



To the attention of Mr. Mark Rutte  
De minister-president  
Ministerie van Algemene Zaken  
Postbus 20001  
2500 EA Den Haag

Paris, 14 June 2018

**Re:** Access request to the detailed list of Dutch beneficiaries of the European Fisheries Fund

Dear Sir,

BLOOM is a non-profit organization that is entirely dedicated to the ocean and to those who depend on its living resources for their professional activities. Our priorities are to protect the marine environment and preserve its resilience, while promoting fishing methods with low environmental impacts and high social output. We aim to help implement the UN's sustainable development goals for the ocean, including ending destructive fishing practices (SDG 14.4) and harmful subsidies that encourage overcapacity and overfishing in the world (SDG 14.6) as well as ensuring "*access for small-scale artisanal fishers to marine resources*" (SDG 14.B).

As you may know, BLOOM is currently leading a European campaign against electric fishing because of its detrimental impact on marine ecosystems and other fishers. Our research has brought to light a series of questionable public decisions and infringements of the EU law that we hope high-level political arbitrations will help resolve, at the same time as they may restore citizens' trust in institutions and political actions.

We turn to you today with the hope that you cherish transparency and compliance with legal obligations as much as we do. You may be aware that BLOOM has filed a complaint against the Netherlands on 16 April 2018, for non-compliance with EU regulatory requirements regarding the publication of the detailed list of beneficiaries of the European Fisheries Fund (EFF), i.e. all public financial transfers granted to the Dutch fishing sector between 2007 and 2014.

Making these data (all EFF expenditures) publicly available is of paramount importance because the EFF financial instrument covers the period during which most, if not all, Dutch beam trawlers were converted to electric trawlers. Being able to determine to which extent the development of electric fishing was supported by public funds has become a central issue of the public debate and of the European negotiations regarding the fate of electric fishing. Unfortunately, this list is not available on the website of the Dutch Ministry of Economic Affairs. On the contrary, we were able to find a list of subsidies granted since 2014 under the European Maritime and Fisheries Fund (EMFF), which overlaps with the EFF until 2016.<sup>1</sup>

The European regulatory framework states that EU Member States are subject to specific obligations regarding information, publicity and transparency of public aid granted under the EFF. So far, the Netherlands has failed to publish the full list of EFF beneficiaries with an indication of the name of beneficiaries, the name of operations, and the amount of public funding allocated to these operations.

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<sup>1</sup> [www.rvo.nl/sites/default/files/2017/05/20170430\\_Openbaarmaking\\_EFMZV\\_2\\_v1.csv](http://www.rvo.nl/sites/default/files/2017/05/20170430_Openbaarmaking_EFMZV_2_v1.csv).



In particular, Articles 51 and 59 of Regulation (EC) No 1198/2006 on the EFF stipulate that Member States have to publicise financial information provided to the fishing sector in full transparency and that the managing authority of an operational programme is responsible for transparency requirements.

We therefore call on your active cooperation to ensure that the Netherlands complies with legal European requirements and publishes the detailed list of Dutch EFF beneficiaries in a timely manner and in a reusable format compatible with the Open Government Partnership's standards.

We look forward to your prompt reply.

Respectfully yours,

Claire Nouvian  
BLOOM, founder and Board Chair