

European Association of Fish Producers Organisations

Association Européenne des Organisations de Producteurs dans le secteur de la pêche



EAPO / AEOP

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EAPO21-31

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Dear Madam,

Dear Sir,

Subject: EAPO position on the Commission initiative “CO2 emissions of engines – methodology for their reduction”

EAPO took note of the objectives of the European Green Deal since its launch in 2019. One of the objectives entails encouraging the reduction of CO₂ emissions of engines. Whilst the EU fishing sector always aims to contribute to a more sustainable way of maritime navigation, it is vital that certain aspects are taken into consideration when discussing this objective. EAPO considers that it is important to note that the EU fishing industry as a primary sector contributes to the worldwide requirement of a healthy and sustainable food supply and it does this with the lowest carbon footprint of all nutritious protein sources.

Alternative energy sources for fishery activities are mentioned in the Commission’s initiative. However, at present there are no fully-fledged energy alternatives. The techniques to power engines with use of hydrogen, ammonia, electricity and other are not sufficiently developed and most probably will not be operational before the end of the European Maritime, Fisheries and Aquaculture Fund (EMFAF) programming period until 2027. Generally, EAPO appreciates the possibilities of the EMFAF to aid emission reductions in the fishery sector. At the same time we wish to point out that while the Commission’s initiative mentions the installation of new engines with support from the EMFAF, it is regrettable that under this new fund not all categories of fishing vessels are eligible for such support.

EAPO reiterates that the EU fisheries sector is always looking for more sustainable options to operate, environmentally, socially and economically. For many years the reduction of GHG emissions, and of the consumption of fuel overall, has been a priority for the sector. It is also a result of policies and management decisions leading to an extensive fishing effort reduction and the improvement of the state of fish stocks. The development and use of more efficient fishing gear and engines, of new technologies – such as Cruise Control and ‘econo-meters’ –

and specific training for crew members equally contributed to the success of the EU fishing industry in reducing its overall CO₂-emission.

Taking into account the efforts undertaken by the sector EAPO considers that imposing strict measures to reduce the use of conventional fuel would create insurmountable obstacles for the industry. When aiming for the Green Deal objectives, consequences like unfair competition with third countries should be avoided. New measures should take into consideration the primary sector aspect of the fishery activities and avoid incremental production costs. For socio-economic sustainability purposes producers need a fair price and hasty decisions on further emission reduction could accordingly heavily increase the cost to consumers and restrict the availability of healthy and nutritious seafood.

EAPO looks forward to the Commission's feedback on this response to the consultation and obviously remains available to elaborate on its view if and when required.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'P. Visser', with the name 'W. VISSE' printed in small letters below it.

Pim Visser

President of EAPO