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30<sup>th</sup> January 2015

**SUBJECT: Revision of the EU Regulation 1220/2012 on trade related measures to guarantee the supply of certain fishery products to Union processors from 2013 to 2015**

Dear Mr. Rambaud,

In reference to your letter dated 15<sup>th</sup> December 2014 regarding the regulation on trade-related measures aimed at ensuring the supply of certain products fishing processors in the EU, we would like to make the following observations.

As a general remark, Europêche is not opposed to a tariff free setting for certain fishery products. Nevertheless, we are experiencing a situation where EU fish stocks have recovered and led to an increase of EU fishing fleet catches and landings. Therefore, generally speaking, the EU catching sector is currently meeting the needs of EU processors, providing the best quality whilst maintaining the highest standards.

The European authorities have the responsibility to develop the potential of the European maritime economy and promote the consumption of EU products. The EU consumer must be informed about the origin and the method of production and encouraged to purchase EU fishery products. Our fishing fleet operates with the maximum respect for environmental, economic and social standards. It is necessary to ensure that imported products entering the Union market comply with the same requirements and marketing standards that Union producers have to comply with.

In any case, the European Union should give a clear signal that it does recognise the importance of the strong promotion of our European products.

More specifically, we would like to express our views on some fishery products included in the Regulation under review:

As we have repeatedly said in recent years, one of our main concerns (the companies with tuna freezer seiners) is given by Autonomous Tariff Quotas (ATQs) of **tuna loins**, currently 22,000 tonnes, with a tariff duty of 0%.



Our position is that this tariff duty of 0% should be eliminated from the new Regulation since it only serves to lower the price of the final product. Today, there is an excess supply of tuna in the EU market that is capable of guaranteeing the supply in quantity, quality and at a sufficiently competitive price for the processing industry not to need more benefits, to the detriment of the European producers. In this way, you can see that from September 2012 the price of tuna has dropped from 1800 €/t to 840 €/t (down 53.33%).

We would like to point out that the EU vessel owners are forced to sell the whole frozen tuna in other international markets because it pays better than the European market.

On the other hand, please note that it is in the gutting and cleaning of the whole tuna where the greatest number of jobs is required. Therefore, it is clear that increased imports of tuna loins to the EU will result in a loss of said jobs.

In short, Europêche believes that the maintenance (if not an increase) of these duties will certainly harm our ship-owners and favour our closest competitors, who, in many cases do not meet the standards imposed by the EU on regulation and control of fishing activities, working conditions, health standards, sustainability of resources, etc.

In this sense, in recent years many efforts have been made to promote the consumption of tuna, not only as being very beneficial to health but also as a product obtained from responsible fishing and in line with the sustainable exploitation of the fishery resources.

On the other hand, we are very concerned that any move from the EU authorities towards a greater liberalisation of imports of tuna loins can subsequently lead to a liberalisation of imports of canned tuna, which will have catastrophic consequences for the European tuna sector.

Therefore, we believe that the European Commission should oppose the granting of these duties. However, in the event that it is decided to be maintained, every effort shall be made for the imported tuna loins and other tuna imports, whether raw or processed, to be subject to the same control required for our own products landed in Europe, from both the European and foreign fishing fleets.

Concerning the **plaice stock**, it is in optimal shape; in fact TAC increases are restricted due to the risk of overproduction. Accordingly, tariff free imports of substitute products for this and other flatfish species are strongly not recommended. Furthermore, we would like to draw your attention to the fact that the ATQ for flatfish is granted to supply processing with raw product, however most imports are semi processed products (fillets) and the only EU processing is packing these fillets in boxes.



It is equally important to reduce the volume in the trade related measures of species such as **cod** and **hake** given the improved state of the recently adopted fishing opportunities 2015.


**Pangasius, Alaskan pollock** and **tilapia** are common substitutes for a number of sustainably fished species used for processing and a major cause of concern for the catching sector.

The reduction in the annual amount of quota of **herring** is of essence in this review, due to the significant fall in price caused by the Russian import ban.

Finally, we believe that a safeguard clause should be included in order to make the duty inapplicable if prices fall below 30% compared to the previous year in order to ensure that European producers are protected against speculation from the processing sector.

We trust that you will pay due attention to our views and we thank you in advance.

Yours sincerely,



Javier Garat  
President  
**EUROPECHE**

CC: DG MARE, Barbara Focquet.

