

**European Association of Fish Producers Organisations**  
**Association Européenne des Organisations de Producteurs dans le secteur de la pêche**



**EAPO / AEOP**

**H. Baelskaai 20 – 8400 OOSTENDE (Belgium)**

**tel: +32 59 43 20 05**

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**Letter by e-mail attachment to:**

Ms Idil, Head of Unit B3 Trade Negotiations ([celine.idil@ec.europa.eu](mailto:celine.idil@ec.europa.eu))

Ms De Bleeker, Policy Officer Unit B3 Trade Negotiations ([Eva.DE-BLEEKER@ec.europa.eu](mailto:Eva.DE-BLEEKER@ec.europa.eu))

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**Subject: *EU autonomous tariff quotas for certain fishery products for the period 2021-2023***

As the Commission is starting to prepare the new set of autonomous quotas to replace those established in Regulation 2018/1977, EAPO is concerned that the ATQ regulation does not reflect the full scale of tariff free fish and fisheries products imported into the EU through third countries trade agreements and the General Scheme of Preferences. We find it important that an overall picture of the free trade possibilities is assessed before decisions are taken on ATQs. Overall EAPO is of the opinion that EU producers and processors should strive together to convince EU consumers to purchase more EU fishery products.

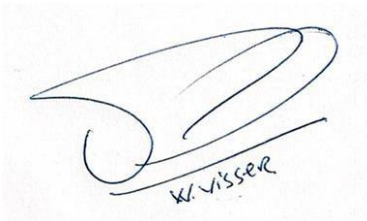
Generally, we are not opposed to a tariff free environment in principle, but this should also be based on maximising internal procurement. First, it is a topical matter of food security. The COVID19 crisis has shown the fragility of supply chains and the importance of favouring locally produced food. Second, sustainability of food products is one of the key components of the new Farm to Fork Strategy of the Green Deal, as explained in the Roadmap published on the 17th February 2020. Imports from third countries benefitting from ATQs, in addition to their transport greenhouse gas emissions, do not automatically follow as strict sustainability standards as the EU local products do. Furthermore, ATQs should also ensure that the differences between the EU fishers, operating in one of the most regulated fisheries of the planet and with top of the class socioeconomics and environmental standards, and third countries fisheries are considered. This last point is crucial to ensure a true level playing field and fair competition.

Therefore, there should be EU production preference, using the TAC and quota system as a reference to analyse the potential need for ATQs. We are convinced that the profitability of the EU fisheries sector and the well-being of many EU coastal communities can be substantially improved if this would be taken into account when deciding on free trade volumes.

EAPO finds that no products should be added to the new regulation compared with the current one and an overall decrease is required for the current products. EAPO recommends that for the period 2021-2023, reductions should be applied for products quotas when ATQs of the previous years have been underutilised. After several requests to the Commission to obtain utilisation information we have received data for 2019. Based on this and earlier experiences we recommend amending the ATQs that are not fully used, as shown in the table below. Also, further reductions should be applied when the imported products risk harming EU producers marketing opportunities (either because they are similar products or products used as alternatives). A decrease of ATQs is likewise recommended where EU TAC have increased, and stocks are in a particularly good state.

Please find in Annex 1 product specific remarks, and ATQs suggestions based on the available data (2015- 2017, 2019).

Yours sincerely,

A handwritten signature in blue ink, consisting of a stylized, cursive 'P' followed by the name 'PIM VISSER' written in a smaller, more legible font.

Pim Visser,

President

**Annex 1: EAPO input suggestion on ATQ in relation with the annual amount for the period 2019-2020.**

Order No	CN code	TARIC code	Description	Annual amount of quota (tonnes) (1)	Quota duty	Quota period	EAPO input	
							Quota recommendation for period 2021-2023	Reasoning / comments
92.746	ex 0302 89 90	30	Southern red snapper ( <i>Lutjanus purpureus</i> ), fresh, chilled, for processing	1 500	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (less than 60% of ATQs used in 2019)
92.748	ex 0302 91 00	95	Hard fish roes enclosed in the ovarian membrane, fresh, chilled or frozen, salted or in brine, for processing	5 700	0%	1.1.2019-31.12.2020	3000 tonnes	Underutilisation (less than 50% of ATQs used in 2015, 2016, 2017; less than 65% in 2019)
	ex 0303 91 90	91						
	ex 0305 20 00	30						
92.750	ex 0305 20 00	35	Hard fish roes, washed, cleaned of adherent organs and simply salted or in brine, for the manufacture of caviar substitutes	1 500	0%	1.1.2019-31.12.2020 (* 1.1.2019-31.12.2020)	1000 tonnes	Underutilisation (less than 50% of ATQs used in 2015, 2016, 2017 and decreasing to 36% in 2019)
	ex 1604 32 00*	20						
92.754	ex 0303 59 10	10	Anchovies ( <i>Engraulis anchoita</i> and <i>Engraulis capensis</i> ), frozen, for processing	500	0%	1.1.2019-31.12.2020	0 tonnes	Underutilisation (0% of ATQs used in 2016, 2017, 2019)
92.759	ex 0302 51 10	20	Cod ( <i>Gadus morhua</i> , <i>Gadus ogac</i> , <i>Gadus macrocephalus</i> ) and fish of the species <i>Boreogadus saida</i> , excluding livers and roes, fresh, chilled or frozen, for processing	95 000	0%	1.1.2019-31.12.2020		
	ex 0302 51 90	10						
	ex 0302 59 10	10						
	ex 0303 63 10	10						
	ex 0303 63 30	10						
	ex 0303 63 90	10						
ex 0303 69 10	10							
92.760	ex 0303 66 11	10	Hake ( <i>Merluccius</i> spp. excluding <i>Merluccius merluccius</i> , <i>Urophycis</i> spp.), and pink cusk-eel ( <i>Genypterus blacodes</i> and <i>Genypterus capensis</i> ), frozen, for processing	12 000	0%	1.1.2019-31.12.2020	5000 tonnes	Underutilisation of ATQs (less than 20% in 2017, and 32% in 2019) and because marketing opportunities for EU producers should not be hampered by alternatives such as this one.
	ex 0303 66 12	10						
	ex 0303 66 13	10						
	ex 0303 66 19	11						
		91						
	ex 0303 89 70	10						
ex 0303 89 90	30							

92.761	ex 0304 79 50	10	Blue grenadier ( <i>Macruronus</i> spp.), frozen fillets and other frozen meat, for processing	17 500	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (only 52% used in 2019)
	ex 0304 79 90	11						
		17						
	ex 0304 95 90	11						
		17						
92.765	ex 0305 62 00	20	Cod ( <i>Gadus morhua</i> , <i>Gadus ogac</i> , <i>Gadus macrocephalus</i> ) and fish of the species <i>Boreogadus saida</i> , salted or in brine, but not dried or smoked, for processing	3 500	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (only 56% used in 2019)
		25						
		29						
	ex 0305 69 10	10						
92.770	ex 0305 63 00	10	Anchovies ( <i>Engraulis anchoita</i> ), salted or in brine, but not dried or smoked, for processing	2 500	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (less than 55% of ATQs used in 2015, 2016, 2017; decreasing to 40% in 2019)
92.772	ex 0304 93 10	10	Surimi, frozen, for processing	60 000	0%	1.1.2019-31.12.2020	44 000 tonnes	Underutilisation (85% of ATQs used in 2015, 2016, and less than 70% in 2017)
	ex 0304 94 10	10						
	ex 0304 95 10	10						
	ex 0304 99 10	10						
92.774	ex 0304 74 15	10	North Pacific hake ( <i>Merluccius productus</i> ) and Argentine hake (Southwest Atlantic hake) ( <i>Merluccius hubbsi</i> ), frozen fillets and other meat, for processing	25 000	0%	1.1.2019-31.12.2020		
	ex 0304 74 19	10						
	ex 0304 95 50	10						
		20						
92.776	ex 0304 71 10	10	Cod ( <i>Gadus morhua</i> , <i>Gadus macrocephalus</i> ), frozen fillets and frozen meat, for processing	50 000	0%	1.1.2019-31.12.2020		
	ex 0304 71 90	10						
	ex 0304 95 21	10						
	ex 0304 95 25	10						
92.777	ex 0303 67 00	10	Alaska pollack ( <i>Theragra chalcogramma</i> ), frozen, frozen fillets and other frozen meat, for processing	320 000	0%	1.1.2019-31.12.2020	250 000 tonnes	Underutilisation (less than 85% in 2017) and because used as substitute for EU products.
	ex 0304 75 00	10						
	ex 0304 94 90	10						

92.778	ex 0304 83 90	21	Flatfish, frozen fillets and other fish meat ( <i>Limanda aspera</i> , <i>Lepidopsetta bilineata</i> , <i>Pleuronectes quadrituberculatus</i> , <i>Limanda ferruginea</i> , <i>Lepidopsetta polyxystra</i> ), for processing	10 000	0%	1.1.2019-31.12.2020	0 tonnes	No shortage of raw EU material. Plaice, stock in the North Sea is categorized to be in a very good state. TAC increases are restricted to take into account the risk of overproduction. Tariff free imports of substitute products for this and other flatfish species are therefore counterproductive to the EU objectives.
	ex 0304 99 99	65						
92.785	ex 0307 43 91	10	Pod (2) of squid ( <i>Ommastrephes</i> spp. - excluding <i>Todarodes sagittatus</i> (synonym <i>Ommastrephes sagittatus</i> ) - , <i>Nototodarus</i> spp., <i>Sepioteuthis</i> spp.) and <i>Illex</i> spp., frozen, with skin and fins, for processing	28 000	0%	1.1.2019-31.12.2020	10 000 tonnes	Underutilisation (less than 60% of ATQs used in 2015, 2016, 2017, decreasing to 44% in 2019)
	ex 0307 43 92	10						
	ex 0307 43 99	21						
92.786	ex 0307 43 91	20	Squid ( <i>Ommastrephes</i> spp. - excluding <i>Todarodes sagittatus</i> (synonym <i>Ommastrephes sagittatus</i> ) - , <i>Nototodarus</i> spp., <i>Sepioteuthis</i> spp.) and <i>Illex</i> spp., frozen, whole or tentacles and fins, for processing	5 000	0%	1.1.2019-31.12.2020		
	ex 0307 43 92	20						
	ex 0307 43 99	29						
92.788	ex 0302 41 00	10	Herrings ( <i>Clupea harengus</i> , <i>Clupea pallasii</i> ), of a weight exceeding 100 g per piece or flaps of a weight exceeding 80 g per piece, excluding livers and roes, for processing	8 000	0%	1.10.2019-31.12.2019 1.10.2020-31.12.2020	Reduce ATQs	Underutilisation (<60% of ATQs used in 2015, 2016, 2017), and imports already occurring under other agreements
	ex 0303 51 00	10						
	ex 0304 59 50	10						
	ex 0304 99 23	10						
92.790	ex 1604 14 26	10	Fillets known as 'loins' of tunas and skipjack, for processing	30 000	0%	1.1.2019-31.12.2020	0 tonnes	This benefits to countries such as Thailand, China, Indonesia and Vietnam, criticised for their level of standards regarding sustainability of the resource. There is no shortage of such products caught by the EU fleet and therefore no reason to import 20% of tuna loins through such scheme. Moreover, such imports translate in job losses in the canning industry (cleaning and gutting).
	ex 1604 14 36	10						
	ex 1604 14 46	11						
		21						
		92						
	94							

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92.794	ex 1605 21 90	45	Shrimps and prawns of the species <i>Pandalus borealis</i> , and <i>Pandalus montagui</i> , cooked and peeled, for processing	7 000	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (51% used in 2019)
		62						
		50						
	ex 1605 29 00	55						
92.798	ex 0306 16 99	20	Shrimps and prawns of the species <i>Pandalus borealis</i> and <i>Pandalus montagui</i> , in shells, fresh, chilled or frozen, for processing	4 000	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (16% used in 2019)
		30						
	ex 0306 35 90	12						
		14						
		92						
		93						
92.800	ex 1605 21 90	55	Shrimps and prawns of the species <i>Pandalus jordani</i> , cooked and peeled, for processing	3 000	0%	1.1.2019-31.12.2020	2000 tonnes	Underutilisation (51% used in 2019)
	ex 1605 29 00	60						
92.802	ex 0306 17 92	20	Shrimps and prawns of the species <i>Penaeus vannamei</i> and <i>Penaeus monodon</i> , whether in shell or not, fresh, chilled or frozen, not cooked, for processing	40 000	0%	1.1.2019-31.12.2020		
	ex 0306 36 90	30						
92.824	ex 0302 52 00	10	Haddock ( <i>Melanogrammus aeglefinus</i> ) fresh, chilled or frozen with heads off, gilled and gutted, for processing	3 500	2,60%	1.1.2019-31.12.2020	0 tonnes	Underutilisation (<55% of ATQs used in 2016, 2017)
	ex 0303 64 00	10						
92.826	ex 0306 17 99	10	Shrimps and prawns of the species <i>Pleoticus muelleri</i> , whether in shell or not, fresh, chilled or frozen, for processing	4 000	0%	1.1.2019-31.12.2020	0 tonnes	Underutilisation (<25% of ATQs used in 2016, 2017),
	ex 0306 36 90	20						
92.804	ex 1605 40 00	40	Crayfish tails of the species <i>Procambarus clarkii</i> , cooked, for processing	4 000	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (32% used in 2019)
92.762	ex 0306 11 10	10	Rock lobster and other sea crawfish ( <i>Palinurus</i> spp., <i>Panulirus</i> spp., <i>Jasus</i> spp.), live, chilled, frozen, for processing	200	6%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (31% used in 2019)
	ex 0306 11 90	20						
	ex 0306 31 00	10						
09.2784 (3)	ex 1605 10 00	21	Crabs of the species 'King' ( <i>Paralithodes Camchaticus</i> ), 'Hansaki' ( <i>Paralithodes brevipes</i> ), 'Kegani' ( <i>Erimacrus isenbecki</i> ), 'Queen' and 'Snow' ( <i>Chionoecetes</i> spp.), 'Red' ( <i>Geryon quinque-dens</i> ), 'Rough stone' ( <i>Neolithodes</i>	500	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (0% used in 2019)
	95							

92.822	ex 0303 11 00	20	Pacific Salmon, headed and gutted, frozen, of the species <i>Oncorhynchus nerka</i> (sockeye salmon (red salmon)) and <i>Oncorhynchus kisutch</i> , for processing	10 000	0%	1.1.2019-31.12.2020	Reduce ATQs because underutilisation	Underutilisation (13% used in 2019)
	ex 0303 12 00	20						