



EP(21)23

Commissioner for Taxation and Customs Union
Mr. Paolo Gentiloni

Commissioner for Environment, Oceans and Fisheries
Mr. Virginijus Sinkevičius

European Commission
Rue de la Loi 200
1049 Brussels - Belgium

Brussels, 15 April 2021

Re.: Revision of Union tariff quotas for fishery products originating in Norway and Iceland

Dear Commissioner Gentiloni, Dear Commissioner Sinkevičius,

The current agreements on Iceland's and Norway's financial contributions to social and economic cohesion in the European Economic Area (EEA) will expire on 30 April 2021. On behalf of the EU fishing industry represented by Europêche and EAPO we are pleased to send you herewith our views on the ongoing negotiations and in particular on the linkage between market access and access to fishing grounds and resources, and on the setting of autonomous tariff quotas (ATQs) for certain fishery products originating in Norway and Iceland¹.

First, the Financial Mechanism for the EEA has traditionally separated market access from access to fish resources and fishing grounds. However, as constantly and successfully been argued by the European Union during the Brexit negotiations, trade agreements with neighbouring third countries must have a direct link with negotiations on fisheries access, and therefore cannot be disconnected. In this vein, Europêche and EAPO stress that reciprocal free access to waters, ports, business ownership, investments and services cannot be separated from the issue of free trade and access of Norwegian and Icelandic fisheries products to the EU Single Market. This is based on the principle of reciprocity in international relations and treaties.

The current situation however is that Norwegians or Icelanders can own EU-flagged vessels, but EU ship-owners are not granted the same right and yet, fish products originating from Norway and Iceland have free access to our market.

This existing imbalance has become even more damaging for the EU fishing industry since now both the outcome of the EU-UK Trade and Cooperation Agreement (TCA) and the Norwegian action on the Svalbard cod are strongly and negatively impacting the EU fleet.

It is therefore necessary to directly link market access with access to fishing grounds and to decide possible trade and tariff preferences against this linkage. The double impact of the Brexit outcome and the Covid-19 pandemic on the EU fishing industry makes it even more essential to establish this linkage.

¹ COMMISSION IMPLEMENTING REGULATION (EU) 2016/1422 of 24 August 2016 amending Council Regulation (EC) No 992/95 as regards Union tariff quotas for certain agricultural and fishery products originating in Norway
COMMISSION IMPLEMENTING REGULATION (EU) 2016/1219 of 26 July 2016 amending Council Regulation (EC) No 499/96 as regards Union tariff quotas for certain fish and fishery products originating in Iceland

In addition, and similar to what has been included in the TCA, the EEA Financial Mechanism should introduce a clause establishing remedial measures in case of withdrawal or reduction of access for EU vessels to fishing grounds and resources in Norwegian and Icelandic waters. The clause should empower the EU to suspend, in whole or in part, the preferential tariff treatment granted to seafood products from foreign countries to effectively react to changes in the level and conditions of access by EU vessels to third country waters.

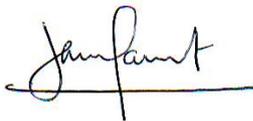
Concerning ATQs, as further described in the position paper attached to this letter, zero-duty tariffs must be solely used when it is manifest that there is insufficient seafood supply to cater EU consumers. Zero-duty tariffs should never result in putting pressure on EU producers' prices. We must maintain a level playing field between EU and non-EU producers and this level playing field should never be distorted by tariff allowances given to third countries.

It would be a mistake to allow free market access for foreign seafood suppliers without applying the principle of reciprocity and mutual benefit. The European seafood market is our most powerful weapon in achieving fair global competition and the promotion of its core principles such as sustainability and social fairness in the field of fisheries. The EU must therefore use market access as means to safeguard its own fishing interests.

Given the current political developments, the outcome of Brexit for the EU fishing sector and given the fact that current import tariff quota are underutilised, **Europêche and EAPO believe it necessary to reduce and even eliminate ATQs for certain fishery products as further analysed in the enclosed paper, in particular for mackerel, herring, cod and redfish.**

We trust that EU decision-makers will pay due attention to the EU fishing industry comments and concerns.

Yours sincerely,



Javier Garat
President of Europêche



Pim Visser
President EAPO

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Permanent Representations to the EU

DG MARE

Pierre Karleskind, European Parliament Committee on Fisheries (PECH)

Bernd Lange, European Parliament Committee on International Trade