

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



**EAPO / AEOP**

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EAPO20-20

Oostende, 14 May 2020

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**Letter by e-mail attachment to:**

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Ms De Bleeker, Policy Officer Unit B3 Trade Negotiations ([Eva.DE-BLEEKER@ec.europa.eu](mailto:Eva.DE-BLEEKER@ec.europa.eu))

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**Subject: *EU autonomous tariff quotas for certain fishery products for the period 2021-2023***

As the Commission is starting to prepare the new set of autonomous quotas to replace those established in Regulation 2018/1977, EAPO is concerned that the ATQ regulation does not reflect the full scale of tariff free fish and fisheries products imported into the EU through third countries trade agreements and the General Scheme of Preferences. We find it important that an overall picture of the free trade possibilities is assessed before decisions are taken on ATQs. Overall EAPO is of the opinion that EU producers and processors should strive together to convince EU consumers to purchase more EU fishery products.

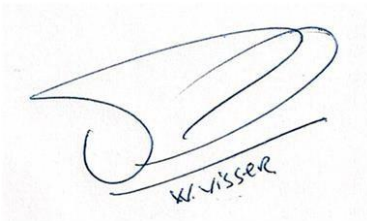
Generally, we are not opposed to a tariff free environment in principle, but this should also be based on maximising internal procurement. First, it is a topical matter of food security. The COVID19 crisis has shown the fragility of supply chains and the importance of favouring locally produced food. Second, sustainability of food products is one of the key components of the new Farm to Fork Strategy of the Green Deal, as explained in the Roadmap published on the 17th February 2020. Imports from third countries benefitting from ATQs, in addition to their transport greenhouse gas emissions, do not automatically follow as strict sustainability standards as the EU local products do. Furthermore, ATQs should also ensure that the differences between the EU fishers, operating in one of the most regulated fisheries of the planet and with top of the class socioeconomics and environmental standards, and third countries fisheries are considered. This last point is crucial to ensure a true level playing field and fair competition.

Therefore, there should be EU production preference, using the TAC and quota system as a reference to analyse the potential need for ATQs. We are convinced that the profitability of the EU fisheries sector and the well-being of many EU coastal communities can be substantially improved if this would be taken into account when deciding on free trade volumes.

EAPO finds that no products should be added to the new regulation compared with the current one and an overall decrease is required for the current products. EAPO recommends that for the period 2021-2023, reductions should be applied for products quotas when ATQs of the previous years have been underutilised. After several requests to the Commission to obtain utilisation information we have received data for 2019. Based on this and earlier experiences we recommend amending the ATQs that are not fully used, as shown in the table below. Also, further reductions should be applied when the imported products risk harming EU producers marketing opportunities (either because they are similar products or products used as alternatives). A decrease of ATQs is likewise recommended where EU TAC have increased, and stocks are in a particularly good state.

Please find in Annex 1 product specific remarks, and ATQs suggestions based on the available data (2015- 2017, 2019).

Yours sincerely,

A handwritten signature in blue ink, consisting of several loops and a horizontal line at the bottom. Below the signature, the name 'P. VISSER' is written in a smaller, simpler font.

Pim Visser,

President

**Annex 1: EAPO input suggestion on ATQ in relation with the annual amount for the period 2019-2020.**

| Order No      | CN code        | TARIC code | Description  | Annual amount of quota (tonnes) (1) | Quota duty | Quota period                                   | EAPO input                                |   |
|---------------|----------------|------------|--|-------------------------------------|------------|--|---|---|
|               |                |            |  |                                     |            |  | Quota recommendation for period 2021-2023 | Reasoning / comments  |
| 92.746        | ex 0302 89 90  | 30         | Southern red snapper ( <i>Lutjanus purpureus</i> ), fresh, chilled, for processing   | 1 500                               | 0%         | 1.1.2019-31.12.2020                            | Reduce ATQs because underutilisation      | Underutilisation (less than 60% of ATQs used in 2019)   |
| 92.748        | ex 0302 91 00  | 95         | Hard fish roes enclosed in the ovarian membrane, fresh, chilled or frozen, salted or in brine, for processing  | 5 700                               | 0%         | 1.1.2019-31.12.2020                            | 3000 tonnes                               | Underutilisation (less than 50% of ATQs used in 2015, 2016, 2017; less than 65% in 2019)  |
|               | ex 0303 91 90  | 91         |  |                                     |            |  |   |   |
|               | ex 0305 20 00  | 30         |  |                                     |            |  |   |   |
| 92.750        | ex 0305 20 00  | 35         | Hard fish roes, washed, cleaned of adherent organs and simply salted or in brine, for the manufacture of caviar substitutes  | 1 500                               | 0%         | 1.1.2019-31.12.2020<br>(* 1.1.2019-31.12.2020) | 1000 tonnes                               | Underutilisation (less than 50% of ATQs used in 2015, 2016, 2017 and decreasing to 36% in 2019)   |
|               | ex 1604 32 00* | 20         |  |                                     |            |  |   |   |
| 92.754        | ex 0303 59 10  | 10         | Anchovies ( <i>Engraulis anchoita</i> and <i>Engraulis capensis</i> ), frozen, for processing  | 500                                 | 0%         | 1.1.2019-31.12.2020                            | 0 tonnes                                  | Underutilisation (0% of ATQs used in 2016, 2017, 2019)  |
| 92.759        | ex 0302 51 10  | 20         | Cod ( <i>Gadus morhua</i> , <i>Gadus ogac</i> , <i>Gadus macrocephalus</i> ) and fish of the species <i>Boreogadus saida</i> , excluding livers and roes, fresh, chilled or frozen, for processing     | 95 000                              | 0%         | 1.1.2019-31.12.2020                            |   |   |
|               | ex 0302 51 90  | 10         |  |                                     |            |  |   |   |
|               | ex 0302 59 10  | 10         |  |                                     |            |  |   |   |
|               | ex 0303 63 10  | 10         |  |                                     |            |  |   |   |
|               | ex 0303 63 30  | 10         |  |                                     |            |  |   |   |
|               | ex 0303 63 90  | 10         |  |                                     |            |  |   |   |
| ex 0303 69 10 | 10             |            |  |                                     |            |  |   |   |
| 92.760        | ex 0303 66 11  | 10         | Hake ( <i>Merluccius</i> spp. excluding <i>Merluccius merluccius</i> , <i>Urophycis</i> spp.), and pink cusk-eel ( <i>Genypterus blacodes</i> and <i>Genypterus capensis</i> ), frozen, for processing | 12 000                              | 0%         | 1.1.2019-31.12.2020                            | 5000 tonnes                               | Underutilisation of ATQs (less than 20% in 2017, and 32% in 2019) and because marketing opportunities for EU producers should not be hampered by alternatives such as this one. |
|               | ex 0303 66 12  | 10         |  |                                     |            |  |   |   |
|               | ex 0303 66 13  | 10         |  |                                     |            |  |   |   |
|               | ex 0303 66 19  | 11         |  |                                     |            |  |   |   |
|               |                | 91         |  |                                     |            |  |   |   |
|               | ex 0303 89 70  | 10         |  |                                     |            |  |   |   |
| ex 0303 89 90 | 30             |            |  |                                     |            |  |   |   |

|        |               |    |  |         |    |                     |                                      |  |
|--------|---------------|----|--|---------|----|---------------------|--------------------------------------|--|
| 92.761 | ex 0304 79 50 | 10 | Blue grenadier ( <i>Macruronus</i> spp.), frozen fillets and other frozen meat, for processing   | 17 500  | 0% | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (only 52% used in 2019)   |
|        | ex 0304 79 90 | 11 |  |         |    |                     |                                      |  |
|        |               | 17 |  |         |    |                     |                                      |  |
|        | ex 0304 95 90 | 11 |  |         |    |                     |                                      |  |
|        |               | 17 |  |         |    |                     |                                      |  |
| 92.765 | ex 0305 62 00 | 20 | Cod ( <i>Gadus morhua</i> , <i>Gadus ogac</i> , <i>Gadus macrocephalus</i> ) and fish of the species <i>Boreogadus saida</i> , salted or in brine, but not dried or smoked, for processing | 3 500   | 0% | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (only 56% used in 2019)   |
|        |               | 25 |  |         |    |                     |                                      |  |
|        |               | 29 |  |         |    |                     |                                      |  |
|        | ex 0305 69 10 | 10 |  |         |    |                     |                                      |  |
| 92.770 | ex 0305 63 00 | 10 | Anchovies ( <i>Engraulis anchoita</i> ), salted or in brine, but not dried or smoked, for processing   | 2 500   | 0% | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (less than 55% of ATQs used in 2015, 2016, 2017; decreasing to 40% in 2019) |
| 92.772 | ex 0304 93 10 | 10 | Surimi, frozen, for processing   | 60 000  | 0% | 1.1.2019-31.12.2020 | 44 000 tonnes                        | Underutilisation (85% of ATQs used in 2015, 2016, and less than 70% in 2017)                 |
|        | ex 0304 94 10 | 10 |  |         |    |                     |                                      |  |
|        | ex 0304 95 10 | 10 |  |         |    |                     |                                      |  |
|        | ex 0304 99 10 | 10 |  |         |    |                     |                                      |  |
| 92.774 | ex 0304 74 15 | 10 | North Pacific hake ( <i>Merluccius productus</i> ) and Argentine hake (Southwest Atlantic hake) ( <i>Merluccius hubbsi</i> ), frozen fillets and other meat, for processing                | 25 000  | 0% | 1.1.2019-31.12.2020 |                                      |  |
|        | ex 0304 74 19 | 10 |  |         |    |                     |                                      |  |
|        | ex 0304 95 50 | 10 |  |         |    |                     |                                      |  |
|        |               | 20 |  |         |    |                     |                                      |  |
| 92.776 | ex 0304 71 10 | 10 | Cod ( <i>Gadus morhua</i> , <i>Gadus macrocephalus</i> ), frozen fillets and frozen meat, for processing   | 50 000  | 0% | 1.1.2019-31.12.2020 |                                      |  |
|        | ex 0304 71 90 | 10 |  |         |    |                     |                                      |  |
|        | ex 0304 95 21 | 10 |  |         |    |                     |                                      |  |
|        | ex 0304 95 25 | 10 |  |         |    |                     |                                      |  |
| 92.777 | ex 0303 67 00 | 10 | Alaska pollack ( <i>Theragra chalcogramma</i> ), frozen, frozen fillets and other frozen meat, for processing  | 320 000 | 0% | 1.1.2019-31.12.2020 | 250 000 tonnes                       | Underutilisation (less than 85% in 2017) and because used as substitute for EU products.     |
|        | ex 0304 75 00 | 10 |  |         |    |                     |                                      |  |
|        | ex 0304 94 90 | 10 |  |         |    |                     |                                      |  |

|        |               |    |  |        |    |  |               |   |
|--------|---------------|----|--|--------|----|--|---------------|---|
| 92.778 | ex 0304 83 90 | 21 | Flatfish, frozen fillets and other fish meat ( <i>Limanda aspera</i> , <i>Lepidopsetta bilineata</i> , <i>Pleuronectes quadrituberculatus</i> , <i>Limanda ferruginea</i> , <i>Lepidopsetta polyxystra</i> ), for processing                           | 10 000 | 0% | 1.1.2019-31.12.2020                          | 0 tonnes      | No shortage of raw EU material. Plaice, stock in the North Sea is categorized to be in a very good state. TAC increases are restricted to take into account the risk of overproduction. Tariff free imports of substitute products for this and other flatfish species are therefore counterproductive to the EU objectives.  |
|        | ex 0304 99 99 | 65 |  |        |    |  |               |   |
| 92.785 | ex 0307 43 91 | 10 | Pod (2) of squid ( <i>Ommastrephes</i> spp. - excluding <i>Todarodes sagittatus</i> (synonym <i>Ommastrephes sagittatus</i> ) - , <i>Nototodarus</i> spp., <i>Sepioteuthis</i> spp.) and <i>Illex</i> spp., frozen, with skin and fins, for processing | 28 000 | 0% | 1.1.2019-31.12.2020                          | 10 000 tonnes | Underutilisation (less than 60% of ATQs used in 2015, 2016, 2017, decreasing to 44% in 2019)  |
|        | ex 0307 43 92 | 10 |  |        |    |  |               |   |
|        | ex 0307 43 99 | 21 |  |        |    |  |               |   |
| 92.786 | ex 0307 43 91 | 20 | Squid ( <i>Ommastrephes</i> spp. - excluding <i>Todarodes sagittatus</i> (synonym <i>Ommastrephes sagittatus</i> ) - , <i>Nototodarus</i> spp., <i>Sepioteuthis</i> spp.) and <i>Illex</i> spp., frozen, whole or tentacles and fins, for processing   | 5 000  | 0% | 1.1.2019-31.12.2020                          |               |   |
|        | ex 0307 43 92 | 20 |  |        |    |  |               |   |
|        | ex 0307 43 99 | 29 |  |        |    |  |               |   |
| 92.788 | ex 0302 41 00 | 10 | Herrings ( <i>Clupea harengus</i> , <i>Clupea pallasii</i> ), of a weight exceeding 100 g per piece or flaps of a weight exceeding 80 g per piece, excluding livers and roes, for processing   | 8 000  | 0% | 1.10.2019-31.12.2019<br>1.10.2020-31.12.2020 | Reduce ATQs   | Underutilisation (<60% of ATQs used in 2015, 2016, 2017), and imports already occurring under other agreements  |
|        | ex 0303 51 00 | 10 |  |        |    |  |               |   |
|        | ex 0304 59 50 | 10 |  |        |    |  |               |   |
|        | ex 0304 99 23 | 10 |  |        |    |  |               |   |
| 92.790 | ex 1604 14 26 | 10 | Fillets known as 'loins' of tunas and skipjack, for processing   | 30 000 | 0% | 1.1.2019-31.12.2020                          | 0 tonnes      | This benefits to countries such as Thailand, China, Indonesia and Vietnam, criticised for their level of standards regarding sustainability of the resource. There is no shortage of such products caught by the EU fleet and therefore no reason to import 20% of tuna loins through such scheme. Moreover, such imports translate in job losses in the canning industry (cleaning and gutting). |
|        | ex 1604 14 36 | 10 |  |        |    |  |               |   |
|        | ex 1604 14 46 | 11 |  |        |    |  |               |   |
|        |               | 21 |  |        |    |  |               |   |
|        |               | 92 |  |        |    |  |               |   |
|        | 94            |    |  |        |    |  |               |   |

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|--|---------------|----|--|--------|-------|---------------------|--------------------------------------|---|
| 92.794   | ex 1605 21 90 | 45 | Shrimps and prawns of the species <i>Pandalus borealis</i> , and <i>Pandalus montagui</i> , cooked and peeled, for processing  | 7 000  | 0%    | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (51% used in 2019)                 |
|  |               | 62 |  |        |       |                     |                                      |   |
|  |               | 50 |  |        |       |                     |                                      |   |
|  | ex 1605 29 00 | 55 |  |        |       |                     |                                      |   |
| 92.798   | ex 0306 16 99 | 20 | Shrimps and prawns of the species <i>Pandalus borealis</i> and <i>Pandalus montagui</i> , in shells, fresh, chilled or frozen, for processing  | 4 000  | 0%    | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (16% used in 2019)                 |
|  |               | 30 |  |        |       |                     |                                      |   |
|  | ex 0306 35 90 | 12 |  |        |       |                     |                                      |   |
|  |               | 14 |  |        |       |                     |                                      |   |
|  |               | 92 |  |        |       |                     |                                      |   |
|  |               | 93 |  |        |       |                     |                                      |   |
| 92.800   | ex 1605 21 90 | 55 | Shrimps and prawns of the species <i>Pandalus jordani</i> , cooked and peeled, for processing  | 3 000  | 0%    | 1.1.2019-31.12.2020 | 2000 tonnes                          | Underutilisation (51% used in 2019)                 |
|  | ex 1605 29 00 | 60 |  |        |       |                     |                                      |   |
| 92.802   | ex 0306 17 92 | 20 | Shrimps and prawns of the species <i>Penaeus vannamei</i> and <i>Penaeus monodon</i> , whether in shell or not, fresh, chilled or frozen, not cooked, for processing   | 40 000 | 0%    | 1.1.2019-31.12.2020 |                                      |   |
|  | ex 0306 36 90 | 30 |  |        |       |                     |                                      |   |
| 92.824   | ex 0302 52 00 | 10 | Haddock ( <i>Melanogrammus aeglefinus</i> ) fresh, chilled or frozen with heads off, gilled and gutted, for processing   | 3 500  | 2,60% | 1.1.2019-31.12.2020 | 0 tonnes                             | Underutilisation (<55% of ATQs used in 2016, 2017)  |
|  | ex 0303 64 00 | 10 |  |        |       |                     |                                      |   |
| 92.826   | ex 0306 17 99 | 10 | Shrimps and prawns of the species <i>Pleoticus muelleri</i> , whether in shell or not, fresh, chilled or frozen, for processing  | 4 000  | 0%    | 1.1.2019-31.12.2020 | 0 tonnes                             | Underutilisation (<25% of ATQs used in 2016, 2017), |
|  | ex 0306 36 90 | 20 |  |        |       |                     |                                      |   |
| 92.804   | ex 1605 40 00 | 40 | Crayfish tails of the species <i>Procambarus clarkii</i> , cooked, for processing  | 4 000  | 0%    | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (32% used in 2019)                 |
| 92.762   | ex 0306 11 10 | 10 | Rock lobster and other sea crawfish ( <i>Palinurus</i> spp., <i>Panulirus</i> spp., <i>Jasus</i> spp.), live, chilled, frozen, for processing  | 200    | 6%    | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (31% used in 2019)                 |
|  | ex 0306 11 90 | 20 |  |        |       |                     |                                      |   |
|  | ex 0306 31 00 | 10 |  |        |       |                     |                                      |   |
| <a href="#">09.2784</a><br><a href="#">(3)</a> | ex 1605 10 00 | 21 | Crabs of the species 'King' ( <i>Paralithodes Camchaticus</i> ), 'Hansaki' ( <i>Paralithodes brevipes</i> ), 'Kegani' ( <i>Erimacrus isenbecki</i> ), 'Queen' and 'Snow' ( <i>Chionoecetes</i> spp.), 'Red' ( <i>Geryon quinque-dens</i> ), 'Rough stone' ( <i>Neolithodes</i> | 500    | 0%    | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (0% used in 2019)                  |
|  | 95            |    |  |        |       |                     |                                      |   |

|        |               |    |  |        |    |                     |                                      |                                     |
|--------|---------------|----|--|--------|----|---------------------|--------------------------------------|-------------------------------------|
| 92.822 | ex 0303 11 00 | 20 | Pacific Salmon, headed and gutted, frozen, of the species <i>Oncorhynchus nerka</i> (sockeye salmon (red salmon)) and <i>Oncorhynchus kisutch</i> , for processing | 10 000 | 0% | 1.1.2019-31.12.2020 | Reduce ATQs because underutilisation | Underutilisation (13% used in 2019) |
|        | ex 0303 12 00 | 20 |  |        |    |                     |                                      |                                     |