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Europêche/EAPO response to statement on seafood traceability signed by the Fisheries Control Coalition, IUU Coalition and Wholesalers & Retailers

Dear colleagues,

We have carefully read your statement co-signed with the IUU Coalition on Seafood Traceability. We are appalled to read wrong facts about the state of fish stocks and the call for mandatory cameras on board of fishing vessels at risk of not-compliance with the CFP (not just with the landing obligation). See the related paragraphs below.

“In recent years, the outlook for fish and fisheries in the North-East Atlantic and North Sea has been largely positive. Many commercially important fish stocks recovered, while overfishing in the region declined. This positive trend is going into reverse at the moment. Overfishing of individual fish stocks in this area is on the rise again.”

“We therefore call for comprehensive and cost-effective monitoring and enforcement of control measures with the help of mandatory remote electronic monitoring (including cameras) on EU catching vessels above 12 meters, as well as for those below 12 metres at risk of non-compliance with the Common Fisheries Policy, with the aim to monitor illegal discards and the bycatch of sensitive species.”

First, concerning the intensity of fishing, please read the latest press article from DG MARE whose headline states: *“Fisheries management review: less overfishing, but further efforts to protect marine resources needed”*

Indeed, in the new Communication on the state of play of the CFP, the Commission notes that *“the overall fishing mortality ratio fell below 1 in the North East Atlantic for the first time”*.

Furthermore, *“Stocks managed only by the EU, catch limits were set in line with MSY for all stocks where this ratio was available, except for Western Baltic herring”*.

Second, as regards the mandatory introduction of CCTV on board fishing vessels, we are sure you are well aware of the position of the fishing industry. It is true that some companies and fleets are doing efforts to install this technology to improve management and monitoring. However, a full imposition controlled by public authorities has different implications. On the one hand, we wonder how and why EU authorities should follow your advice and perform a risk analysis of non-compliance with the whole Common Fisheries Policy. On the other hand, we do not think cameras will solve the ill-conceived EU landing obligation which is not fit for the EU fisheries context. We feel that the EU decision-makers are trying to enforce a failed policy through intrusive control and monitoring tools. It is important to note that fishing nations such as Norway and Iceland, with landing obligation policies in place, are against the use of cameras and yet can perfectly control their fleets' operations.

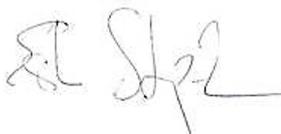
Furthermore, the statement lays down that *“there is a high risk of illegal [EU] fish and seafood in the supply chain.”* We would like to get clarification on such a statement which casts a shadow of non-compliance over the EU fleet. Opposite to the suspicion and mistrust placed on the fishing industry in the statement, the European Fisheries Control Agency (EFCA) figures show that despite the increase of inspections at sea, the actual number of infringements has been reduced to an extremely low 4% in European waters (2% in the case of the Atlantic) in 2020. Therefore, there is already a culture of compliance in the EU and a working control system in place. Something we should all be proud of.

Third, even more striking is that, being a statement on seafood traceability, there is no mention to the need to adopt clear rules relating to the establishment and traceability of lots that ensure that all fish products, whether processed or fresh, are equally subject to strong traceability requirements after the first sale, regardless of their origin. Furthermore, there is no reference to improve the level of quality and granularity from the information required for seafood imported products under article 58.6 (in line with the MAC opinion on EU Fisheries Control System 05.11.2018).

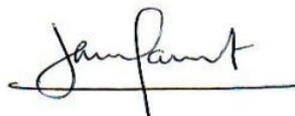
We understand the need to strike deals or common understandings with NGOs, but this should not be done at the expense of a different link of the value chain nor by communicating wrong data. This action will certainly damage consumers' confidence on the sustainability of EU seafood and the image of the fishing sector. This is very disappointing and will not help to build a solid relationship of trust and cooperation across the supply chain.

I hope you can transmit our message to the companies that have signed the statement.

Kind regards,



Esben Sverdrup-Jensen
President of the European Association
of Fish Producers Organisations (EAPO)



Javier Garat
President of the Association of National
Organisations of Fishing Enterprises in the EU

Cc: AIPCE-CEP