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**Position Paper on the Future Regime of Autonomous Preferences  
for Raw and Semi-Processed Fishery Products Intended for EU  
Processors**

Current European Autonomous Tariff Quota for fishery products come to an end on 31 December 2012. EAPO welcomes the initiatives taken by the Commission to have a new regime in place by 1 January 2013. For the aim to have a single ATQ regime which embraces the three currently existing regimes and to use ATQs and suspensions as mentioned hereafter, the Commission is commended by EAPO.

EAPO fully supports the conversion of suspensions into ATQs under the new regime, replacing the existing ones out of Council Regulations 104/2000, 1062/2009 and 12/2010 and looks forward to the new single Regulation covering a period of three years. The other way around . converting ATQs into suspensions . must be avoided as suspensions are unlimited. EAPO is also in favour of the Commission aiming for a balance between the EU processing industry and the EU producers.

According to EAPO the currently existing ATQs for fishery products should not be increased. We are totally opposed to the increase proposed by AIPCE. To the contrary, in many cases there are EU production possibilities allowing a decrease. Also the bilateral agreements the Commission has with third countries should be taken into account as currently they are not included into the ATQs.

Below is listed some examples of products for which EAPO is opposed to an increase of the ATQ amount or for which new requests for additional ATQs are unacceptable. This list should not be viewed that EAPO is in favour of other increases not listed below:

- **Herring**: The North Sea herring TAC has increased substantially over the last number of years within the sustainability criteria.
- **Hake**: EAPO is running a collective campaign to increase the first sale price of the EU production. Additional tariff free imports are unacceptable in combination with such an initiative.
- **Flatfish**: The stocks fished by European producers are in an improving state, leading to important quota increases like in the North Sea, specifically the species primarily used for processing.

- Pangasius and tilapia: Substitute for a range of sustainably fished species used for processing and a major cause of concern for Community producers.
- Haddock: Community production of haddock has significantly increased both to west of Scotland and in the Celtic Sea. Allowing increased tariff free imports does not bode well for the first sale price to be obtained by Community producers.
- Mackerel: It is totally unacceptable to EAPO to be considering allowing any tariff free mackerel into the Community given the irresponsible actions of Faroes and Iceland in perusing an unrestrained mackerel fishery since 2008 with total disregard for responsible management and scientific advice. Rather than considering ATQs effective and meaningful sanctions should be immediately introduced.

EAPO finds that EU producers and processors should strive together to convince EU consumers to purchase more EU fishery products. Generally we are not opposed to a tariff free environment in principle but to achieve this requires as a prerequisite a level playing field for all producers both EU and third country. This environment does not now exist therefore ATQs are very necessary.

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