the BISAC.

I remain at your disposal for any further discussion on this issue.

Yours sincerely,

Charlina VITCHEVA

Cc: Mr Dimiter Tzantchev, Permanent Representative, Permanent Representation of the Republic of Bulgaria to the EU - Square Marie-Louise 49 - 1000 Brussels
Mr Georgi Ralchev, Fisheries attaché, Permanent Representation of the Republic of Bulgaria to the EU, Square Marie-Louise 49, 1000 Brussels