



EP(16)29

**FRANK SWARTENBROUX**  
**ADMINISTRATOR**  
**EUROPEAN COMMISSION**  
**DG HEALTH AND FOOD SAFETY**  
**UNIT E.7. – FOOD IMPROVEMENT**  
**AGENTS**  
**B-1049 BRUSSELS/BELGIUM**

Brussels, 15<sup>th</sup> March 2016

**Subject: Support to the Commission proposal to amend the EC Regulation No. 1881/2006**

Dear Mr SWARTENBROUX,

The European fishing industry has been following with great interest the revision process of the EC Regulation No. 1881/2006 as regards the establishment of a new regulatory framework for the control of mercury in food. It provides for the adoption of 4 tolerable levels of mercury 0.3, 0.5, 1 and 2 mg / kg and the subsequent process of assignment of commercial species of fish and shellfish within the new legal framework under consideration.

We support the coherence and suitability of the approach of the Commission for the following reasons:

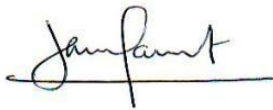
- In view of the official data, the values outlined in the proposal are more in line with reality for most species.
- The proposal is consistent with the protection of public health and is in accordance with the guidelines of the scientific opinion of EFSA which has proposed a reduction of the tolerable weekly intake of mercury. As the work of the Expert Group evolves, we are witnessing, in global terms, a downward adjustment from current ceilings, which will require an enhanced self-control and revision commitment from both the operators and the competent authorities.
- In addition, the proposal offers 4 different tolerable levels which favours greater accuracy and rationality when developing consumer recommendations. In any case, the recommendations for the consumer should not discourage fish consumption in the EU. Consumption rates are unfortunately below the desired level, as recognised by the Commission.

Finally, we must not forget the importance of achieving a more accurate proposal to avoid a possible increase in food waste. However, for this purpose, it is worth noting that in view of the new scientific data provided by the EU fish processors and traders, the EC should maintain the current mercury levels for key species such as hake (*Merluccius*). Any reduction in the mercury limits of fish species shall be accompanied by strong scientific data.

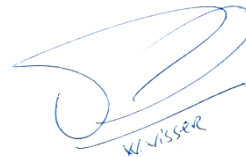
In view of the above, we urge the European Commission to complete the revision process of the EC Regulation No. 1881/2006 as soon as possible. This is of vital importance for the operators and companies we represent, since it is a unique opportunity to acquire a rational framework for the control of mercury, essential for the fishery and aquaculture sectors.

We hope you find this information useful. Please do not hesitate to contact us should you require anything further.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Javier Garat', written over a horizontal line.

Javier Garat ,  
President of Europêche

A handwritten signature in blue ink, appearing to read 'Pim Visser', written over a horizontal line.

Pim Visser,  
President of EAPO

CC: DG MARE