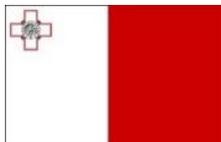


# Summary of the outcomes and recommendations of the Interim Evaluation of the EMFF Operational Programme Implementation in Malta

Evaluation conducted by EMCS



Maritime and Fisheries Operational Programme 2014-2020  
Part-financed by the European Union  
European Maritime and Fisheries Fund  
Co-financing rate: 75% European Union; 25% National Funds



*Investing in sustainable fisheries and aquaculture*

## Overview

This report presents the finding of the EMFF OP interim evaluation with particular focus on 3 main pillars, these being:

1. The relevance of the OP objectives
2. The effectiveness of OP implementation and management as well as
3. The effectiveness of implemented Measures.

## The Relevance of the OP objectives

The evaluation has found that the OP continues to be of relevance to the sector particularly with respect to its overarching objective that revolves around the need to ensure the survival of this industry and its long-term sustainability.

Furthermore, the socio-economic situation as highlighted in the SWOT analysis on the sector that was carried out back in 2013 and on which the original EMFF OP (2014 – 2020) was drafted is still very relevant today in terms of the need to:

- Ensure that the fishers attain enough income for an adequate quality of life
- Strengthen the whole value chain
- Undertake infrastructure investment
- Invest further in the aquaculture sector

# The effectiveness of OP implementation and management

## a. Ongoing efforts

MA's endeavours in relation to guidance and monitoring include:

- MA assistance both prior and throughout project implementation;
- Bilateral meetings
- Progress reports, and
- Informal ongoing assistance as and when required

Further efforts undertaken relate to:

- I. Monitoring Committee meetings-
- II. Written Procedures
- III. Training:

Furthermore, 36 Project Selection Committee meetings were held which numbers and timeframes required reflect call deadlines, as follows: 5 in 2016; 12 in 2017 and 17 in 2018. Furthermore, 2 other meetings were held in 2019 as at time of reporting.

# The effectiveness of OP implementation and management

## b. Specific Calls

Efforts in this respect are various and include:

- Drafting of application forms bearing in mind target beneficiaries and administrative burden vis-à-vis regulatory, reporting and binding requirements to be met
- Pre-launch and post launch campaigns
- Information sessions were held with potential applicants
- SMS notifications were sent to fishers or aquaculture producers, as applicable
- Printed adverts
- MA website including the new Mobile app was updated with open call information whilst also promoted ongoing operations
- Guidance to applicants as and when required
- One-to-one meetings

# The effectiveness of OP implementation and management

## *Restricted calls*

A review of applications submitted and awarded as at year end 2018 evidences that:

- A total of 13 calls were issued, and a total of 17 applications were received (for different measures). Calls targeted: Article 39 (1 call issued); Article 43 (3 calls issued); Article 29.1 (1 call issued), Article 47 (2 calls issued); Article 77 (2 calls issued); Article 76 (3 calls issued); and Article 80.1c (1 call issued). Of these:
  - 14 were awarded (1 awarded operation was withdrawn by applicant)
  - 2 were under evaluation,
  - 1 application was not awarded as deemed inadmissible

# The effectiveness of OP implementation and management

## *Open calls*

10 calls were launch targeting: Article 41.1 (3 calls issued); Article 41.2 (1 call issued), Article 30 (3 calls issued); Article 48 (2 calls issued) and Article 68 (1 call issued). Of these:

- 15 applications were submitted: 10 applications under Article 41.1; 1 application under Article 30; 3 applications under Article 48 and 1 application under Article 68, of which 7 were awarded. Rejected applications related to inadmissible applications.
- No applications were received for 3 of these calls (2 related to diversification and 1 related to replacement/modernisation of engines).

A review of inadmissible applications under Article 41.1 (6 applications) shows that proposed investments were ineligible due to restrictions imposed by the eligibility of costs determined in Articles 13 to 16 of Regulation (EU) 2015/531. Others provided incomplete applications (2 applications), with one application being submitted after the set deadline.

# The effectiveness of OP implementation and management

## *Open calls*

With reference to calls targeting fishers under Article 41.1, the needs of some of these fishers cannot be met through Article 41.1 in view of the conditions imposed and that some of these fishers may be misinterpreting the eligibility criteria of this measure notwithstanding the MA's various efforts undertaken to guide applicants accordingly (as highlighted extensively throughout this report).

It should be noted that in relation to achievement of planned operations under this measure, three operations were implemented as at time of reporting (thus fulfilling targets set for 2023), with an additional operation awarded in 2019 and as at time of reporting under implementation (thus exceeding expected 2023 target).

### c. Administrative process and administrative burden

Positive efforts undertaken by the MA to facilitate matters for all applicants:

- Distinguishing between obligatory documentation and required documentation at application stage
- Applications being translated to Maltese to address language barriers (targeting fishers)
- Accepting applications in handwritten format to remove additional burden/ additional barriers for access.

*Between 25% -100% of awarded operations under Article 41.1 would not have been deemed admissible or would not have been submitted as proposals should these actions not have been taken by the MA*

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A review of the application indicates:

- Information requested is meaningful and comprises the basic necessities which determine admissibility and eligibility in line with regulatory requirements.
- Fishers & aquaculture operators still perceive the application as discouraging and feel that the administrative burden remains considerable. Discussions with fishers evidenced:
  - Their need for assistance in compiling an application.
  - Involving external consultants was costly and not always proved useful.
  - Efforts undertaken by the MA to train individuals (from the DFA & MGOZ customer care) to assist fishers with the submission of applications were not sufficient.
  - The rolling calls and the possibility of such service being made available for a lengthier period of time may result in the provision of more meaningful assistance.

*The evaluation however shows that reference to the administrative burden generally relates to regulatory requirements and sound financial management of operations.*

## MA's HR function

While the MA structure is deemed to be opportune, it is imperative that current vacancies are filled.

## Management and Control systems at Funds and Programme Division

The evaluation and the audit report on the topic in question evidenced:

- Adequate separation of functions and adequate systems for reporting and monitoring where the responsible authority entrusts execution of tasks to another body;
- Appropriate selection of operations with all projects reviewed being satisfactory and effective, with only some improvements are needed
- Provides adequate information to beneficiaries
- Effective system in place to ensure that all documents regarding expenditure and audits are held to ensure an adequate audit trail.

## Current State of Play

Overall, Malta has exceeded its pre-set targets. Public expenditure paid for:

- UP1 stood at €3.65m, equivalent to 182% of the 2018 target.
- UP3 stood at €3m, equivalent to 103% of 2018's target.
- UP5 stood at €0.2m or 135% of 2018 target while
- UP6 resulted in 204% of 2018 target.

Re: UP2 – Particular factors that have contributed to achievement of output indicators but the non-achievement of the financial indicator (as explained in the AIR), with the MA confident that 2023 targets would nonetheless be achieved.

A review of the current results in relation to 2023 targets further confirm that Malta is overall in line to reach the 2023 set targets, particularly with respect to financial expenditure.

## Current State of Play

At project level the MA ought to be particularly cautious with respect to UP1:

- Measure 1.9 that relates to diversification as to date the 3 calls issued have proven to be unsuccessful;
- Measure 1.10 – as the target is set at 10 projects for temporary cessation with no call issued and hence no project approved to date. Calls are however expected to be issued between Quarter 3 and Quarter 4 of 2019 and thus targets expected to be achieved by 2023..

UP2 –Controls are currently underway in view of issues encountered as explained in previous sections of this report which may impinge on the implementation of this priority. Nonetheless, such adversity would likely impinge on the Progress registered with the MA having the capability to re-issue another call over the coming year/s. UP5 targets may be achievable if a shift in fund allocation from storage aid can be obtained.

## Recommendations

At Operational level

a. Calls

**Timing** - Timing can be an issue for the target audience to apply:

- Fishers highlighted their limitations to submit applications) during the fishing season, this being between the months of April and October. That said, the first three calls issued for fishers targeting Article 30, Article 41.1 and Article 41.2 were issued in mid-October with a closing deadline in end November. In addition, although two of these calls were again re-issued (Article 30 and Article 41.1) in January, only one application was received.
- Fishers may have not sought assistance since required investments were already undertaken by the time of call issuances.

It is opportune for the MA to undertake a rolling call approach as undertaken in 2019 especially for calls issued for fishers, where applicable.

*It should be noted however, that a major factor impacting the lack of demand and inadmissibility experienced under calls targeting fishers relates to the eligibility requirements making fishers ineligible to apply for certain calls.*

## Recommendations

At Operational level

a. Calls (cont.)

**Planning** - Steps were taken by the MA to help address this issue whereby in January 2017, pre-announcements and a pre-launch for the calls including an information session targeting fishers were undertaken. Such a stance also aids beneficiaries by further promoting the calls, ensuring a wider and timely outreach and provides beneficiaries with sufficient timeframes for planning project proposals prior to the calls being issued.

The rolling call approach would enable potential beneficiaries to better organise themselves and plan better when seeking to apply for Call/s. Discussions with the fishing cooperatives evidenced that such an approach was viewed positively by fishers.

## Recommendations

At Operational level

a. Calls (cont.)

**Hands-on involvement** - Discussions with fishing cooperatives have evidenced that the target audience does not comprehend the necessity for certain call requirements and the need for some information requested.

It is being advised that the MA considers organising a working group that incorporates influential individuals from each cooperative (or person/s of trust from each cooperative) in the drafting of Calls, where necessary. This will enable the target audience to own a call and subsequently be more aware of the requirements (and equally important better understand the importance of certain requests for information).

## Recommendations

At Operational level

a. Calls (cont.)

**Train the trainer** - It is being recommended that the MA considers involving individuals closer to the cooperatives and fishers (persons trusted by both parts) in the compilation of applications. This would ensure that fish coop members are well versed into the requirements of the call and facilitate matters for them to act as 'assistants' in aiding their colleagues. Furthermore, they would be the primary point of call with trivial issues, thereby alleviating pressure from on the MA, where possible.

Nota Bene:

- It is important that the MA remains the main point of contact for direct guidance to applicants should guidance still need to be sought by fishers.
- External representatives providing such assistance need to ensure that the information provided is in line with the guidance already provided by the MA.

## Recommendations

At Operational level

a. Calls (cont.)

**Database** - Discussions with the MA and with fishers show that a primary tool for informing fishers on Calls related to SMS notifications. In view of the importance and effectiveness of this medium, and following the limitations encountered following the GDPR regulations, it is being suggested that the MA once again seeks ways and means to obtain consent from fishers and continues to build its database of this important target audience to maintain its contact with them through this medium.

In view of the ongoing assistance and support provided by the two local fishing cooperatives throughout this evaluation process, the evaluators are confident that these could be roped in to assist the MA in the compilation of same.

## Recommendations

At Operational level

a. Calls

**Publicity** - Discussions with stakeholders and beneficiaries highlighted an issue with respect to the publicity requirements and with understanding the current ESIF VIG guidelines. The MA ought to consider issuing its own VIG (in line with ESI VIGs) with the aim of shortening the length of the document thus potentially making the document more user friendly for EMFF beneficiaries.

## Recommendations

At Operational level

b. Monitoring Committee

A review of actual participants has indicated that fishing cooperatives were not always present for such meetings, with the main reason being inopportune timing of the event (due to the fishing season). It is proposed that in so far as is possible, the MA should seek to organise the event when most opportune for such target audience – who have indicated that ideally such events are held between October and March.

Further analysis of the functions and responsibilities of the Monitoring Committee shows that in reality it is very difficult to target opportune timing since the winter months in Malta are still characterised by good fishing days in terms of weather permitting conditions and that the timeframes of these meetings are actually determined by the functions/responsibilities of the Monitoring Committee and EMFF programme management timeframes/processes/requirements in line with Article 113 of Regulation (EU) No. 508/2014.

## Recommendations

EMFF (2021-2027) programming period

- a. Discussions with the Department of Contracts have highlighted the importance for stakeholders to draw up yearly plans of their anticipated endeavours (with respect to the issuing of calls for tenders) and to subsequently notify the Department of Contracts accordingly so that they can better plan their work.

Since public procurement processes are subject to a number of factors which may impinge on its effectiveness such as the identification, timely planning and implementation of operations by beneficiaries, the identification of concrete project proposals at drafting of the OP stage could enable application of this recommendation for the future EMFF programming period. This will result in a more streamlined approach with respect to the issuing of tenders; a more efficient and effective approach that minimises delays.

## Recommendations

EMFF (2021-2027) programming period

b. Knowledge transfer

Apart from training that is provided to entities within public office it is also opportune to create 'train the trainer' courses such that there is knowledge transfer within the departments of public entities. This will ensure that knowledge is not lost once an individual moves on (to a different department/ industry).