



# First experiences of the programming exercise

**Expert group on the EMFF  
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# General framework

- *Links between SWOT analysis, strategy, choice of UP/actions need to be strengthened;*
- *Significant problems with performance framework and indicators:*
  - choice and value of indicators;
  - use of mandatory indicators;
  - setting of realistic and achievable targets;
  - result indicators - direction of change should also be specified (+/-);

# Links between the OP and the fleet report & action plan(s)

- *Some action plans are missing at the moment (relevant MS informed), meaning that Section 4.6 of the OP should be completed.*
- *Conclusions of the fleet report & action plan have to be systematically reflected in the SWOT (UP1);*
- *Fleet information in context indicators is very often presented in a very aggregated manner. Indicators should be presented at fleet segment level (taken from the fleet report and action plan);*
- *Conclusions of the fleet report and in particular the action plan should be better reflected in the description of the strategy;*
- *Rebalancing should be more visible in result and output indicators for UP1; and*
- *The calculation method of the permanent cessation premiums is often unclear and/or incomplete.*

# Data collection

- *The ex-ante evaluation and SWOT analysis provided do not really evaluate data collection system set up by MS. Therefore, the outcomes and recommendations of the ex-ante evaluator are not really focusing on the DCF national system;*
- *The composition of the monitoring committee should reflect the extended scope of the EMFF, such as participation of scientific bodies or actors involved in DCF;*
- *The role of the DCF national correspondent as a beneficiary or intermediary body is usually not well explained;*
- *The guidance provided for preparing DCF parts in the EMFF Operational programme sometimes is not followed by MS.*

# CLLD

- *MS selecting CLLD as a measure, provided rather good information included in the draft OPs (eg. lessons from the past are taken into account, synergies with the EAFRD are usually well identified,);*
- *Problems detected so far, points to be strengthened:*
  - SWOT analysis should be focused and well connected with the strategy;
  - Selection criteria for areas should only give broad indications of where the areas could be located. Not too detailed;
  - Selection criteria for strategies also not too detailed: we need to know what the MS will look at but not the detailed criteria;
  - output indicator and Performance Framework: we want to know the strategies selected, not implemented (Corrigendum is expected soon);
  - result indicator: how many jobs will be created or maintained in general, not specifically in aquaculture. (Corrigendum is expected soon);
  - coordination mechanism with EAFRD and use of other ESI Funds (ERDF, ESF) should be better clarified;
  - Cooperation should be higher prioritised and managed linked to other CLLD activities;
- *Some MS have decided not to apply CLLD in the framework of the EMFF. This decision should be supported by the same logical process as the others (SWOT, analysis of needs, establishment of priorities in a transparent way)*

# Financial instruments

- *So far, very few MS (4/18) have indicated their intention to use financial instruments;*
- *The total amount of EMFF support to be channelled through financial instruments remains modest ;*
- *Main areas where FIs are envisaged:*
  - Innovation
  - Diversification
  - Productive investments in aquaculture
  - Processing and marketing
- *A justification for the choice of delivery mode by the MS should be provided in the OP (also if the use of financial instruments is not envisaged);*
- *FIs can be built upon earlier practice (eg. same fund manager);*
- *Piggybacking of other ESIF possible.*

## Horizontal principles – gender equality

- *very few OP reflect gender mainstreaming and how (fisher)women and women organisations were involved into the programming exercise;*
- *Even less if none of the OPs include activities in relation to gender promotion;*