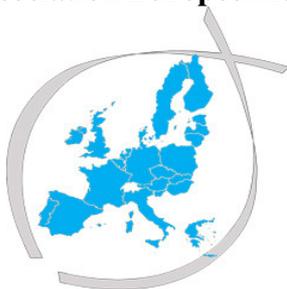


**European Association of Fish Producers Organisations**  
**Association Européenne des Organisations de Producteurs dans le secteur de la pêche**



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European Commission  
DG MARE  
Attn. of Mr. Fokion Fotiadis,  
Director-General  
Rue de la Loi 200  
1049 Brussels

EAPO09-34/1

Oostende, 2<sup>nd</sup> of December 2009

Dear Mr. Fokion Fotiadis,

Subject: strong protest against the European Commission's proposal for guide prices for fish and fish products for 2010.

**The European Association of Producer Organisations (EAPO) strongly protests against the European Commission's proposal for guide prices for the year 2010, COM (2009) 636 final.**

**The Commission proposes to decrease the guide prices for a range of important species, by between – 1% and – 6% based on observations of price movements in the first-sale prices in the European market.**

**For hake, whiting and haddock the proposal is – 6%, for cod and Norway lobster it is – 5%, for plaice and mackerel – 3%, and for herring - 1%.**

**The Commission states in its proposal:**

*“Consultation methods, main sectors targeted and general profile of respondents*

The Management Committee for Fishery Products and the Advisory Committee on Fisheries and Aquaculture.

Summary of responses and how they have been taken into account

Both Committees expressed largely concurrent views with the Commission's market analysis."

**The minutes from the ACFA WG III Markets' meeting 15. October states:**

"The chairman, however, said that the problem of decreasing consumption should not be generalised. Some participants (EAPO and AIPCE) believed that the system for setting prices was not reflecting the market reality and needed to be updated. In addition, EAPO stressed the urgent need to review the CMO and to consult ACFA properly before drafting the proposal.".....The Chairman asked the Commission, next year, to distribute the proposed guide price figures to ACFA for a proper consultation".

**It would appear that the Commission's "Summary of responses" does not reflect the responses.**

**We find that very serious.**

**The effects of the price proposals, if decided, are minimal for the pelagic species in the short term due to a relatively strong market situation, whereas the effects for the other species will be a general lowering of the first-sale prices paid to the fishermen.**

**The above is in particular illustrated in the market for flatfish (plaice, sole..) which has been under particularly heavy pressure during 2009 (due a.o. to imports of Pangasius from Vietnam). Some quantities have been withdrawn from the market, but more importantly: The buyers wait to bid for the product ("Dutch" auction system) until the price is just above the withdrawal price.**

**Over many years the guide prices were not increased in parallel with the general increases in market prices. This has resulted in a steady weakening of the safety net for fishermen and has resulted in very low prices in the market when supply is greater than demand (caused primarily by imports).**

**The Commission states in its press release on the guide price also, that in setting the prices "the interests of consumers" is an important factor. It is a fact that the general fall in first-hand fish prices in 2009 regrettably has had no effect on the prices paid by consumers at retail level.**

**We urge the Commission to reconsider the guide price proposal and at least to propose the same guide prices as those for 2009 to try to help stabilise the first-hand market for the catching sector.**

Sean O' Donoghue,  
President.

*This letter is also addressed to: Mr. P. Amilhat, Mr. C. Rambaud, Mr. J. Gonzales-Garcia.*