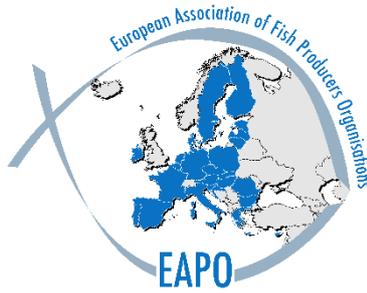


European Association of Fish Producers Organisations

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



EAPO / AEOP

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EAPO21-42

Oostende, 18 November 2021

Dear Madam,

Dear Sir,

Subject: EAPO feedback on EU- Green Deal: Revision of Energy Taxation Directive

Since its launch in 2019, EAPO has welcomed and supported the objectives of the EU-Green Deal in making the EU a climate-neutral continent by 2050. In fact, fisheries is a primary sector that provides for healthy, sustainably caught animal proteins with the lowest carbon footprint of all nutritious protein sources. Seafood has the ability to help drastically reduce greenhouse gas emissions linked to food diets. On top of this non-rebuttable fact, the EU-fishing sector has on its own initiative already made significant efforts in making its fishing activities even more sustainable. Therefore, not only should its products be promoted, but the Commission should also ensure that fishing operations can be sustained. Policies and Strategies can play an important role in this when they implement workable actions that are assessed against an impact analysis based on realistic key performance indicators. Taking this into consideration, EAPO is concerned about the revision of the Energy Taxation Directive under the EU-Green Deal.

Revising the Energy Taxation Directive forms part of a package of policy reforms to deliver on the objectives laid down in the EU-Green Deal. In order to achieve these energy and climate goals, the European Commission is in the process of developing several policies including dedicated options for the aviation and maritime sectors, with a focus on tackling fossil fuel subsidies and avoiding inconsistencies between taxation.

At present, no fully-fledged energy alternative energy sources for fishery activities have been created. Therefore, the EU-fisheries sector has been looking at other ways to increase the sustainability factor of its activities. 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 has helped to reduce significantly the overall CO₂-emission of our industry.

EAPO therefore calls upon the Commission to acknowledge the efforts undertaken by the sector. With the revision of the Energy Taxation Directive as in the proposed, an unfair rise in production costs for our fishermen would occur which inevitably should be passed on to the

consumer, risking a restriction of the availability of EU produced healthy and nutritious seafood. However, in price taker environment the fishing industry is hampered to pass on cost compensations up the chain. In other words, a fisheries fuel taxation would have a negative impact on the fishing companies, the fish supply and employment. Therefore, the EU should keep its tax policies aligned to existing international obligations in order to maintain the competitive position of our companies.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Esben Sverdrup-Jensen', with a long horizontal stroke extending to the right.

Esben Sverdrup-Jensen
EAPO-President