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Position Paper for the Meeting with Commissioner Damanaki on 14 July 2010
Brussels

1. CFP Reform

EAPO's response to the Green Paper on this subject refers.

In respect of governance we are pleased to see that our views on regionalisation, taking into account the specifics for the pelagic sector and without creating an extra layer in the decision making, are being put forward by the Commission.

EAPO would wish to elaborate on its views on a differential regime for small scale fisheries.

The requirement for more availability of data, more accuracy of data and the cooperation between science and industry to obtain these, is another topic EAPO wishes to address. Overall, this is about the science going forward under a new CFP.

It will also be useful to provide some clarification on EAPO's views on the structural and funding policy.

In respect of the external dimension, EAPO wishes to add to its green paper response that RFOs should be reviewed. RACs could for instance be organised under a reviewed NEAFC.

2. COM Reform

This subject is naturally of utmost importance to EAPO.

We repeatedly expressed our disappointment on the time required for the 104/2000 review and consider that the time has come to stop outside consultancy and work very closely and more directly with the PO's. This would also help to improve the method to determine guide prices, which currently takes too long.

Now that the COM reform runs in parallel with the CFP reform, an active EAPO engagement is required and therefore a specific EAPO working group has been created.

In respect of the contents of the relevant regulation, EAPO keeps on pointing out that there is no provision for a collapse in prices or an uncontrollable increase in operating costs (fuel price).

On prices there recently was a comprehensive presentation by the Commission in the ACFA WG 3. EAPO has found this very useful to demonstrate its reference to pricing at first sale.

EAPO is certainly encouraged by the Commission's view that PO's are to get a central role in the future and this should lead to the required active engagement of EAPO.

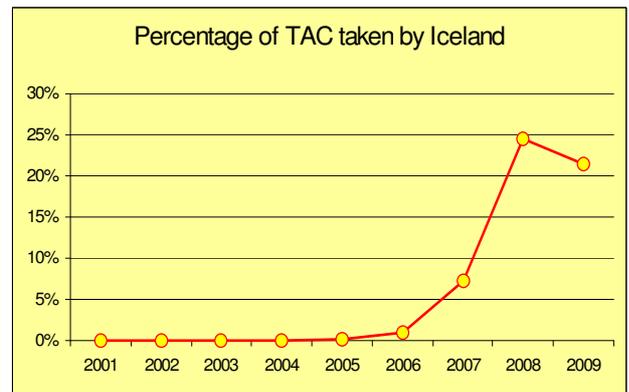
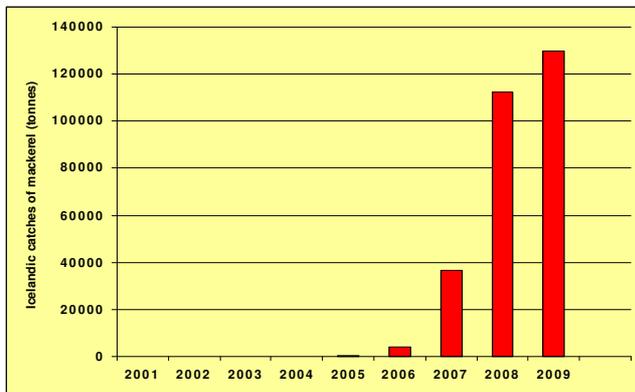
In respect of labelling, EAPO is pleased about the distinction between fresh and defrosted products, but the application of this rule should be improved.

For the specific issue on crab, EAPO wishes to mention the misinterpretation in southern Europe of the cadmium rule, which is detrimental to northern European producers. Spain and Portugal in the meantime agreed to the correct interpretation, but it takes very long to get this acceptance through the system.

3. Fishing Opportunities 2011

Following graphs will serve as a basis for bringing up the mackerel issue.

Icelandic Mackerel Catches 2001-09.



EAPO would also wish to expand the earlier provided topic 'Celtic Sea Effort Plan' to 'Effort Control Overall'. Existing plans containing effort control seem to be doing the reverse than the objectives of the plans.

We would also like to bring up the Pelagic RAC's proposal for North Sea herring in which EAPO's Northern Pelagic Working Group has had an important input.

As a final topic, EAPO wishes to address the communication on fisheries and the requirement to avoid harming the market.

EAPO
2 July 2010