



Polskie Stowarzyszenie Przetwórców Ryb

— Polish Association of Fish Processors —

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Members of the General Assembly of the AIPCE and CEP

Polish Association of Fish Processors would like to draw the attention of the Colleagues - European processors, members of AIPCE, to the issue of the burden of a FAP processors with numerous environmental certificates (eco-labels) designed to ensure the sustainable origin of the processed raw material and also to the fact that it is mostly processors, neither fishermen nor consumers, to carry the continuous cost of maintaining environmental certificates (eco-labels) required by retail chains.

The clearest example here is the MSC certificate, through which, as in a magnifying glass, one can see the essence of the problem faced by processors.

"MSC is to raise the consumer awareness"

Nobody disputes the need to respect the principle of sustainable fisheries.

It is obvious that every non-governmental organization that maintains this principle has the full support of these seafood processors who are aware that natural resources need to be protected and that people cannot interfere too much with natural resources.

Raising this awareness - to achieve satisfactory results, can however last for years.

This work costs, obviously.

The question should be asked - why only the processors and only sometimes the consumer have to pay for this work?

This situation brings in real consequences;

Profitability in fish processing is low; on average, within 1% -4%.

In some companies, the MSC fee (Royal fee) takes about 25% of gross profit.

One must be aware of this.

It's a very high cost.

Should not we then ask the question; if the use of funds, collected by the MSC, as part of certification fees brings a real impact on the sustainability of fishing?

In our opinion - there is only one authoritative method that gives the possibility to achieve and conduct sustainable catches - 100% control of catches landings in ports.

It is the stage when efforts and considerable resources available, for this purpose, to the European Commission, should be concentrated.

Processing is the next stage – it is just processing of a caught and landed raw material.

The processors do not fish.

They neither carry out IUU fishing.

Processing does not grant, to the processed raw material, neither status of sustainability nor even the status of legality.

Another question should be asked – aren't there too many eco-labels that are required today from processors?

Shouldn't this phenomenon be set in order by evaluating the role that environmental NGOs play and the values that individual certification organizations bring in to achieve and ensure the sustainable exploitation of natural resources of the seas and oceans?

It is possible that such evaluation will lead to the question whether there should be so many certificates and whether the particular NGO, although necessary and doing a lot of good in the process of resource protection, must issue a certificate (eco-label)?

It seems to us that this question is additionally justified by the fact that non-governmental organizations themselves raise such doubts about themselves.

The example:

Sixty-six marine conservation organizations, animal protection organizations, and leading academics recently issued a joint letter to Marine Stewardship Council (MSC) chair Werner Kiene, criticizing the MSC for its failure to improve the label's Principle 2 ("Environmental and Ecological Impacts") standards.

In the letter, the signatories condemned the MSC for awarding an increasing number of certifications to fisheries that catch thousands of vulnerable and endangered animals and irreversibly harm vulnerable ocean habitats. This practice, the letter notes, brings into question the credibility of the MSC and misleads consumers who trust the "certified sustainable" label when purchasing seafood.

The groups hope that the MSC views the letter as an opportunity to accept feedback from a wide range of well-known and respected organizations from across the globe, in order to improve MSC standards and their credibility as the leading seafood certifier in the world.

"While the letter acknowledges that the MSC responded to some stakeholder concerns, it highlights a number of major weaknesses that remain in the certification process and require urgent attention.

An annex to the letter elaborates on the critical weaknesses in the MSC system that allows fisheries accompanied by significant conservation concerns to be certified as sustainable. Case studies are included to underscore the nature and extent of the coalition's concerns. Throughout 2017, MSC also received numerous communications urging that the organization strengthen its standards and assessment process.

To view the letter visit:

<https://awionline.org/sites/default/files/uploads/documents/temp/AWI-ML-Open-Letter-to-MSC-012018.pdf>.

Source: <https://awionline.org/press-releases/organizations-call-marine-stewardship-council-msc-improve-standards>

We conclude and hope that AIPCE will undertake and initiate a discussion on a problem that directly affects all of us – the FAP processors.

Currently, several certificates are required from Polish FAP processors (including MSC).

The parameters of these certificates are generally repeated.

This year at Seafood show in Brussels, I talked to Mr Karmenu Vella, the EU Commissioner for Fisheries and Maritime Affairs, and informed him about the problem.

I have declared to the Commissioner, that the Polish industry is ready to initiate, through AIPCE, with a resolution to sort out this topic.

The Commissioner accepted such action.

Looking forward to having the discussion in Rome.

Your sincerely,

Jerzy Safader

President of Board of PAFP

