



**Attn. Charlina Vitcheva  
European Commission  
DG MARE, J-II 99  
B-1000 Brussels**

**Ref. R-06-Ej.18 (2024-2025)/WG1-WG4-WG5**

**Subject: Request for clarification on work of the Africa-Europe Ocean Strategic Group and state of play of Roadmap 2030 report.**

Madrid, 9<sup>th</sup> of December 2024

Dear Director-General, Ms. Vitcheva,

We are contacting you on the occasion of the recent publication of a [report](#) laying out a proposal for the work of the [Africa-Europe Ocean Strategic Group](#) on Ocean Governance until 2030. The report was presented as an outcome of a multistakeholder dialogue that started in 2022, led by the “Africa-Europe Foundation”. This work was funded by DG MARE. The Strategy comes with a proposal of nearly 8 million Euros in funding to support activities planned through 2030.

The LDAC is concerned about the legitimacy of this report, the appropriateness of the course of action it suggests, and its level of influence in EU decision-making. Despite the importance of the issues addressed in the published document and their relevance to our advisory council, the LDAC has not been consulted. On 7 December 2022, we sent a letter to the Executive Director of the Africa-Europe Foundation, Mr. Walton, expressing the wish of the LDAC — representing key EU fisheries stakeholders—to participate in the strategy group known as the Blue Africa-Europe Task Force<sup>1</sup>. Despite several reminders and an acknowledgement of receipt of our request received in April 2023, we were never formally invited to attend any meetings nor were included in any consultation process in writing. Similarly, we note that the African non-state actors’ platform, AFRIFISH-Net, established with EU support through the FISH GOV projects, has not been formally included in their work.

Regarding the authorship of this report, this forum is a “think tank” not linked nor accountable to EU citizens and subject to a mix of public and private funding. In line with the “EU Better Regulation” agenda, we believe it would have been preferable for European Commission officials to handle this process directly. This approach would have avoided potential or perceived conflicts of interest, with public consultation procedures launched to facilitate participation and inclusiveness of concerned EU and African stakeholders.

Examining the report itself, we find it alarming that there is barely any reference to fisheries on the objectives of this Partnership, with only an indirect quote in the report to improve transparency and governance.

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<sup>1</sup> [https://www.ldac.eu/images/FINAL\\_LDAC\\_Letter\\_to\\_Africa-Europe\\_Foundation\\_7Dec2022.pdf](https://www.ldac.eu/images/FINAL_LDAC_Letter_to_Africa-Europe_Foundation_7Dec2022.pdf)



We wish to remind that fisheries are a main source of income and livelihoods from the ocean in most African Coastal countries, with key contributions to food security and GDP. The quasi-absence of fisheries in the roadmap is likely to result in its exclusion from future funding-related initiatives and financial instruments that will be created for such purposes, and its marginalisation in the face of other sectors of the blue economy.

Regarding financing and investment, the setup of a “*blue finance roadmap*” under intervention area 3 of the report will be key for the operationalisation of blue economy activities. The creation of a financial system through the Foundation needs to follow a transparent process as we are talking about EU public taxpayers’ money.

On the inclusion of business-related activities in the blue economy, the LDAC wishes to reiterate that fisheries should be at the heart of a sustainable agenda and roadmap on ocean governance and the blue economy in Africa, with adequate and sufficient funding. There are a number of problems, such as overfishing or the fight against IUU fishing, that need to be duly addressed and included in this report with the identification of potential remedial measures (e.g. creation of RFMO for small pelagic stocks, regional observers programme, implementation of FAO PSMA and FAO guidelines on sustainable small-scale fisheries, etc.).

In that respect, the LDAC has issued several recommendations and advice that we would like to help guide the EU strategy in the coming years. In summary, we are requesting the inclusion of fisheries in the report, recognising it as a vital component of the blue economy, and highlighting issues crucial for effective ocean governance.

In addition, regarding the way forward, we would like to ask about the next steps for DG MARE following the publication of the roadmap. How will this inform EU policy formulation in the areas of ocean governance and the blue economy in Africa? If there will be dedicated funding allotted for such purpose, how will priorities be defined?

We look forward to receiving your replies to our queries and reiterate our willingness to engage in ongoing dialogue and collaboration with the EU-Africa Foundation.

Yours faithfully,

  


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