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Brussels, 29<sup>th</sup> July 2015

Mr Vladimir SUCHA  
Director-General  
Joint Research Centre  
Rue du Champ de Mars 21  
1050 Brussels  
BELGIUM

**Re: Joint Research Centre workshops on Marine Strategy Framework Directive (MSFD) Descriptors 1 & 2 and cross-cutting issues**

Dear Director Sucha,

On behalf of the Europepeche, the representative body for fishermen in the European Union representing around 45,000 vessels, both artisanal and large scale, 80,000 fishermen and counting 13 member organisations from 9 European countries, we would like to inform you about the EU fishing industry concerns regarding the closed-doors workshops that are being organised by the Joint Research Centre (JRC) in Ispra, Italy on 7-11 September 2015.

As a matter of fact, we sent an email dated 20<sup>th</sup> July 2015, requesting to participate as stakeholders in these workshops. In response to our email, the JRC indicated that the invitation solely concerned experts nominated by the Member States. The email continued stating that "stakeholders and the Member States will be informed on the outcome of the workshop in the upcoming WG Good Environmental Status (GES) in October 2015, in consistence with what JRC did in the previous WG GES (April 2015). At this meeting, the group you represent will have the opportunity to comment on the outcome of the workshop as also had on the review manual."

In this context we cannot accept that the European Commission's in-house science service organises workshops that are being held behind closed doors for stakeholders. EU stakeholders must play a crucial role in the development of all Descriptors as they contribute by bringing relevant information and expertise to those meetings. In addition getting stakeholder involvement helps to gain acceptance and understanding of the decisions taken by the EU. We must not forget that we are dealing with a European Directive which will be implemented through national legislation and therefore must be fully understood and respected by the industry.

The way JRC is dealing with the development of their Descriptors is completely opposite to the manner in which ICES is proceeding with the development of the Descriptors 3, 4 and 6. During the open workshops organised by ICES on mentioned descriptors, certain participants were not even aware or had little knowledge on the situation of Descriptor 1. This is truly worrying since Descriptor 1 (biodiversity) overlaps and influences decisions and progress on other Descriptors.

Against this background we urge the Joint Research Centre and the European Commission to work in a more transparent manner and to allow relevant EU stakeholders to participate in their workshops in order to develop sound and viable EU policies.

Yours sincerely,



Kathryn Stack  
Managing Director

*Copy: Director WENNING      Directorate C — DG ENV Quality of Life, Water & Air*  
*Director PENAS LADO      Directorate A — DG MARE Policy development and coordination*  
*Director WILKINSON      Directorate H — JRC Institute for Environment and Sustainability*