



ASSOCIATION OF NATIONAL ORGANISATIONS
OF FISHING ENTERPRISES IN THE EU

EP(18)14

Mr RAMBAUD Christian
Head of Unit
Trade Negotiations and
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Partnership Agreements
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1000 Bruxelles

15th February 2018

Re: EU autonomous tariff quotas for certain fishery products for the period 2019-2021

Dear Mr Rambaud,

In view of the preparation of the new set of autonomous quotas that will replace those established in Regulation 2015/2265, we would like to send you some important remarks which are of major concern for the European fishing industry.

As a general observation, Europêche is not opposed to a tariff free setting for certain fishery products. Nevertheless, we are experiencing a situation where EU and global fish stocks have recovered over the last decade 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. Contrary to these positives developments, EU processing and retailer companies are requesting increased ATQs for the majority of the species included in the Annex of the Regulation. The European Union should give a clear signal that it does recognise the importance of the strong promotion of our European products.

Moreover, it should be highlighted that it is in the gutting and cleaning of the fish where the greatest number of jobs is required for the EU processing industry. Therefore, it is clear that increased imports of fish filets and loins already processed to the EU will result in a loss of said jobs for these companies and a decrease in prices. As a consequence of the latter factor, ATQs with a tariff duty of zero will also force the EU catching sector to sell their product in other international markets in search for better prices.

More specifically, some organisations are pushing for the introduction of a safeguard clause to cover unforeseen situations such as major market disruptions or natural disasters so processor and retailers can sufficiently supply the EU market (up to 20% increase), particularly for tuna. As you know, this has been compensated with major increases in the annual amount of quota to be imported into the EU at a reduced tariff rate. Therefore, since the conditions to grant the safeguard clause are no longer met, this measure makes no sense and would be used to promote speculative buying.

Europêche calls DG MARE to eliminate the zero tariff quota currently allowed for 25,000 tonnes of tuna loins. Europêche would like to remind the Commission that, in practice, the only countries that are benefiting from the tariff quota of tuna loins, that is Thailand, China, Indonesia and Vietnam, are particularly criticized considering that they do not respect the same standards set by the EU on management and control of fishing activities, working conditions, health and sustainability of resources. This is even more aggravated in view of the yellow card and modern slavery practices reported in Thailand.

Europêche considers that there is sufficient tuna raw material, from the EU fleet and from countries that have duty free access to the EU, to supply the European canning industry. In fact, with the Spanish and French controlled fleet alone, around 700,000 tons of skipjack, yellow fin and big eye tuna are caught annually.

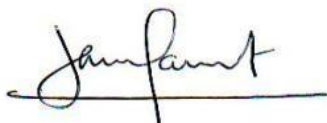
Europêche recalls that countries like Mauritius or Ecuador and, in general, the ACP countries (African, Caribbean and Pacific) and those covered by the GSP + (Generalised System of Preferences) such as the Philippines will be also seriously affected. Concerning the latter, it is quite appalling that despite the GSP+ benefits granted by the EU in December 2014, according to which Philippines enjoys zero duties on its tuna product exports to the EU, this has not been used by processors and retailers. In 2013 alone, the country's export volume reached 165,757 MT for all tuna species. Part of these could have been used by the EU processing companies as a major source of supply for their factories. Instead, the majority of the quota supply comes from China and Thailand. This demonstrates that in practice ATQs serve the sole purpose of getting a better price from cheaper producers, who have no regard for sustainable standards, and not supply the EU market.

We are of the strong opinion that the 5000 tonnes of flatfish on page two should be reduced to zero as there is plenty of flatfish quota in the EU (e.g. plaice) so no shortage in raw material occurs and therefore there is absolutely no need for extra supply to this market. Particularly, Europêche does not recommend the tariff-free imports of yellow-tail flounder, rock sole, pangasius, Alaskan pollack and tilapia which are used as substitute products for a number of sustainably fished species and are used for processing. Large volumes of cod and hake are also benefiting from various trade-related measures, despite an improvement in the state of the stocks and in fishing opportunities for 2018.

We firmly believe that the processing sector has a legitimate and important role to play in supplying sufficient quantities of seafood to EU citizens. However, we are of the opinion that, in light of the socio-economic consequences of ATQs to the EU fishing industry, this instrument must be solely used when there is no sufficient seafood supply for our markets and cannot be intended to put pressure on EU producers' prices.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Javier Garat', with a horizontal line underneath it.

Javier Garat
President of Europêche