

**EAPO / AEOP**  
European Association of Fish Producers Organisations  
Association Européenne des Organisations de Producteurs dans le Secteur de la Pêche



December 2010

# Position Paper on the Reform of the Common Organisation of the Market



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## Introduction

The Common Organisation of the Market (COM) was established in 1970 as the first pillar of the Common Fisheries Policy (CFP). Consisting of a system of marketing standards, Producer Organizations (POs), a system of price support through intervention mechanisms, and a regime dealing with trade with 3rd countries, the objectives of the COM are:

- Finding a balance between supply and demand;
- Stabilizing prices in order to guarantee a minimum income and fair earning for fishermen;
- Improving the general competitiveness of the Community fleets on the world market.

The pursuit of these objectives will also contribute to a sustainable management of aquatic resources. Establishing the right framework of the future COM is essential to ensuring that the reformed CFP functions as intended; this in turn requires that the role of Producer Organizations is clarified and strengthened.

EAPO has over the past two years put forward a number of views and recommendations concerning the reform of the CFP in general and the COM in particular. EAPO is one of the main stakeholders of the CFP, representing a very high proportion of the EU's catching sector (producers) and production; therefore EAPO must play a key role in the consultation on the development of the COM (with the European Commission, the Member States and the European Parliament).

It is imperative that the future COM incorporates appropriate mechanisms to ensure a level playing field for the catching sector, i.e. the POs, in order to off-set the threats of globalisation and of the concentration of the retail sector buying power.



## Main issues to be addressed within the reform of the COM

### a Simplification

The current COM regulation (104/2000) is overly complicated for POs, the Commission and particularly for the national administrations implementing this regulation. The future COM must therefore be simpler in order for it to be effective:

- Desired results must be achieved in a less bureaucratic and time consuming way.
- There must be fewer regulations.

### b Financial support

EAPO welcomes the Commission's proposal for a single financial instrument for POs. Rather than being supported by the agricultural fund FEOGA, we think it is essential that POs have their own specific funding.

For the COM to be successful, the reform must provide financial funding in the following areas:

- Continuation and enhancement of the existing intervention mechanisms (withdrawal, storage, tuna for processing, etc.);
- Operational programmes – year to year;
- Restructuring to achieve a level playing field;
- Organizational, structural development and marketing of the products;
- Promotion of the products.

POs do not operate in isolation; they co-operate with other stakeholders in the fishing sector and more importantly in the chain to the consumers - in both EU-approved and more informal interbranch organizations - and consequently engage in numerous projects supported by the EFF. This funding must continue to be available in future, in addition to specific funding for POs.

### c Organisation of the sector and of the PO's

The POs, and EAPO as the overarching organisation, are, and must continue to be, the cornerstones of the COM. To support this, an increased budget is required than that currently provided by FEOGA.

The existing framework for the future role of the POs needs to be further developed to enable the POs to cope with the new challenges. It must be a framework which takes full account of the different levels of the POs in the EU. Please note however that we need a stronger framework rather than more detail legislation.

EAPO's members are keen to continue to adapt and enhance their work within a reformed COM and take their responsibilities very seriously in this regard.

The following points are of particular importance to EAPO and its members for inclusion in the COM:

- Sustainable management of members fishing rights;
- Quality and product development;
- Market intervention;
- Traceability / branding – consumer information;
- Marketing activities nationally / internationally;
- The social factor.

However, it must be borne in mind that there are significant differences between the operational levels of POs in different Member States. We recognize that in certain Member States the number of POs may be reduced and a stronger, more centralized structure becomes established. In others, particularly the “new” Member States, this reform is not possible and it remains to be seen how the PO structure will develop here; as always EAPO is ready to assist as required in this respect. Therefore an excessively rigid and accelerated development towards full blown PO structures and interbranch organizations can not be recommended.

#### **d** Development of the market intelligence

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EAPO is fully convinced, first and foremost, that a level playing field in the EU market is essential and that we should strive to have as much market knowledge and intelligence as possible. Whilst the creation of a Europe-wide “Observatory” is welcomed by EAPO, we are concerned that such an Observatory must deliver high-quality, robust information, well in time and at a high standard of reliability. EAPO should play an active role in the operation of this Observatory, providing it with up to date information in order to ensure that its output is helpful, accurate and informative.

#### **e** Intervention

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The total amount currently spent on intervention mechanisms for fish in the EU is a relatively small proportion of the total expenditures in the EU for support mechanisms for food production. EAPO therefore questions why this should change in a reformed COM.

EAPO has repeatedly called for the enhancement of the existing intervention mechanisms as these mechanisms form the basis of ensuring a certain basic income to the fishermen, particularly with increasingly competitive imports of fish and fish products into the EU. We would highlight the fact that the intervention mechanisms are more to the benefit of small scale fishers in local fishery-dependent areas than others in the fishing sector.

#### **f** Marketing standards and information to consumers

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EAPO considers that these items must be in the COM Regulation. Marketing standards must reflect the commercial reality of the products, must be relevant to the consumer and must be easily understood. EAPO is keen to engage in the work of defining the marketing standards and consumer information. We would propose that a specific working group is established between the Commission, EAPO and AIPCE on this to develop simple, fair, and acceptable rules benefiting all.

#### **g** Supply of the market

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EAPO would emphasize the importance of EU funding programs which allow the individual Member States to fund marketing initiatives promoting their own products.

All sources of supply – imports and EU production - must adhere to the same standards for production, supply and marketing . EAPO welcomes open markets provided there is a level playing field with equal standards for:

- Quality.
- Environment.
- Market Standards.
- Hygiene.
- Labour.