EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

RESOURCES
INFORMATION, COMMUNICATION, INTER-INSTITUTIONAL RELATIONS, EVALUATION AND PROGRAMMING

Brussels, 15/12/2010

NOTE FOR THE FILE

Subject: Meeting between the Regional Advisory Councils (RACs) and the Commission, 2 December 2010, Brussels

Introduction

Mrs Evans (Director General of DG MARE) opens the meetings and welcomes the RAC representatives. It is her first meeting with the RACs and she is very glad to listen to them in this very challenging period. In coming months, the Commission has to propose a new basic regulation on the CFP, devise a new market organisation and develop an external policy that is coherent with the internal CFP. Mrs Evans insisted on the fact that the reform of the CFP has to make sense in biological terms, in economic terms and in social terms. Because of the current economic and financial context, it must also be politically relevant. The purpose of the meeting is to have a strategic discussion on what could be the future role of the RACs. Before the Commission finalises its proposal, Mrs Evans proposes to organise another meeting with RAC representatives, possibly in February / March.

Mr Penas (Director for Policy development and coordination) explains that at this stage the Commission has not adopted any definitive position. In the current legal framework, RACs make recommendations before the Commission adopts its proposal ("upstream contribution"). This role should continue. How to improve it? In parallel, and in the event of a decentralisation of the CFP, what could be the role of the RACs downstream, i.e. in the implementation at the regional level of decisions adopted by Council/Parliament (and their needs to achieve these new tasks)?

In top of these questions, Mrs Evans asks the LDRAC and PELRAC representatives to explain how they see the role of the two RACs in the context of regionalisation.

Participants (Annex 1) present themselves and apologize for those representatives who are absent because of the weather conditions.

First round of interventions

Mr Cabral from the LDRAC reminds that the RACs are one of the major outcomes of the last CFP reform. They have contributed to an increased involvement of the stakeholders. The regionalisation proposed in the Green paper is something new whose modalities remain unclear. Member states will have an important role in that process and they will

have to take their responsibilities to make regionalisation possible. Mr Cabral regrets the lack of participation of Member States in RAC meetings. RACs should be a common home for all stakeholders but also for managers and scientists, whose active role is essential.

Ms Coers highlights some of the successes of the PELRAC since 2005, e.g. its proposal for a Horse mackerel long term management plan (LTMP). It was a stakeholder-led initiative, in cooperation with scientists. The RAC advice has been taken over by the Commission but the plan has not been adopted yet by the Council and the European Parliament because of institutional problems. However, the proposed plan has been used to set TACs.

The PELRAC has been less successful on the Mackerel plan. While its recommendations have been taken on board by the Commission, no agreement was reached with Norway and the coastal states. The fact that 5 major pelagic stocks are shared with Norway constitutes a limit for the RAC as it is an EU advisory body with no recognition by third countries. There is a need to involve stakeholders from third countries in an appropriate way, possibly under NEAFC.

Since 2005, the PELRAC has striven for reaching consensus among its members. On two occasions only, PELRAC recommendations have been adopted with dissenting opinions. Sometimes and in absence of a large support from its members, the RAC preferred not to take recommendations.

Regular participation of ICES experts in the PELRAC meetings is much appreciated. Debates in the RAC are based on the presentation of scientific advice and this contributes a lot to the success of the debate. ICES participation to RAC meeting should be secured in the future. The PELRAC would like to increase its cooperation with scientists and be given the financial capacity to commission ad hoc simulations.

Ms Clink underlines the specificities of the Baltic Sea and the strong political support for a regional approach (cf the Baltic Sea Strategy). The BSRAC has a very stable membership, with strong participation of the environmental NGOs. Cooperation with scientists and new Member States has been very good. In its early days, the RAC has been very active to improve control and compliance – this has been a successful process with recognition of the Copenhagen declaration in ICES advice. The RAC has been also involved in the preparation of several long term management plans and was recently invited by STECF to participate in the evaluation of the cod plan. Early involvement of the RACs is essential. Since last year, the RAC has worked on selectivity. These 3 different examples show the way forward.

Mr Nolan referred to internal debates within the NWWRAC and to the statement prepared by Sam Lambourn (annex 2). The general impression is that NWWRAC advice doesn't fit with the Commission's expectations (not the right time and format). Efforts made by the members are poorly appreciated and taken into account. Members of the RAC have the impression that they lose time and energy. The Commission has also capacity problem to cope with the multiplication of RAC recommendations. In the future, the relation between the RAC and the Commission should be more productive.

Mr Rodríguez highlighted the three priority areas of the work programme for the current year:

- The development of long-term management plans for demersal stocks in mixed fisheries in compliance with MSY objectives and ecosystem-based approach (starting with Celtic Sea);
- The establishment of a regional task force with scientists and Member States to identify data deficiencies for those stocks benchmarked for north western waters;
- Work with Community Fisheries Control Agency in developing and enhancing control and compliance in north western waters.

Ms Sébire underlined the specificities of the SWWRAC which make it very challenging (huge area, a large number of stocks, very different fisheries). The RAC has been very successful in developing management measures for anchovy. It has been invited by STECF to work on the preparation of 2 new plans (for sole and hake). The RAC has launched an internal evaluation whose results should be discussed in the next general assembly. Members would like to develop several projects (e.g. GEPETO) but the RAC has neither the human nor the financial capacity. Last year, the SWWRAC applied for INTERREG support without success.

Mr Brebner highlighted the fact that since the NSRAC has been established in 2004, discussions have enlarged upon new issues such as the EU environmental policy or maritime spatial planning.

M. Gil de Bernabe presented the MEDRAC which was the last one established. He insisted on the fact that Mediterranean fishermen organisations are well structured. According to him, accepting small minority organisations within the RAC would make it more difficult to operate. He also referred to third countries and to the need for increased cooperation. The RAC recruited a secretary general and will organise its work, taking into account what the other RACs have done so far.

Comments from Mrs Evans

Mrs Evans thanked the participants for their constructive comments. She made the following comments:

RACs should be proactive rather than reactive bodies. RACs should generate *ex ante* ideas for future and play an “upstream” role to influence policy in the right direction. RACs will have more influence in the long-term and more impact on the Commission and Member States if they work on strategic and directional issues rather than being defensive.

RACs are welcome to work on the development and implementation of long term management plans, with a particular focus on mixed fisheries.

Mrs Evans noted the unanimous perception of the RACs concerning the importance of the relationship between RACs and scientists (mainly ICES). However, she noted there are capacity constraints concerning the availability of scientists. It is essential to agree on a strategic approach to science. In a context of capacity constraints, Mrs Evans is

reluctant to consider autonomy to the RACs to commission scientific capacity, and maintains the opinion that the Commission should coordinate requests for scientific engagement. Mrs Evans did, however, invite the RACs to provide ideas on how to expand scientific capacity.

There are no preconceived ideas on the role of the RACs with respect to regionalisation. Mrs Evans admitted that the Commission does not have the capacity to deal with the volume of advice provided by the RACs within the present policy, and underlined that the future policy must come up with a simpler, less bureaucratic way to develop a more effective and functional role for the RACs.

In relation to the external dimension of the CFP, better coordination is needed between internal and external policies – this concerns also relation with stakeholders and the point raised by the PELRAC concerning the role of the RACs in negotiations with third countries.

Control and compliance is a priotity for the Commission. There is a role for the RACs in this area. The experience of the BSRAC is an interesting example.

The Commission should implement an ecosystem based approach for fisheries management. In the medium-term, there is a need to go beyond MSY and find the linkage between fisheries and the environment, i.e. how future CFP will fit into an integrated maritime policy.

Finally, a clear set of rules and procedures must be established to improve RAC governance. If the RACs are going to have more power there is a need to ensure that they are representative, accountable and transparent. The new status of the role will also have an effect on the financial arrangements, as sufficient funding must be ensured to facilitate any new working structure of the RACs. There is however a significant constraint in terms of how much money can realistically be made available.

Ms Coers, on behalf of all the RACs Secretariats, invited Mrs. Evans to attend individual RAC meetings in order to see the process of negotiations and discussions in preparation of advice. Mrs. Evans replied that, although this would be difficult to do in the short term, she would try to visit the RACs at some stage during her mandate.

Second round of interventions

Mr Aldereguía insisted on the relevance of having a Long Distance RAC that covers fisheries outside of the EU Waters. This represents 21% of the EU catches. The EU has an external fisheries policy because its fleets are fishing in all the oceans. European vessels are one of the main sources of data on high sea stocks. LDRAC is developing projects to increase collaboration between scientists and fishermen. LDRAC members should be involved in the development of LTMPs in the different RFMOs. In the future, the RAC could also develop contacts with stakeholders in third countries but more resources would be needed.

The level of commitment of LDRAC members could be seriously damaged if the engagement of the EC and Member States is not sufficient. But on other hand, the cooperation with the other EU Institutions such as the EP, the EESC and the Committee

of Regions is improving. The LDRAC wants to be proactive and is looking forward more effective cooperation with the Commission.

According to Mr Nolan the engagement of Member States with RACs in discussions on regionalisation is crucial for the success of the RACs. Access to scientific resources must be improved to allow the incorporation of relevant, professional content in RAC advice (e.g. long-term management plans). European and National funding, outside the RACs operational budget, could be considered to serve such purposes (e.g. EU stagiaire programmes, national secondees, engagement in EU projects).

Ms Coers expressed a sense of frustration from the fishing sector for some scientific-backed advice not having been taken into account by European Commission in the last few months (e.g. EU-Norway negotiations on a LTMP for North Sea herring). See the statement of Mr McSween attached in annex 3.

According to Ms Clink, cooperation between the BSRAC and the Member States is satisfory (e.g. BALTFISH project).

Mr Rodríguez said that enhance dialogue, communication and working practices with the Commission is needed. It was proposed that a template for a feedback mechanism was developed by the Commission to evaluate and assess the quality of RAC advice and how this advice has been included into proposals.

Mr Cabral asked for more flexibility regarding the composition of the executive committee.

Comments from Mr Penas

Mr Penas worried about the apparent divorce between some RACs and some Member States. It is important to have administrations and scientists in the process – especially if we want to move towards a more decentralised CFP. Partnerships between scientists and fishermen are essential but it is important to make better use of limited resources. It is not possible to increase indefinitely the scientists' workload.

The Long Distance RAC is a special case: scientific advice is available only few weeks before decisions are taken in international organisations. It is important that LDRAC members understand that RACs cannot be lobbies that influence multilateral negotiations. They should rather have realistic expectations and focus on the strategic issues. A suggestion for instance would be to work on the development of management and conservation measures for Atlantic swordfish in view of ICCAT meeting next year. Concerning the lack of attendance by the Commission to LDRAC meetings, Mr. Penas said that there is a limited number of staff travelling all year round and there is a need to optimise resources.

Mr. Penas understands the frustration of the Pelagic RAC with relation to the horse mackerel, but this is due to disagreements on the allocation of competencies among EU institutions. He took good note of the North Western Waters recommendation to enhance communication practices and he committed to making better efforts in trying to give motivated reasons to their replies. But Mr Penas emphasised that consensus does not guarantee that the Commission will take into account RAC advice.

Presentation of the evaluation on the RAC financial framework

Mr Papaioannou made a comprehensive presentation on the Final report produced by The Evaluation Partnership titled "Interim Evaluation on establishing EU financial measures for the implementation of the Common Fisheries Policy and in the area of the Law of the Sea 2007-2013". This report was completed in August 2010 and is now under review by the European Commission and will be published soon. (see annex 4)

Mr Papaioannou said that the timing of this report was in-line with the ongoing CFP reform procedure and that its outcomes would contribute to the process. The Commission will consider possibilities to increase financial support and improve flexibility in the management of the grants but this will depend on parallel discussions on the next financial perspectives and on reform of the EU financial regulation.

Currently provisions on the eligible costs are in the Council decision 585/2004 and can be modified only by co-decision. While it seems logical that the political and strategic issues related to the RACs will be adopted by a co-decision procedure of the Council of Ministers and the European Parliament, for practical reasons it might be better that details about the financing and the functioning of the RACs are adopted by Commission's decision.

Ms Coers and Mr Rodríguez asked how much money had been spent up to 2010 in relation to the amount of allocated to the functioning of the RACs for the period 2004-2011 as stated in Council Decision 2004/585/EC. Mr Papaioannou replied that the Commission would determine the exact figure and report back to the RAC Secretariats.

Mr Nolan requested the exact timeframe for the implementation of any proposed increase to the operational budget (e.g. to 300,000 Euro). Mr Papaioannou said that such an increase doesn't necessitate a modification of the legislation but on the corresponding budget being available. In relation to flexibility on the implementation of multiannual grants, this poses a legal problem, which requires a change of the financial regulation and the type of grant awarded to the RACs. Any changes to the existing legal basis will be postponed until the future of the CFP reform is decided.

Commission priorities for 2011

Mr Papaioannou said that the Commission had not yet finalised the table with proposals for 2011. Timing for consultations will depend on the final calendar of CFP reform. The CFP package should be composed of an overarching communication, a new basic regulation, a communication on external policy and a new CMO regulation. It is the intention to have this ready for May 2011, although the proposal related to future funding may be decided in July 2011. The idea is to have one single fund for the joint management of future Common: Fisheries, Aquaculture and Maritime Policies.

The calendar for LTMPs and transposition of RFMO decisions will depend on inter-institutional negotiations with the EP and the Council. .

Mr Aldereguía expressed the wish of the LDRAC to be associated to the reflexions on the future external CFP. The RAC will ask for a meeting with the Directorate in charge with external relations.

The meeting was adjourned at 13:00.

Emmanouil Papaioannou

ANNEX 1 - PARTICIPANTS:

RACs representatives

Ms. Aukje Coers, executive secretary of the Pelagic RAC

Ms. Sally Clink, executive secretary of the Baltic Sea RAC

M. Conor Nolan, executive secretary of the North Western Waters RAC

M. Alexandre Rodríguez, policy coordinator in the North Western Waters RAC

Ms. Joanna McGrath, assistant in the North Western Waters RAC

M. Antonio Cabral, chair of the Long Distance RAC

M. Carlos Aldereguía, executive secretary of the Long Distance RAC

Ms. Marie Sébire, executive secretary of the South Western Waters RAC

Ms. Priscilla Fourcade, former assistant of the South Western Waters RAC

Ms. Aurélie Drillet Rougier, new assistant of the South Western Waters RAC

Mrs Erika Monati, assistant of the Mediterranean RAC

Mr. Esteban Groupera, member of the Mediterranean RAC

Mr. Gil de Bernabe, member of the Mediterranean RAC

European Commission

Ms. Lowri Evans, Director General, DG MARE

Mr. Ernesto Penas, Director, DG MARE

Mr. Emmanouil Papaionannou, Head of Unit F2, DG MARE

Ms. Viktoria Nikolaou, DG MARE

Ms. Amalia De Diego y Vega, DG MARE

Ms. Isabelle Viallon, DG MARE

ANNEX 2 – STATEMENT OF MR LAMBOURN, CHAIR OF THE North Western Waters RAC

North Western Waters RAC

What do we want from Regional management?

Note for discussions with Director General Lori Evans

Brussels, Thursday 2nd December 2010

Dear Director General,

You are aware that we have argued, in our response to the CFP consultation[1], for a radical decentralisation of the CFP.

We see this as the way out of blunt and ineffective measures and away from over-complexity and micromanagement. It would involve a move towards regional management and a transfer of responsibilities to stakeholders and in particular the fishing industry.

Regional Management

We held a meeting in Dublin the 28th of October to progress our thinking on what management with a strong regional dimension might look like. We were assisted by experts such as Prof. Long of Galway University who kept us right on the legal issues.

We are quite clear that the broad strategic decisions should remain with the European institutions. However, areas such as technical measures, discard reduction, long term management plans, even setting TAC levels would best be done at regional level.

We are aware that this is sensitive legal territory but from our point of view, the key participants in any form of regional grouping would be:

[1] Opinion of the North Western Waters Regional Advisory Council on the Reform of the Common Fisheries Policy - Response to the Commission's Green Paper – 18/12/2009 – available in the publications section of the NWWRAC website: www.nwwrac.org

- The member states which hold fishing entitlements in a particular sea basin, along with
- Fisheries scientists
- Key stakeholders.

Rather than get bogged down in complex arguments over whether the *regional management body* will have formal or informal status, or what provision should be made to fast-track regional recommendations through the legislative system (without of course undermining the Commission's exclusive right of initiative), we decided instead to concentrate instead on what we would want regional management to *do*.

And in this we have made some progress. We would want the Regional bodies, however constituted, to:

- Develop customised solutions that would deliver more effective fisheries management, and help to achieve Maximum Sustainable Yield (accepting the limitations of that concept in mixed fisheries)
- Oversee a move away from prescriptive micro-management
- As part of that process, to achieve simplification of the CFP
- To move to responsive and adaptive management that would allow us to move rapidly away from failed measures and trial new approaches
- To make decisions at the lowest practicable level
- Progressively develop *delegated authority* as a means of transferring responsibilities to the fishing industry, within a framework of guarantees and safeguards
- Oversee the preparation, coordination development and approval of long term management plans, working closely with the RACs
- Maintain a close, continuous, dialogue and engagement with the RACs
- Select and refine management measures from the fisheries management "toolbox" to fit the circumstances
- Manage trans-boundary issues
- Work to ensure an alignment of economic incentives with management objectives so as to avoid perverse outcomes
- Develop a results focused management rather that a "legislate and hope it will work" approach
- Provide a forum bringing fisheries managers from the relevant member states, fisheries scientists and fisheries stakeholders into close and continuous contact to provide recommendations on the content of legislative proposals
- Improve the information base on which management decisions and recommendations are made

Sustainable Fishing Plans

We have also included in our CFP response the concept of sustainable fishing plans. We envisage this will be the delivery mechanism for a simplification of the CFP, a transfer of responsibility to those in the fishery and the basis for grass roots collaboration between scientists and fishermen.

Regional Advisory Councils

RACs have proven their worth. They vary in size, composition and approach but it is clear that the work they do is important. This is not to say that RACs couldn't be improved. The quality of RAC advice is heavily circumscribed by:

- The size and complexity of the fisheries in the RAC area
- The resources available to do the necessary research and preparatory work
- The extent to which the RAC engages with fisheries scientists.

At the very least we would like to see progress on these fronts in CFP reform. Within a regionalised CFP RACs would become more rather than less important, even if it is decided that RACs are not to be transformed into regional management bodies. The level of dialogue and engagement between regional management bodies and the RACs could be expected to be much richer and productive than the current relationship between the RACs and the Commission, which simply does not have the capacity to cope with the quantum of advice from all the RACs. There would be a better prospect of a genuine dialogue rather than the parallel monologues that we currently experience.

Yours faithfully,

Sam Lambourn

Chairman of the North Western Waters RAC

ANNEX 3 – STATEMENT OF MR IAIN MACSWEEN – PELAGIC RAC

The last reform of the CFP concluded that there were serious deficiencies inherent in the policy making procedure. In particular, the ability of stakeholders to participate in the process of formulating policy was deemed to be grossly insufficient. The solution adopted was the creation of RACs. This was meant to be a forum that gave stakeholders the ability to inform the Commission and Member States of their views regarding matters of concern to them. Whilst some hailed this as a revolutionary development, most regarded the creation of RACs as a positive evolutionary process. Most of us hoped that over the years the stakeholders' views would *increasingly* form part of the decision making process. Many of these hopes are in the process of being dashed. Evolution by definition means that the process should become more sophisticated and integrated. But now in many cases we find ourselves participating in a dialogue of the deaf. No one is listening. Or if they are they hear the message, but discount the content. Can we really be so wrong all the time that the vast majority of our suggestions are consigned to the wastepaper basket?

In the past year the Pelagic RAC has drawn the attention of the Commission to the situation with regard to North Sea herring where a revision of the annual TAC was supported by the science of the stock. It was not the industry that collected erroneous data but it pays the price for when scientists do so when this leads to advised decreases in TAC and then a second time when managers refuse to make an adjustment that would have rectified the fault as it became clear that the latest reductions were unnecessary. It is one thing is a mistake is made, which is only human, it is another thing to refuse to correct one when there is an opportunity for it.

In addition, the decision regarding blue whiting flies in the face of a serious science based analysis. And in the case of mackerel the Commission continues to base its negotiations with the Faroese Islands on a share of the stock that the industry finds unacceptable and which is not supported by any scientific basis.

We are most keen to maintain a dialogue with the Commission, but it has to be a meaningful one. That is not what we feel is happening at the present time. Continuing to make decisions without incorporating the advice and views of the sector simply takes us back to where we were 10 years ago. If it was unacceptable then, how can it be acceptable now? And how can we discuss developing the role of RACs in the context of the CFP reform, if a genuine collaboration is lacking at present? If you are willing to openly discuss and evaluate current practice with our RAC, then we look forward to follow up on that and look to the future as well.

Agenda

- Purpose of the evaluation
- Outcomes
- Processes
- Recommandations
- Evaluation questions

Project overview

- Purpose:
  - Comply with legal requirements.
  - Facilitate better informed decision-making.
- Main objective:
  - Assess activities implemented under Regulation (EC) 861/2006 in relation to the policy objectives.

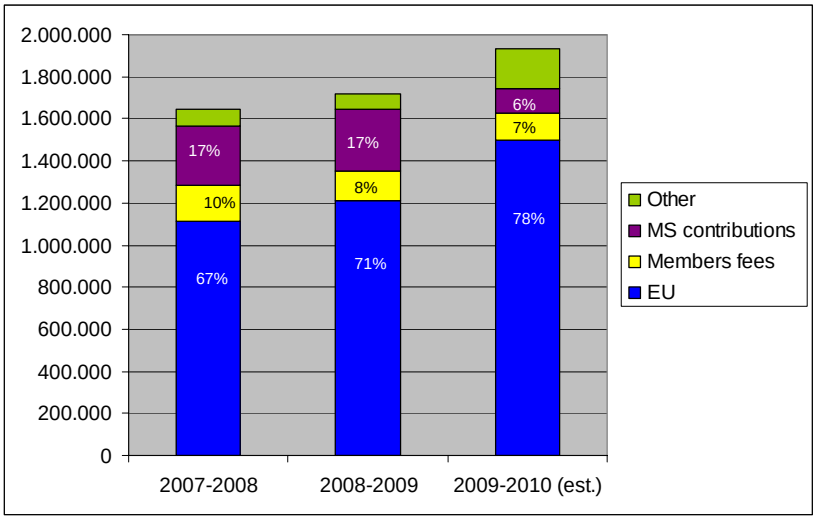
Area 3: Governance

- Outcomes
  - RACs serve a useful purpose.
  - Members firmly committed to RACs.
  - Frustration over extent to which Commission takes on board recommendations.

Area 3: Governance

- Processes
  - RACs heavily reliant in EU finance.
  - Higher EU contribution needed if RACs are to play a more strategic role.
  - Some rules and procedure to be further streamlined and clarified.

EU and non-EU contributions



Recommendations

1. Increase the maximum amount of the EU grant to €300,000.
2. Maintain the maximum 90% EU co-financing rate as well as the present composition of finance.
3. Explore possibilities to endow the RACs with a different type of grant that would enable multiannual planning and enhance flexibility while reducing the workload of the Secretariats.

Recommendations

4. Review financial management rules and procedures
   a) Harmonise the financial years of the RACs.
   b) Hold common meetings with the RACs at strategic points.
   c) Provide clear guidance on eligibility in advance of the financial year.
   d) Membership fees have to be received by the time of audit, rather than before financing.

10 evaluation questions

1. To what extent is it still necessary to co-finance by the EU the activities of the RACs in addition to financing from MS, regional authorities and members?

Conclusion:

- Since more than two-thirds of finance is provided by the EU, there is no scope for withdrawing this funding.

Recommendation:

- Potential role of RACs needs to be studied.

10 evaluation questions

2. To what extent does the quality of RAC advice and their ability to carry out their work depend on the timely provision of the EU co-financing taking into account the budgetary ceiling of EUR 250,000?

Conclusion:

- There is no evidence that the delays from request to payment have affected the quality of advice provided.

Recommendation:

- Harmonisation of RACs budgetary years.
- Formalising inter-RAC meetings.
- Improve feedback mechanisms regarding RACs advice.

10 evaluation questions

3. To what extent does the co-financing part of MS and the membership fees assure the necessary commitment of RAC members to their organisation and its mission?

Conclusion:

- MS and Members firmly committed to RACs.

Recommendation:

- Ensure that the degree of ownership is maintained.

10 evaluation questions

4. To what extent should the maximum percentage of 90% of EU co-financing of the eligible costs of the RACS be diminished or increased?

Conclusion:

- Up to 90% contributions by the EU are deemed appropriate.

Recommendation:

- An increase in the 90% rule is not recommended.

10 evaluation questions

5. To what extent is the maximum amount (EUR 250,000) of EU grant to the RACs sufficient for the implementation of their work programme?

Conclusion:

- The maximum amount depends on a significant change in the role and responsibilities of the RACs.

Recommendation:

- Increase EU maximum contribution to EUR 300,000 and adjust this for inflation on an annual basis.

10 evaluation questions

6. To what extent do the conditions for the disbursement of the EU grant as foreseen in the relevant legal provisions (for example the list of eligible costs) allow the RACs to make full and effective use of the EU financial support?

Conclusion:

- An annual operational grant is not the ideal vehicle for the EU financial support.

Recommendation:

- Further clarify and streamlining the applicable rules if no alternative to the operational grants.

10 evaluation questions

7. To what extent are MS contributions sufficient to cover part of the co-financing rate?

Conclusion:

- 17% MS contribution of the final eligible costs are sufficient complement to EU contribution. MS contributions have covered 65% of non-EU co-financing.

Recommendation:

- Maintain the MS contributions non obligatory and not standardize or impose minimum of maximum percentages.

10 evaluation questions

8. To what extent are membership fees sufficient to cover part of the co-financing rate?

Conclusion:

- 9% membership fees of the final eligible costs are sufficient complement to EU contribution. Member's fees have covered 35% of non-EU co-financing.

Recommendation:

- Not to impose any chances in the amount of membership fees requested.

10 evaluation questions

9. To what extent is it relevant to harmonise the MS contributions for all the RACs?

Conclusion:

- The harmonisation of MS contributions across RACs would be more problematic as the requirements of the RACs are different.

Recommendation:

- The level of MS contributions should continue to be left to the discretion of the individual RACs and Member States.

10 evaluation questions

10. To what extent is it relevant to harmonise the membership fees for all the RACs?

Conclusion:

- Members may be discouraged if fees are increased.

Recommendation:

- Membership fees continue to be left to the discretion of the RACs.