



Commissioner Karmenu Vella,
European Commission,
Rue de la Loi 200,
1049 Brussels,
Belgium,

11th November 2015

Re. Autonomous Union Tariff Quotas (ATQs) for certain fisheries products

Dear Commissioner Vella,

In view of the upcoming discussions to be held tomorrow within the Council of the EU Working Group on ATQs for certain fisheries products for the period 2016 to 2018, we would like to send you some important remarks which are of major concern for the European fishing industry.

That latest available Council position contains a number of issues which go against the European catching sector interests and if adopted will have a severe adverse economic impact on the 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, **the Council of the EU is proposing 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.

On the other hand, please note that it is in the gutting and cleaning of the fish where the greatest number of jobs is required for the processing industry. Therefore, it is clear that increased imports of fish filets and loins to the EU will result in a loss of said jobs and a decrease in prices.

More specifically, some Member states 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). 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.

We are also highly concerned about the filets known as **'loins' of tunas and skipjack** for processing. In case the Council of the EU decides to withdraw the "semi-annual splitting" of the 22 000 tonnes, it will have a huge impact on the EU industry. It will lead to a heavy drop of the EU products' prices which will not be able to compete with 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 and sustainability of resources.

The EU fishing industry has requested since the beginning of the negotiations the elimination of the ATQ for tuna loins. If this is not possible because member States don't agree, we would be ready to accept 22.000 tonnes but only if the Council introduces annual splitting as of 2017. It is essential to include an annual splitting for this species in order to ensure that European producers are protected against speculation from processing companies.

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 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,

Javier Garat ,

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President of Europêche

Pim Visser,

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

President of EAPO

CC: DG MARE