

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



**EAPO / AEOP**  
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Mr. Fernand Etgen  
*Chairman of the Agriculture and Fisheries  
Council of the EU*  
1, rue de la Congrégation  
2913 Luxembourg  
Luxembourg

EAPO15-27

Zeebrugge, 12 October 2015

Dear Sir,

**Subject: COM(2015) 344 – Proposal for a Council Regulation Opening and Providing for the Management of Autonomous Union Tariff Quotas (ATQs) for Certain Fishery Products for the Period 2016 to 2018.**

The European Association of Fish Producers Organisations (EAPO) represents 40 Producers Organisations (POs) from 10 EU Member States, with approximately 10,000 vessels of all dimensions, about 3.7 million tonnes of landings and a first sale value of around 3 billion euro. In this capacity we wish to present our position on the above subject to the Council of Fisheries Ministers.

Overall EAPO finds that the proposal takes into account the producers consultation and we particularly welcome the deletion of the shellfish ATQs. Our analysis of the evidence from the existing regulation 1220/2012 shows that more import of raw material is not needed. EAPO remains concerned that the ATQ regulation does not reflect the full scale of tariff free fish and fishery products imported into the EU through third countries trade agreements.

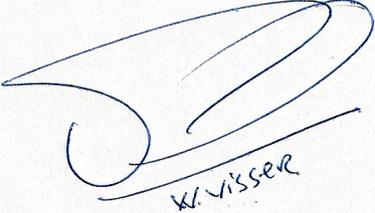
We find that EU producers and processors should strive together to convince EU consumers to purchase more EU fishery products. Generally EAPO is not opposed to a tariff free environment in principle, but to achieve this a level playing field for all producers both EU and third country, which does not now exist, is a prerequisite. In this respect we agree with the statement in a Consultant report on the Study on the Possibility to Ensure a Smarter Supply Policy for the Processing Industry and Evaluation of the EU Regulation n° 1220/2012, that there should be further processing before imports come into Europe.

In respect of Annex I of COM(2015) 344 EAPO has following specific comments:  
Haddock generally is subject to higher Total Allowable Catch (TAC) and therefore the EU production is likely to increase. We see no need for new ATQs for this product. Also for Cod the TAC is increasing and the introduction of the Landing Obligation will also contribute to the production quantity of these products. Accordingly EAPO is surprised to see increased ATQ's for Cod in the proposal. Another species to which these comments apply is Plaice. Having 5,000 tons of ATQ for flatfish is not necessary with the existing and increasing EU production possibilities.

EAPO notes that for Alaskan Pollock the ATQ has decreased substantially. However, taking into account that 70% of the contingent has been used, we find that a further decrease should be possible. For Herring the Russian and Nigerian embargoes mean that a higher first sale quantity of the European production in own territory is a prerequisite. In this respect we also refer to the recent letters our Northern Pelagic Working Group addressed to the European authorities.

We look forward to your positive evaluation of our comments and your continued support for the EU internal production and its marketing.

Yours Sincerely,



A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by the name 'P. VISSEER' written in a smaller, cursive script below it.

Pim Visser  
President.

CC: *Directorate-General B of the Council*  
*DG MARE: Christian Rambaud, Barbara Focquet.*