

EYES WIDE SHUT

EU rules on transparency in fisheries subsidies are failing citizens – and the European Commission couldn't care less

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**AN
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INITIATIVE**



Summary

The European Transparency Initiative sought to introduce new rules to ensure that citizens can find out exactly how the EU budget is being spent, right down to the level of end beneficiaries of EU funds. In the case of the European Fisheries Fund, the promises made to citizens have not been fulfilled.

The system of financial transparency in fisheries subsidies is a complete mess. In the period 1994-2006, the European Commission took the responsibility for publishing data on end beneficiaries of EU funds. From 2007, the responsibility has been passed to member states. Some member states are publishing no data while others publish a variety of different data in a variety of different formats. There is no consistency and there are strong indications of serious errors and omissions. Fishsubsidy.org's Transparency Index, topped by Sweden, ranks member states according to their compliance with EU transparency rules and best practice in open government data.

Despite the problems in the data, fishsubsidy.org has collected and compiled what has been published into a new pan-EU database of EFF payments. The database contains information on 47,712 payments worth a total of €1,173,434,495. Spain accounts for some 40 per cent of all payments. It seems that some countries are under-spending or under-reporting their expenditure. Italy and Poland each account for some 12 per cent of planned EFF expenditure, but only 6 per cent and 4.1 per cent of disclosed payment information.

The single biggest measure by total value of payments is *Permanent cessation of fishing activities*, i.e. grants for scrapping fishing vessels. Unfortunately there is no requirement to indicate the registration number of the scrapped vessel, which makes it difficult to assess the extent to which the policy is contributing to a reduction of fishing effort in the fisheries where a reduction is most needed. This is a step backwards compared to disclosure practices in relation to the FIFG under which the Commission did release the fleet registration numbers of vessels that were the subjects of EU aid.

The Commission has retreated from its previous role as the coordinator of disclosure of data on fisheries subsidies. While DG Mare collected detailed information on the

end beneficiaries of fisheries funds for the period 1994-2006, from 2007 onwards, it has ceased to do this, despite having the legal powers to do so.

Weaknesses and failures in the financial transparency system for EU fisheries subsidies is undermining public control of expenditure, eroding accountability and legitimacy, and denying civil society of the data needed to evaluate policy implementation and impacts. EU institutions and member states must agree an entirely new framework for transparency in the EFF and its successor instrument, the European Maritime and Fisheries Fund.

Transparency: the promise...

In 2005, the European Commission launched the European Transparency Initiative (ETI). One of its aims was to allow EU citizens to find out exactly how the EU budget is spent, at the level of the end beneficiaries of EU funds. Siim Kallas (European Commissioner responsible for transparency at the time), speaking in March 2005, said:

“At the moment, in most Member States, data on end beneficiaries [of EU funds] are not publicly available. Frankly spoken, I was amazed about this information gap on the European level [...] I think these data must be made available and accessible in all Member States of the European Union.”

The European Parliament had been calling for greater budget transparency for several years and Commissioner Kallas's proposal was widely consulted upon and finally agreed by the college of commissioners. New provisions on transparency were introduced as part of the EU Financial Regulation agreed by EU Heads of Government in December 2006. Rules for implementation of the provisions were set out in subsequent regulations, with somewhat different rules for financial transparency for agriculture funds, regional, structural and cohesion funds, development funds, fisheries funds and so on. The implementing regulations for the fisheries funds are set out in Commission Regulation (EC) No 498/2007 of 26 March 2007.

The EU provides aid to the fishing industry under the European Fisheries Fund (EFF). These subsidies are divided among five 'priority axes':

1. Measures for the adaptation of the EU fishing fleet, e.g. scrapping or modernizing vessels

2. Aquaculture, inland fishing, processing and marketing of fishery and aquaculture products
3. Measures of common interest, e.g. infrastructure investments in ports, development of new markets, promotional activities
4. Sustainable development of fisheries areas
5. Technical assistance

The European Fisheries Fund is administered under the shared management of the European Commission and individual member states. Member states devise their own Operational Programmes with varying amounts of expenditure among the five axes, according to national circumstances and policy priorities. EU funds are accompanied by national co-financing at variable rates. Operational Programmes must meet the approval of the Commission. Administrative delays meant that EFF expenditure did not begin in earnest until 2009. The global economic crisis also contributed to the delays in expenditure, according to the Commission:

“...external factors linked to economic crisis made the absorption of the funds an even more difficult task for Member States. The economic and financial crisis hampered private investment and thus slowed down productive investment projects. At the same time, national austerity measures constrained national co-financing. Private beneficiaries in fisheries, aquaculture and processing sectors were most affected by the credit crunch which added to uncertain economic outlook for the fisheries sector in general.”¹

The planned expenditure under the EFF is set out in Council Regulation (EC) No 1198/2006 (27 July 2006). Planned expenditure for 2007-2009 was €1.6 billion, however delays mean that the actual amount spent was much less than this. According to the European Commission, total expenditure under the EFF from 2007 to 2009 was €652,962,370. This is the total amount of expenditure that ought to have been disclosed at the level of the end beneficiaries by the 30 June 2010.

The Commission has not yet published its annual report on the EFF, which contains actual expenditure totals for 2010. However, member states were required to publish data on the end beneficiaries of this expenditure by June 2011.

¹ European Commission (2011): Third Annual Report on Implementation of the European Fisheries Fund (2009)



PLANNED AND ACTUAL EXPENDITURE OF EU FUNDS THROUGH THE EUROPEAN FISHERIES FUND, 2007-13

Year	Planned expenditure € (2004 prices)	Committed expenditure € (nominal prices)	Actual expenditure € (nominal prices)
2007	538,501,708	0	0
2008	544,387,564	607,763,784	249,361,192
2009	551,260,557	626,982,387	175,029,780
2010	551,264,533	unknown	unknown
2011	552,866,449	unknown	unknown
2012	554,350,809	unknown	unknown
2013	556,368,380	unknown	unknown

EUROPEAN FISHERIES FUND, 2007-13

	EFF allocation 2007-13 € millions	Share	Actual expenditure, 2007-2009 € millions
Belgium	26	0.6%	16.0
Bulgaria	80	1.9%	11.2
Czech Republic	27	0.6%	5.9
Denmark	133	3.2%	65.7
Germany	155	3.7%	54.4
Estonia	84	2.0%	14.2
Ireland	42	1.0%	23.6
Greece	207	5.0%	113
Spain	1,131	27.2%	478
France	216	5.2%	135
Italy	424	10.2%	180
Cyprus	19	0.5%	4.3
Latvia	125	3.0%	38
Lithuania	54	1.3%	14.1
Luxembourg	0	0.0%	1.0
Hungary	35	0.8%	7.6
Malta	8.4	0.2%	2.7
Netherlands	49	1.2%	25
Austria	5.2	0.1%	2.1
Poland	734	17.6%	189
Portugal	246	5.9%	95
Romania	231	5.6%	32
Slovakia	21.6		4.2
Slovenia	13.7	0.5%	3.4
Finland	39	0.3%	15.6
Sweden	55	0.9%	31.4
United Kingdom	138	1.3%	49.3
Total	4,299		1,612

Source: European Commission: Annual Reports on Implementation of the European Fisheries Fund (various years)

According to the rules of the European Transparency Initiative set out in the EU Financial Regulation member states have the responsibility for publishing the names of beneficiaries and the amounts of EU funding allocated under the European Fisheries Fund. The European Commission DG Mare's website sets out the main obligations:

“European citizens are entitled to know how their money is used. Making public the information on who receives EU funding is one of the key objectives of the European transparency initiative.

The European Fisheries Fund (EFF) and its predecessor the Financial Instrument for Fisheries Guidance (FIFG) are managed by national authorities under a system known as ‘shared management’. Each year, countries that receive such funding must publish at least the following information:

- names of beneficiaries who have been allocated funding from EFF or FIFG after 1 May 2007.*
- name of the operation being funded.*
- the amount of public funding allocated to that operation.”*

Transparency in public funds is an important additional safeguard against fraud and abuse. Transparency also contributes to public accountability and the legitimacy of policies. Detailed data on the implementation of policies allows for improved evaluation of policies. In the case of subsidies to the fisheries sector, publication of detailed payment data for the period 1994-2006 allowed a number of important works of policy analysis and investigation:

- The FIFG 2000-2006 Shadow Evaluation** by the Poseidon Consultancy is the most comprehensive civil society evaluation of EU fisheries subsidies. One of its most important findings was that EU funds for vessel modernization were predominantly allocated to the largest vessels while funds for scrapping were most heavily concentrated on smaller vessels. The report found that EU subsidies were contributing to maintaining overcapacity in the fishing fleet.
- First Modernised, then Scrapped** by fishsubsidy.org found that the EU was paying modernization grants to vessels and a short time later was paying additional grants to scrap the same vessels.
- When Crime Pays** by fishsubsidy.org compared subsidies data with information on vessels convicted of illegal fishing and found many of the vessels that received subsidies were also convicted of illegal fishing.



- **Illegal, unreported and unregulated fishing in the EU: The case of Italian illegal driftnets** by Marevivo, Legambiente and LAV revealed the extent of the fiasco of EU grants for decommissioning illegal driftnets, showing widespread waste, fraud and abuse.

- **Looting the Seas II** by the International Consortium of Investigative Journalists looked at the political influence, global reach and criminal record of the Spanish fishing industry. The investigation revealed an industry heavily subsidized by taxpayers that has an extensive history of flouting rules and breaking laws.

Many of the issues raised in these analyses and investigations continue to be relevant in the context of the current EFF. Access to data on EFF payments is essential if civil society is to continue to play its role as a watchdog and to make a constructive contribution towards the improvement of public policy. We believe the current transparency rules are seriously flawed both in their design and in the way they are being implemented.

Transparency: the reality

Initially, the European Commission published a portal page of web links to member state government websites where the data on EFF beneficiaries could be found. We found that many of these links were broken, dead or led to pages where no data had been published. In November 2010 the Commission removed the list of links from its website altogether, citing a recent ruling of the European Court of Justice relating to the publication of beneficiaries of EU agricultural subsidies (9 November 2010: joined cases C 92/09 and C 93/09). In private correspondence with fishsubsidy.org, DG Mare has not indicated whether it plans to revise the regulations or resume linking to member state data sources. This is in contrast to DG Agriculture, which is currently consulting on proposed new rules for transparency in expenditure under the EU's common agricultural policy.

The overall result of the European Transparency Initiative as it relates to the European Fisheries Fund is a chaotic system of disclosure that makes it impossible to gather consistent, reliable and useful information on who gets what, and why. Investigative journalist Brigitte Alfter has already described the many shortcomings in an earlier fishsubsidy.org report **Slipping through the net: How EU countries evade new budget transparency rules** (2009). She concluded:

"The publication of names of beneficiaries represents real progress in

budget transparency but this has been accompanied by a reduction in the quality and detail of data and its fragmentation into dozens of often inaccessible sources. With the responsibility for publication of data - including the choice of data format - left to member states, European citizens are cast into a maze of different languages, formats, places and modes of publication."

This is the first detailed evaluation of EFF data disclosed under the European Transparency Initiative and it shows not only that the transparency rules for fisheries subsidies has been badly designed, but it is being very poorly implemented. If an objective of the ETI is to provide EU citizens with useful information about how the EU budget is being spent at the level of end beneficiaries, it is failing in respect of the European Fisheries Fund. Anyone who

sets out to follow the money trail across the EU will find dead links, data locked away in inaccessible PDF files and spread over a variety of different web sites, even within the same member state. Such data as is available is often ambiguous and incomplete. There is no uniformity of data across member states, making meaningful European comparisons impossible. Greece, Hungary, Luxembourg, Portugal, Slovenia published no data at all.

Transparency Index

In order to evaluate the compliance of member states with the requirements of the European Transparency Initiative and general best practice in transparency, we have created a scoring system based on a range of objective criteria relating

TRANSPARENCY INDEX			
Rank	Country	Score	Remarks
1	Sweden	87	Data in a really bad PDF format and missing payment year
2	Belgium	79	Information on both allocated and paid amounts from member state and EU. But data on measures is missing
3	Czech Republic	69	Information on allocated money for projects is missing
4=	Estonia	69	
4=	UK	69	17 projects have been redacted from former publication
6	Austria	68	
7	Lithuania	64	Some old projects (8) deleted from the list, really hard to find data on website
8	Latvia	60	Includes ID on recipients, good information on area
9	Malta	58	No names of beneficiaries, just vessel names
10	Finland	52	
11=	Bulgaria	50	
11=	Cyprus	50	
13	Spain	48	Lots of errors in data and missing projects
14=	Italy	46	Only includes two types of measure, which indicates missing data
14=	Slovakia	46	Include ID on recipients
14=	Germany	46	Suspect errors in data
17=	Ireland	42	No data has been published for 2009 or 2010
17=	Poland	42	No description of projects, no data for 2010
19	Romania	33	Suspect errors in data
20	Denmark	29	No info on website now, no data for 2010
21	Netherlands	26	Data for 2008 and 2009 not published, extraction very difficult, recipients are anonymous
22	France	23	Seems a lot of payments have disappeared
23=	Greece -		No data
23=	Hungary -		No data
23=	Luxembourg -		No data
23=	Portugal -		No data
23=	Slovenia -		No data



to the completeness and quality of data disclosed and the format of disclosure. We have confined the evaluation to the requirements of the ETI, which we believe to be deficient in a number of ways. For instance, we believe that vessels specific subsidies should identify the vessel involved by internal vessel registration (fleet register) numbers.

Initial analysis of EFF data

In spite of the many obstacles, fishsubsidy.org has compiled its own database of EFF payments, drawing on data published by member state governments. As at August 2011, the fishsubsidy.org database of EFF payments contains information on 47,712 payments worth a total of €1,173,434,495.

Spain accounts for 40 per cent of EU funds recorded in the EFF database. The next biggest beneficiary country is Romania, with 7.9 per cent. The distribution of expenditure in the EFF database is broadly in line with the distribution of funds in

budgetary plans for the 2007-13 period (see table above), though it seems that some countries are under-spending or under-reporting their expenditure. Italy and Poland each account for some 12 per cent of planned EFF expenditure, but only 6 per cent and 4.1 per cent of disclosed payment information, respectively. There may be an honest explanation for such discrepancies, but it is not clear what that might be.

At the very least it illustrates the problem of every member state following a slightly different protocol for publication of EFF payment data (and some member states following no protocol at all).

For 89 per cent of expenditure in the EFF database the policy measure under which the payments are made is indicated. The single biggest measure by total value of payments is *Permanent cessation of fishing activities*, i.e. grants for scrapping fishing vessels. Unfortunately there is no requirement to indicate the registration number of the scrapped vessel, which

makes it difficult to assess the extent to which the policy is contributing to a reduction of fishing effort in the fisheries where a reduction is most needed. This is a step backwards compared to disclosure practices in relation to the FIG under which the Commission did release the fleet registration numbers of vessels that were the subjects of EU aid.

The EFF database

Fishsubsidy.org has made all the data obtained available online at <http://fishsubsidy.org/eff>. The data is also available in Google Fusion Tables and as a single CSV file to download. The online EFF database allows searching by beneficiary name, recipient country, location (in the rare cases that this information has been provided by governments) EFF measures and actions. Search results can be filtered by year and by country. Search results can be reordered numerically by size of payment, or alphabetically by name of beneficiary.

The Commission's 'eyes wide shut' policy

Most member states have published a variety of different data fields, others have published partial data or no data at all and often the data field descriptions are different or ambiguous. The data is not consistent between member states and so it difficult to make meaningful comparisons between member states.

This is in marked contrast to the data for 1994-2006, which the Commission collected from member states and disclosed in a relatively consistent single dataset, following an access-to-documents request by Markus Knigge, a fisheries policy expert and a co-founder of the fishsubsidy.org project.

The main shortcoming of the data for 1994-2006 was that it did not include the names of end beneficiaries (neither companies nor individuals), however it did contain the unique internal registration number for each subsidised vessel. This allowed cross-checking with the Community Fleet Register (CFR), enabling information on the type of vessel and its home port to be known. For non-vessel recipients, no information was given beyond the municipality where the project was located and the amount paid.

In a remarkable development, we can reveal that while DG Mare collected detailed information on the end beneficiaries of fisheries funds for the period 1994-2006, from 2007 onwards, it has ceased to do so.

EFF PAYMENTS AS DISCLOSED UNDER ETI, BY MEMBER STATE

Country	Total amount €	Share	Number of payments	Average payment €
Austria	2,324,540	0.2%	158	14,712
Belgium	12,057,809	1.0%	57	211,541
Bulgaria	21,695,345	1.8%	36	602,648
Cyprus	356,973	0.0%	84	4,250
Czech Republic	7,704,142	0.7%	323	23,852
Denmark	73,544,954	6.3%	597	123,191
Estonia	57,654,596	4.9%	534	107,967
Finland	32,681,893	2.8%	1,705	19,168
France	53,068,848	4.5%	2,050	25,887
Germany	40,511,097	3.5%	612	66,195
Ireland	20,999,999	1.8%	44	477,273
Italy	70,666,644	6.0%	6,365	11,102
Latvia	32,818,771	2.8%	247	132,870
Lithuania	33,539,068	2.9%	230	145,822
Malta	2,178,807	0.2%	44	49,518
Netherlands	4,001,313	0.3%	100	40,013
Poland	48,336,999	4.1%	2,299	21,025
Romania	92,130,593	7.9%	123	749,029
Slovakia	5,180,257	0.4%	47	110,218
Spain	475,444,038	40.5%	31,021	15,327
Sweden	53,335,604	4.5%	632	84,392
United Kingdom	33,202,204	2.8%	404	82,184
Total	1,173,434,495	100.0%	47,712	24,594

Note that there is no data from the following countries: Greece, Hungary, Luxembourg, Portugal, Slovenia.



This is despite the fact that the Commission has the power to collect such information. Under Article 40 of Commission Regulation (EC) No 498/2007 of 26 March 2007 laying down detailed rules for the implementation of Council Regulation (EC) No 1198/2006 on the European Fisheries Fund, the Commission can require member states to submit very detailed information about the operations supported by the EFF, including names of end beneficiaries, measures under which aid was paid, dates and amounts of aid, total project costs, geographical location, Community Fleet Register number (CFR) of the vessels receiving aid and so on.

In a recent letter to Jack Thurston, Fisheries Commissioner Maria Damanaki confirmed that the Commission has not used these powers gather information on who gets what from the EFF:

“According to the applicable regulatory framework for the EFF, the Commission does not hold data on EFF payments at the level of the end beneficiary.”

Why does the European Commission no longer care to ask member states how EU fisheries funds are being administered? Is this a conscious decision, or incompetence or timidity on the part of DG Mare? Does the Commission simply prefer to look the other way, when it comes to the European Fisheries Fund? Since this is a change in policy compared to the period 1994-2006, when the DG Mare did monitor member state expenditure, why has no explanation been given?

DG Mare has the legal powers to request detailed end beneficiary data from member states under the European Fisheries Fund. Its reticence is in marked contrast to the approach taken by DG Agriculture, which collects very detailed end beneficiary data from member states each February under the Clearance of Accounts Trails System. This enables it to audit and control expenditure under the common agricultural policy and to provide a detailed evidence base for policy planning.

Besides failing to collect detailed data on how EU funds are being spent on subsidizing the fishing industry, the European Commission is also failing to perform a detailed assessment of the overcapacity in the EU fishing fleet. In part this is because many member states are not complying with the legal requirement to report on over-capacities. Accurate information on over-fishing and fleet capacity is essential if the EU is to bring fishing capacity into line with the availability

EFF PAYMENTS AS DISCLOSED UNDER ETI, BY MEASURE

Measure	Amount €	Percentage	Number of payments
Permanent cessation of fishing activities	282,877,843	24%	1,858
Temporary cessation of fishing activities	207,185,575	18%	37,622
Fish processing and marketing	142,710,103	12%	1,039
Aquaculture	140,209,176	12%	1,139
Development of new markets and promotion campaigns	55,431,201	5%	525
Fishing ports landing sites and shelters	55,028,428	5%	242
Collective actions	50,839,088	4%	292
Development of fisheries areas	20,233,907	2%	171
Pilot operations	19,940,091	2%	105
Investments on board fishing vessels and selectivity	17,907,453	2%	1,727
Inland fishing	17,641,338	2%	242
Protection and development of aquatic fauna and flora	12,592,648	1%	102
Technical assistance	10,969,892	1%	177
Small-scale coastal fishing	2,931,368	<1%	422
Socio-economic compensations for the management of the fleet	1,984,139	<1%	134
Modification for reassignment of fishing vessels	804,230	<1%	1
Unknown	134,148,016	11%	1,914
Total	1,173,434,495	100%	47,712

EFF PAYMENTS AS DISCLOSED UNDER ETI, BY YEAR

Date	Number of payments	%	Value of payments €	%
2007	3,522	7%	26,540,212	2%
2008	7,855	16%	112,072,164	10%
2009	20,470	43%	346,022,930	29%
2010	8,155	17%	206,628,519	18%
2011	1,047	2%	26,528,946	2%
Ongoing	33	0%	7,474,106	1%
Year unknown	6,630	14%	445,656,190	38%

of fish stocks. Without this information, counter-productive public aid will continue to be paid to vessels targeting depleted fish stocks, such as Atlantic blue fin tuna.

If the European Commission did decide to take an interest in how the European Fisheries Fund is being administered, what might be the results? Might it discover that vessels subsidized by the EU are targeting depleted fish stocks? Might it discover that EU funds are supporting illegal, unreported and unregulated fishing? Might it show that the EU is paying to scrap the same vessels that it has previously financed

through construction and modernization grants. Might it conclude that EU fisheries subsidies policies lack coherence with EU policies on fisheries conservation?

The EFF could be performing well, or it could be performing badly. We just don't know. And neither does the European Commission because it has not asked for the data, preferring to keep its eyes wide shut.

Policy recommendations

The system for achieving financial transparency in the European Fisheries



Fund is a mess. It needs a total overhaul, both in terms of the specification of what must be disclosed and how, and in systems to ensure compliance.

What should be disclosed? Our view is that more information is better. We would like to see the following information disclosed for every payment made under the EFF:

- Beneficiary name
- Fleet registration number for all vessel-specific payments (e.g. scrapping and modernization)
- Which fish stocks will be targeted, for all vessel-related subsidy payments
- Location (e.g. postcode or name municipality)
- Amount of EU funds allocated
- Amount of national funds allocated
- Amount of EU funds paid
- Amount of national funds paid
- Measure name
- Action description
- Date of commitment / payment

In what form should the information be disclosed? In line with best practice in open government data, all data should be disclosed in a common format that is machine-readable. For example, in a CSV file or XLS spreadsheets. Under no circumstances should data be published in PDF files. PDF files are not machine-readable and PDF is not an appropriate format for data. The specification of data files should be aim to ensure consistency across all member states so that data can be compared across the EU as a whole.

Who should be responsible for disclosure? For EU fisheries subsidies between 1994 and 2006, the Commission took the responsibility for disclosure. From 2007 the responsibility was passed to member states. Performance has been very poor indeed. Some member states have not published any data at all, others have published a variety of data in a variety of formats. We believe that until member states have shown themselves capable of complying with transparency rules, it would be better for the Commission to resume its

coordinating role. The Commission has the legal authority to take on this coordinating role but if it is unwilling to, then at the very least it should draw up a comprehensive and unambiguous set of rules following our recommendations above and should start being serious about ensuring member states comply with the rules.

About fishsubsidy.org

Subsidies paid to owners of fishing vessels and others working in the fishing industry under the European Union's common fisheries policy amount to approximately €1 billion a year. Fishsubsidy.org is a project of by EU Transparency, a non-profit organisation in the UK. The aim is to obtain detailed data relating to payments and recipients of fisheries subsidies in every EU member state and make this data available in a way that is useful to European citizens. The project is funded by The Pew Charitable Trusts, a non-profit foundation dedicated to improving public policy, informing the public and stimulating civic life.

COUNTRY BY COUNTRY ANALYSIS

This section summarises the process of obtaining data on expenditure under the EFF for each of the 27 EU member states.

Austria

Data extracted from: <http://www.landnet.at/article/articleview/66551/1/6844>
Data is published in PDF files, encoded using a secure system to try to prevent extraction of the data for analysis. We have extracted the data from the PDF files.

Belgium

Data for Flanders relating to FIFG payments (for the years 2007 and 2008), for EFF in 2009 and 2010 were downloaded from the following website: <http://lv.vlaanderen.be/nlapps/docs/default.asp?id=842>.
We have extracted the data from the PDF files. No data was found for Wallonia http://agriculture.wallonie.be/apps/spip_wolwin/.

Bulgaria

Data is published in a Microsoft Word file, dated 12 August 2011, on the following website: http://oprsr.government.bg/?page_id=5 For each project there are four data fields: (1) Total approved grant (Общ размер на одобрената безвъзмездна финансова помощ), (2) Advance payment (Авансово плащане), (3) Intermediate payment (Междинно плащане), (4) Final Payment (Окончателно плащане).

Cyprus

Data is published in a PDF file on the following website: http://www.moa.gov.cy/moa/opf/opf.nsf/DMLlist_gr/DMLlist_gr?OpenDocument&print&Click
The file only contains data on payments made in the first six months of 2009. No further data has been provided. Last checked 14 August 2011.

Czech Republic

Data is published as an Excel spreadsheet and downloaded from the following website on 4 July 2011: <http://www.google.com/url?q=http%3A%2F%2Ffeagri.cz%2Fpublic%2Ffeagri%2Fdotace%2Foperacni-program-rybarstvi-na-obdobi%2Fopatreni-osy-ii%2Fproplacene-projekty%2F&sa=D&sntz=1&usg=AFQjCNF9IbUafwOeFLVprNd4KlrlNN22xQ>
Each project has info on measure, name, project id and then 6 fields with payment amounts – all in national currency. We have used an exchange rate of 26.435 to calculate amounts in euros.

Denmark

Data was downloaded from the following website on 30 May 2010: <http://www.ferv.fvm.dk/stottemodtagere>
It covers EFF payments up until 12/31/2009. All this information has subsequently been removed and the website contains no information at all. The data contains information on ID for the recipient (though not for the project), project description, but no measures, either amount allocated or paid in national currency.

Estonia

Data is published in a single Excel spreadsheet. It was downloaded from the following website on 23 August 2011: <http://www.pria.ee/toetused/valdkond/kalandus/#>
According to the website it contains all subsidies until 6/30/2011. Data contains info on name of recipient, measure, project title, total allocated and total paid in Euro and EEK. It also contains info on allocation date and payment date.

Finland

Data is published as an HTML table on the following website: <http://snadi.mmm.fi/kaju/>. It was downloaded on 24 August 2011. The data contains information on measure, name, area, project description, year allocated, total amount allocated and total amount paid.

France

Data is published as an Excel spreadsheet on the following website: <http://www.europe-en-france.gouv.fr/content/download/9383/60372/version/1/file/liste%20beneficiaires%20FEP%2009-2010.xls>
It was downloaded on 19 August 2011. According to the website the data relates to payments up to 21 September 2010. The data contains information on name, region, municipality, project description, total project costs, amounts allocated from EU funds and paid from EU funds. There is no information on amounts allocated or paid in national funds and no information on the policy measures or project ID. The data downloaded in August 2011 differs from data previously downloaded. In some cases the differences raise initial causes of suspicion - some payments have been removed altogether and other payments have been reduced.

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COUNTRY BY COUNTRY ANALYSIS

Germany

Data is published in PDF files on the following website:
http://www.agrar-fischerei-zahlungen.de/Fischerei_empfaenger
Data was downloaded on 14 August 2011.
The PDF file indicates the data was compiled 6/27/2011. Data for 2008 and 2009 was previously published on the same site. The data contains duplicate ID numbers for certain projects. In some cases the amounts paid have been reduced from one year to the next. Sometimes there have been changes to the project title even though the name of the recipient is the same.

Greece

No data found. Last checked August 2011.

Hungary

No data found. Last checked August 2011.

Ireland

Data was published on the following website:
<http://www.bim.ie/>
It was downloaded in May 2010.
It contains only a list of decommissioning grants. The data has since been removed and as of 24 August 2011 the website contains no data at all.

Italy

Data is published as a PDF file on the following website:
<http://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/3408>
It was downloaded on 19 August 2011.
According to the website the data covers payments up to 30 June 2011. Only two types of measure are included: 11 and 12 (permanent cessation and temporary cessation). It seems very likely that some payments are not included in the data published.

Latvia

Data is published in a website search tool that provides a full search and CSV download:
https://eps.lad.gov.lv/payment_recipients/index
It was downloaded on 24 August 2011.
Information on region, other geographical location, name and ID of recipient, description of action, year of payment, amount paid in euro. There is a field for national government contribution which is empty in most cases.

Lithuania

The data is published as a spreadsheet on the following website:
<http://www.nma.lt/index.php?206113839>
It was downloaded on 4 July 2011.
It contains information on project ID, measure, project description, beneficiary name, amount requested and allocated both from member state and EU and in total. No information is provided on actual payments made.

Luxembourg

No data found. Last checked August 2011.

Malta

Data is published in three PDF files on the following website:
http://vafd.gov.mt/eur_traninit
It was downloaded on 23 August 2011.
Data contains beneficiary name (in most cases this is name of the vessel), short project description, incomplete information on measures and total amounts for allocated and paid.

Netherlands

Data is published together with farm subsidy data via a search tool on the following website:
http://www.minInv.nl/portal/page?_pageid=116,3595803&_dad=portal&_schema=PORTAL
No CSV download is offered. Data on payments in 2007-2009 are not available. Data on payments in 2010 was extracted by screen-scraping in August 2011. The data is a mess, with many zero payments and four anonymous beneficiaries.

Poland

Data is published in two Excel spreadsheets on the following website:
http://rybactwo.info/index.php?option=com_content&view=category&layout=blog&id=62&Itemid=99
The data was first downloaded on 5 July 2010 and as of 24 August 2011 no new data has been published. There is no data on payments made in 2010. Data on payments in 2008 contains information on name, location and amount paid. All payments are under measure 1.2. Data on payments in 2009 contains information on name, measure and amount paid.

Portugal

No data found. Last checked 24 August 2011.

Romania

Data is published as an HTML table on the website:
<http://www.madr.ro/pages/page.php?self=20&sub=2005>
It was extracted on 12 August 2011. According to website, the data was last updated on 5 August 2011.

Slovakia

Data is published in PDF files on the following website:
<http://www.apa.sk/index.php?navID=239>
It was extracted on 4 July 2011. The data covers payments up to 31 December 2010.

Slovenia

No data found. Last checked 24 August 2011.

Spain

Data is published in two large PDF files of more than a thousand pages each, on the following website:
<http://www.marm.es/es/pesca/temas/fondo-europeo-de-la-pesca/iniciativa-comunitaria-de-transparencia/>
Data was extracted on 12 August 2011 and converted into data format using Optical Character Recognition (OCR). As a result, there may be mistakes and misspellings due to the poor quality of the original data.

Sweden

Data is published in PDF files on the following website:
<https://www.fiskeriverket.se/vanstermeny/euochinternationellt/eustod/listaoverstodmottagare.47c5197de123343f05d2800010500.html>
The data was extracted on 24 August 2011. It contains information on recipient, measure, name, project description, allocation date and year and information on allocated and paid amounts from EU and Member State. All amounts in SEK but converted to euro for fishsubsidy.org's database.

United Kingdom

Data is published in two PDF files on the following website:
http://www.marinemanagement.org.uk/fisheries/funding/eff_success.htm
The data was downloaded on 22 August 2011. The website states the data are update twice a year. The data contains information on name of recipient, measure, project title, amount for allocated GBP from both EU and Member State and the total payment. Also contains information on the year of allocation and payment. 17 payments previously published have been redacted from the most recent government data, but are included in fishsubsidy.org's EFF database.



Relevant Legislation

THE OVERALL RULES on publication of the end beneficiaries of EU funds are set out in the EU Financial Regulation. Article 53 (b) requires member states to “ensure, by means of relevant sector-specific Regulations and in conformity with Article 30(3), adequate annual ex post publication of beneficiaries of funds deriving from the budget.”

Overall rules on the European Fisheries Fund are set out in Council Regulation (EC) No 1198/2006. Article 51 (2) requires that

“The Member States shall provide information on and publicise the operational programme and operations and the Community contribution. The information shall be addressed to the general public. It shall aim to highlight the role of the Community and ensure the transparency of assistance from the EFF.”

The rules for disclosure of beneficiaries of the EFF implementing Article 53 (b) of the Financial Regulation are set out in Commission Regulation (EC) No 498/2007 of 26 March 2007. The preamble sets out the objectives and justification of financial transparency:

“In order to enhance transparency regarding the use of EFF assistance, the list of beneficiaries, the names of the operations and the amount of the public funding allocated to operations should be published annually by Member States, electronically or otherwise.

Making such information accessible to the public aims to strengthen the transparency of the Community’s action in the area of the development of the fisheries sector, fisheries areas and inland fishing, to enhance the sound financial management of the public funds involved and, in particular, to

reinforce control of the public money used and finally to avoid any distortion of competition between beneficiaries of EFF measures.

Given the overriding weight of the objectives pursued, it is justified with regard to the principle of proportionality and the requirement of the protection of personal data, to provide for the general publication of the relevant information as it does not go beyond what is necessary in a democratic society and for prevention of irregularities.”

Article 31 outlines the requirement for publication of information:

“The managing authority shall be responsible for... the publication, electronically or otherwise, of the list of beneficiaries, the names of the operations and the amount of public funding allocated to the operations.”

