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NOTE

from:	Delegations of Austria, Estonia, Finland, France, Germany, Malta, Portugal, Slovenia and Spain
to:	Council

No. Cion prop.:	17870/11 PECHE 368 CADREFIN 162 CODEC 2255 - COM(2011) 804 final
Subject:	Proposal for a Regulation of the European Parliament and of the Council on the European Maritime and Fisheries Fund [repealing Council Regulation (EC) No 1198/2006 and Council Regulation(EC) No 861/2006 and Council Regulation No XXX/2011 on integrated maritime policy - Joint position of Austria, Estonia, Finland, France, Germany, Malta, Portugal, Slovenia and Spain

Delegations will find attached a joint position on the delivery system of the European maritime and fisheries fund submitted by the above-mentioned delegations.

Joint position of Austria, Estonia, Finland, France, Germany, Malta, Portugal, Slovenia and Spain on the delivery system of the European maritime and fisheries fund

Commission recognizes the need to simplify the rules and streamline administrative procedures in its proposal for a multiannual financial framework and the accompanying simplification agenda for the MFF 2014-2020. In this respect, the Proposal for EMFF (European maritime and fisheries fund) suggests that the delivery mechanisms should be aligned with the EAFRD (European agricultural fund for rural development) in order to reduce the administrative costs due to the unified approach in terms of management and control.

However, in practise the Commission proposal is moving away from this important objective. The proposed switch from the current system to the EAFRD model would increase costs in administration and create broader monitoring and reporting obligations.

It should be noted that the interim evaluation of the EFF (European Fisheries Fund) programmes concluded that the current delivery system is efficient and well-functioning in a large majority of the Member States.

In the beginning of the current programming period Member States have spent a lot of resources in order to align the management and control systems to the structural funds. It has already been possible to use the same personnel for the implementation of both Rural Development and Fisheries funds in areas where it is feasible such as accounting and reporting. Mandatory alignment of management systems may even lead to counterproductive effects and destroy the synergies already achieved. For example alignment of reporting dates would lead to increased working load in the same timeframe.

Taking into account the current economic situation where MS are forced to find savings in the administration, simplification of delivery system and reduction of administration costs is a top priority for Member States.

In addition to the increased costs of the delivery system, the transferring phase will also increase the risk for delay of the implementation of the programmes and also the risks of administrative failures. Furthermore, it would mean that Member State would have to implement in parallel for some period of time two different management models.

Therefore:

- The delivery system of the EMFF should be based on the model of structural funds instead of the model of rural development fund. This requires amendments to the EMFF proposal;
- It also requires amendments on the EMFF aspects of the proposal on Common Provisions, without prejudice to member states' global position on the following articles that also relate to other funds dealt with under the CSF due:
 - in article 55 § 2, deletion of the terms “and the EMFF”;
 - in article 64 § 6-a) inclusion of the terms “and the EMFF” after “Cohesion Fund”;
 - in article 64 § 6-b) deletion of the terms “and the EMFF”.
- The delivery system of the EMFF fund should be cost-efficient and its requirements should take into account the limited size of the fund.