

Meeting for fisheries Community-Led Local Development Managing Authorities and National Networks

Brussels, 19-20 April 2018

Participants: Nearly 40 Managing Authorities (MA) and National Networks (NNs) responsible for fisheries CLLD from 18 Member States

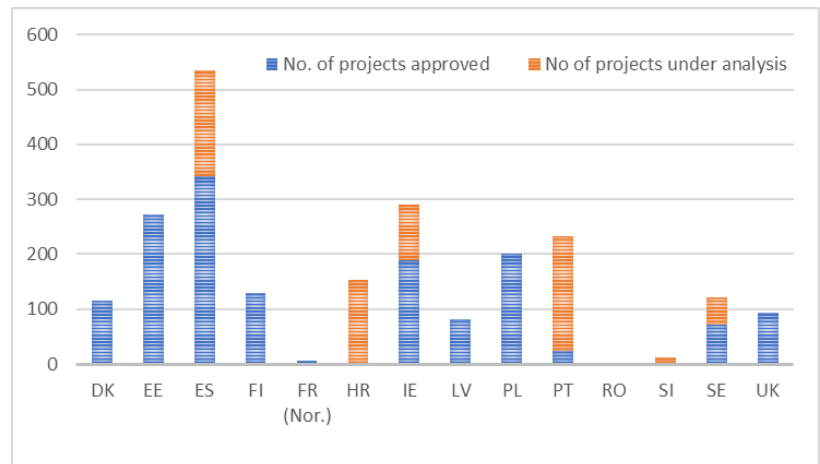
Organisers: FARNET, at the initiative of the European Commission

MESSAGES FROM DG MARE

- ✓ Implementation must speed up and the number of projects should grow faster. Administrative processes are quite slow and so far just €8 million (1.6% of money programmed under Union Priority 4) has been certified by Member States and paid out by DG MARE.
- ✓ CLLD is the best way to deliver growth at local level, but it is not sufficiently well known.
- ✓ Currently, the Commission is working on preparing regulations for the next programming period, with DG MARE taking into account discussion from the MA meeting in September 2017.

STATE OF PLAY

Over 1 500 projects have been selected by FLAGs and approved by the MA, and at least another 700 are under analysis. Nine of the MAs present estimate that by the end of the year between 50 and 80% of their total CLLD budget will have been committed. FLAGs in seven MS are involved in cooperation projects, but so far these are very few, usually 1-2 projects per country (exceptions are Estonia and Spain).



MAINTAINING FLAG OPERATIONS BETWEEN THE FUNDING

AVOIDING THE “FUNDING GAP”

Most FLAGs from the 2007-2013 period ceased operations at the end of 2015, but in many Member States, new FLAGs from 2014-2020 did not have access to running costs and/or were unable to select projects until 2017 or even 2018. This can reduce FLAG credibility with the local communities and lead to loss of skilled staff. As a result, implementation delays can accumulate and there is a risk of decommitments in 2018.

The participants discussed how a similar “funding gap” can be avoided after 2020. The experience of some MAs (such as Finland and the Spanish region of [Galicia](#)) that managed to speed up the process of FLAG selection and approval at the start of the 2014-2020 period was analysed. The following conclusions were drawn:

- ✔ It is essential to **start talking to FLAGs informally** as early as possible, ensure that work on strategies starts early and that national legislation takes account of local needs and priorities.
- ✔ **Calls** for FLAG strategies should be launched immediately after the start of the funding period, even **before the Operational Programmes (OP) are formally approved**.
- ✔ FLAG **running costs** should be assured until year n+2 or even n+3.
- ✔ Sufficient **staff resources**, and with the right skills, are needed within the MA to handle the call and preparation of national rules, some tasks can be outsourced.
- ✔ National implementation rules should be **kept to the minimum**: the more detailed they are, the longer it takes to develop them and make them work in practice.
- ✔ When planning work on the national legislation it may be important to keep in mind the timetable of **national elections** to progress as far as possible before the “dead” legislative periods.
- ✔ There are different stages of national legislation, not all of them have to be linked with the OP.
- ✔ Where possible, some work (such as getting local stakeholders involved, defining local needs) can already happen before the call is launched.

Some MA commitments concerning CLLD in the next period:

- Start informal discussions with FLAGs in 2019.
- Launch the call before OP approval.
- Speed up the national legislation process.
- Ensure eligibility of expenditure until selection of the new FLAGs.

IMPROVING CLLD DELIVERY

Key considerations of audits and controls

In two complementary presentations, a former [DG MARE auditor](#) and the manager of a [FLAG recently undergoing an audit](#) discussed with the audience what auditors are interested in and how to prepare for their visit. One of the key messages was to avoid “gold-plating” (creating additional implementation rules at national or regional level, on top of what is envisaged in EU legislation), or auditors will have to check if all these additional national rules are complied with. Another lesson was that if an implementation system is **well designed** and is working well, it is less likely to attract the attention of auditors.

Other issues discussed included **proportionality** – how small does an error have to be not to be taken into account? Normally the acceptable margin of error is 2% of the project or programme amount under audit. However, where the auditors only look at a representative sample of documents, it is the proportion of the error in the sample (not the total amount) which matters.



“Adding too many rules and conditions is making the applicants jump through unnecessary multiple loops – so keep your system simple!” - Richard Croft, DG MARE

WORKING GROUP DISCUSSION

The participants exchanged their experience on three topics identified at the registration stage:

The use of simplified cost options in fisheries CLLD

✓ Some practices helpful in applying SCOs:

- Simple methods of calculating running costs and animation in relation to staff costs.
- A fixed percentage of total budget for running costs.
- Informal discussions between MA and EC at the stage of describing the SCO methodology in the OP.
- New provisions in the “Omnibus” regulation facilitate SCOs in projects (not only running costs).

✓ Barriers (mainly linked with the initial calculation of amounts and rates):

- Collecting historical data takes a lot of work.
- Uncertainty of how future auditors would assess the calculation.
- If costs are set too low, some beneficiaries will be short of funds.

✓ Some solutions/sources of inspiration:

- Start with a few less complex, easy to calculate costs such as travel or daily allowance.
- Work with national statistics to help with some types of calculations.
- Disseminate the [European Court of Auditors’ report](#) on the use of SCOs (2017).
- develop a good practice using SCOs, or a real audit of SCOs.
- Learn from the experience of other EMFF priorities or other funds, train the paying agency.

Delegating tasks to the FLAGs and defining their role in CLLD delivery

- ✓ The CPR (Art. 34) specifies the minimum tasks of the FLAGs, including project selection. In spite of the provisions of Art. 34 of the CPR taking priority over fund-specific provisions on MA tasks, some MAs, due to restrictive national legislation, cannot leave the FLAGs full autonomy. This can lead to duplication of tasks. Definition of monitoring tasks of the FLAGs is not always very clear.
- ✓ Delegating other tasks to FLAGs may require that they are nominated as Intermediate Bodies (IBs). In such cases (Greece, Portugal) MAs are not sure if all FLAGs apply selection criteria in a fair and balanced way and may lack the experienced staff to support FLAGs’ designation as IBs.
- ✓ FLAGs are not always capable to swiftly adapt to new regulations (e.g. change from EFF to EMFF), there are sometimes different interpretations of the CPR provisions by DG MARE and DG AGRI.

Proposals for improvement include:

- There should be a clearer and more uniform interpretation from the Commission about the definition of (F)LAG roles.
- The Commission should take a clearer position as to whether designation of (F)LAGs as IBs is recommended.
- In countries with different levels of FLAG capacities, designation as IB could start with some pilot groups.

Checking reasonableness of costs of CLLD projects

- ✓ The discussion focused on the checks that MAs considered necessary to verify if project costs were “reasonable”, including the need to receive three quotes for services or products.

Issues included:

- A lack of personnel with knowledge/experience (e.g. in public procurement procedures).
- Poor communication along the delivery chain.
- Variability in rules and contradicting systems.
- Proportionality – time spent on checks can cost more than the money saved.
- A balance is needed between cost versus quality.
- Special problems of remote areas (limited service provision, generally higher costs).

- ✓ There is a need for simple rules at national level laying out which public procurement procedures apply.

Solutions included:

- Less gold plating - keeping procedures simple (fewer layers) and harmonised where possible.
- Not changing rules between periods, especially when they work.
- Lists with maximum unit prices for certain costs (construction works, websites etc.).
- More sharing of information between and within MS.
- Better communication between FLAGs and administration, training and guidance provided from the beginning.

NATIONAL NETWORKS

For the first time, the meeting included a special session for representatives of the National Networks of fisheries CLLD. These Networks vary greatly in terms of organisational model, scope of activities and budget (as a comparison between the [Spanish](#) and [Estonian](#) NNs demonstrates, but they are essential to improving FLAG work and the implementation of local strategies).

National Networks Overview

	Network Type	Time Frame	Estimated Budget
BG	Not operational yet	Foreseen 2018	
CY	MA taking up NN function	Operational since 2015	€100 000 whole period
DE	Networking activities by MA	Planned mid-2018	
DK	MA taking up NN function	Operational since 2015	
EE	Fisheries Information Centre	January 2016	€5M whole period
ES	External consultancy under MA	March 2010	€200 000 per year
FI	The same as NRN	December 2015	€900 000 whole period
FR	Run by a regional administration	Foreseen April 2018	€200 000 whole period
HR	Informal NN supported by MA	Operational mid-2017	€1M whole period
GR	Under preparation	June 2018	Budget to be confirmed
IE	MA taking up this function	Operational since 2015	no budget assigned
IT	Run by an external consultancy	October 2017	€2M whole period
LT	Informal NN supported by MA	November 2015	€16 500 per year
LV	External body same as NRN	2010	€ 360 000 per year
PL	MA taking up this function	Foreseen in 2018	€ 10 000 per year
PT	Informal network	2017	
RO	Two informal FLAG networks	2015 and 2017	
SE	The same as NRN	November 2015	
SI	The same as NRN	Operational since 2015	€ 350 000 per year
UK	MA taking up this function	Operational since 2015	no budget assigned

In the next financing period, the tasks of the network support units in fisheries CLLD should perhaps be more clearly defined.

Some key NN activities include:

- ✔ Training for FLAGs and stakeholders, e.g. on the development of LDS.
- ✔ Sharing specific expertise between FLAGs (thematic, but also administrative issues).
- ✔ Linking FLAGs with other actors, taking a broader view on the fisheries sector.
- ✔ Helping FLAGs to identify additional funding sources/tools.
- ✔ Developing specific communication tools for FLAGs or using existing ones (e.g. myFARNET).
- ✔ Stimulating exchange between FLAGs, especially around sea basins.
- ✔ Creating synergies with activities of National Rural Networks targeting FLAGs and providing a bridge to other CLLD Funds.

SEA BASIN EXCHANGES

Atlantic

Example of cooperation project: [Morada Alántica](#)

- ✔ FLAGs from Spain and Portugal are already involved in this project promoting different types of cuisine from around the Atlantic and a network of marine-related museums.
- ✔ Promoting Atlantic gastronomy, restaurants and maritime museums has good potential, but with many different partners the project could become very complex (e.g. a common website for all Atlantic FLAGs).
- ✔ Spain would take the lead in encouraging MA support for Atlantic cooperation, starting with the organisation of a meeting for Atlantic FLAGs within the next FARNET seminar in autumn 2018 seminar in autumn 2018.

Mediterranean and Black Sea

Example of cooperation project: [Diving Tourism](#)

- ✔ As shown by the cooperation project from Greece, it is important to make effort to keep up established relationships and avoid falling into a “one-shot” logic.
- ✔ There is interest in exchange and mutual learning between Bulgaria and Romania.
- ✔ A cooperation meeting of the Adriatic MS (Croatia, Slovenia, Italy) can be an important starting point for a longer lasting exchange.
- ✔ Networking of networks at sea-basin level was seen as useful.

Baltic

Example of cooperation project: [Seals and Cormorants](#)

- ✔ Participants agreed to initiate exchange on how FLAGs can support training of young fishermen around the Baltic (possibly leading to developing a joint training programme).
- ✔ The Swedish NRN and MA have agreed to take the lead, a suitable exchange platform is needed.
- ✔ The next meeting opportunity: the Annual Forum of the Baltic Sea Strategy in Tallinn, 6 June 2018.
- ✔ Other potential topics include promoting sustainable development goals (need to be realistic as to what can be addressed at the local level) and working with aquaculture; a will was expressed to work towards harmonising national rules for cooperation around the Baltic, at least for the next programme period.

