

1. Flexibility in creation of first lot

Background

There is an imbalance between businesses in their ability to digitalize their processes. Small and micro businesses, for example single person inland fisheries, may not have the capacities to start the process of digitalization on their own. Cost of investment becomes an existential threat to the business.

Solutions

- To not unnecessarily burden smaller businesses there should be flexibility in the creation of first lot.
- Businesses should be able to delegate first lot definition to third party/partner in the supply chain.
- Increasing flexibility and the possibility of delegating the first lot formation to downstream actors (e.g. gatekeeper approach) would reduce the administrative burden and reduce the burden on small companies,
- The Gatekeeper approach allows a downstream partner in the supply chain to assume the role and responsibility in respect to lot definition for his suppliers.



2. Responsibility of EU-importers

Background

EU-importers of FAPs are in no position to request from their non-EU suppliers the definition of first lot information for the export to EU. Requesting such information in addition to internationally recognized standard documents (e.g. in relation to trade, transportation, food safety, IUU) does place a significant competitive disadvantage on EU-importers.

Solutions

- The FCR needs to strengthen the role of EU-importers and enable them to act as gatekeeper for non-EU imports.
- The formation of gatekeeper lots for import need to make use of existing frameworks, esp. IUU.
- First EU business issuing the product on the EU market shall be responsible for the provision of accurate transcription of catch certificate information into the gatekeeper lot. The responsibility for the accuracy of the Catch Certificate information shall remain with governmental authorities.
- In case of FAPs not falling under IUU-regulation, a comparable framework for gatekeeper lot formation in relation to Health Certificates and transportation papers can be implemented.
- An impact assessment should be made on EU competitiveness.



3. Pool-lots

Background

There are fisheries with multi vessel catches or multi species catches as well as aquaculture businesses with multiple production units where it is not technically feasible to separate these before or during the creation of first lot.

Solutions

- Formation of pool-lots must be allowed and needs to be defined by a guideline (or delegated act). These lots must be allowed to include pooled Article 58.5 information. Especially vessels, weights, fishing gear and species must be eligible for pooled lots.
- Pooled lots could be broken down into categories such as multi-species lot with more than one FAO-species code or multi vessel lots with more than one IMO number/vessel id.
- In case of FAPs falling under the framework of IUU regulation 1005/2008, the Catch Certificate and information requested therein shall be the basis for all lot information.



4. Internal traceability in processing

Background

There are many different preparation and processing steps involved in the production of both CN chapter 03 products and CN chapter 1604 and 1605 products. Implementation must be compatible with existing production practices/established processing routines.

Solutions

- When a product is processed it may go through various processing, storage and transportation steps within the same company. During these steps, FBOs have existing systems in place to track the material flows within the company. It should therefore not be mandatory to form new FCR-lots of intermediary products during processing.
- Instead, the relevant control points for the formation of FCR-lots shall be “entrance of lots into the company” and “departure of product from the company”. Such a production lot will involve all relevant information (Art. 58.5) and will enable the traceability from “entrance” over to “departure”.



5. Freedom of methodology

Background

Freedom of choice in every step and for every FBO on the actual technical tools to form lots, to store lot information, to label lots, to share it with supply chain partners/customers, to provide information to control authorities.

Solutions

- There needs to be a general freedom of methodology when it comes to the technical tools used throughout the supply chain.
- Any FBO at any stage of the supply chain shall have the right to relabel a lot, in order to introduce their own lot identification number system and to increase the compatibility with their own warehouse system.

