

# Workshop on Producer Organisations under the Common Market Organisation in Fishery and Aquaculture Products

## Report

Tuesday, 28 January 2025 (10:30 – 17:00 CET)

Copa Cogeca, Rue de Trèves 61, 1040 Brussels

### I – Welcome

- **Yobana Bermúdez, Chair, MAC**

Yobana Bermúdez (MAC), on behalf of the Market Advisory Council (MAC) and of the South Western Waters Advisory Council (SWWAC), thanked the participants for joining the workshop. Ms Bermúdez recalled that, under the Common Market Organisation (CMO) Regulation, groupings of fishers and aquaculture farmers can be formally recognised as Producer Organisations, which are expected to play a key role in the day-to-day implementation of the Common Fisheries Policy (CFP). In the pursuit of their objectives, Producer Organisations (POs) must prepare Production and Marketing Plans (PMPs), which can be funded by the European Maritime, Fisheries and Aquaculture Fund (EMFAF).

Ms Bermúdez highlighted that, through the workshop, the aim was to bring together members of the Advisory Councils, representative of the EU institutions and of national administrations, and external experts to exchange on the functioning and funding of POs. She expressed hope that the issues raised in a 2023 report of the European Commission on the CMO Regulation would be addressed, such as the different treatment by national administrations, the need to improve support for Transnational Producer Organisations (TPOs) and for Interbranch Organisations (IBOs), the limited number of aquaculture POs, and the specificities of small-scale fishers.

Ms Bermúdez emphasised that the moment of the workshop had particular relevance, as the European Commission was undertaking an evaluation of the CFP, which would include the provisions of the CMO. She recalled that, in the context of that work, DG MARE commissioned an external study with a particular focus on POs.



Ms Bermúdez informed that, as an outcome of the workshop, the MAC and the SWWAC would develop advice to the European Commission and to the Member States on the functioning of POs as well as on the implementation of the PMPs, including issues such as funding, level-playing-field across the EU, and adaptation to the challenges faced by the fisheries and aquaculture sector.

## II – Keynote speech

- **Sven Langedijk, Head of Unit, MARE A4 (Economic Analysis, Markets and Impact Assessment), European Commission**

Sven Langedijk (DG MARE) thanked the MAC and the SWWAC for the organisation of the workshop. Mr Langedijk expressed satisfaction that, while POs represented the bulk of the professional organisations within the meaning of the CMO Regulation, Associations of Producer Organisations (APOs) as well as Inter-Branch Organisations (IBOs) would be covered. He emphasised that, under the CMO, professional organisations are fundamental pillars for the development and stability of the fishery and aquaculture markets in the EU.

Mr Langedijk stated that each of the three types of professional organisations represented contribute uniquely to the functioning and sustainability of the supply chain and the sector. POs and APOs focus on combining efforts of producers, to enhance product marketability, aim to ensuring fair competition, and improving the profitability of their members. IBOs play vital roles in standardisation across sectors and facilitating dialogue across the supply chain. He emphasised that their collective efforts ensure the effective implementation of the CMO and the CFP allow the markets of fishery and aquaculture products to function in the context of significant challenges. Additionally, they also promote sustainable practices.

Mr Langedijk, on consumer habits in the market, highlighted that, over the past years, some changing consumer habits and unforeseen developments on the market were observed. He exemplified that inflation had impacted the purchasing power of EU consumers, consumer prices for fresh seafood products rose by 3.4% in 2023, which followed very large price increases in 2022 (10.1%), and this has apparently been an important factor in decreasing consumption in volume.



Mr Langedijk, supply disruptions and continuity, highlighted that recent events, like the COVID-19 pandemic or the Russian war of aggression against Ukraine, unexpectedly impacted supply and demand and questioned the EU's strategic autonomy. These required a rapid response from policymakers as well as adaptability and reactivity from stakeholders. He mentioned that the availability of supply and also fishing opportunities fluctuate over time, with regional disparities across the EU. Mitigation measures, such as the closure of the Bay of Biscay, prevent some fishers to go at sea for several week. While these measures are necessary, they impact activities, revenues and the market for several weeks.

Mr Langedijk emphasised that, in the described context, to avoid temporary or even permanent cessation of activities at the production and the wholesale level, the role of POs is essential to mitigate disturbances on the market. The POs instruments, including the system of swaps between POs, are crucial in ensuring a fair and efficient distribution of resources among members. This collective approach enabled a level of management and flexibility that individual producers cannot achieve on their own. He added that, in the realm of aquaculture, POs play an indispensable role, significantly boosting the producers bargaining power, which is particularly vital in the current competitive landscape, as the industry faces the dual challenges of price pressure from cheaper imported products and escalating production costs.

Mr Langedijk stated that the diversity within many POs is a key strength. By including both small and large-scale producers, POs create complementarities within fishing fleets and aquaculture farms. The mentioned diversity is crucial for resilience. He highlighted that, when faced with challenges, different parts of the industry are affected in various ways. Therefore, a diverse producer can help weather these storms, whether in fishing or aquaculture.

Mr Langedijk, on the democratic functioning of POs, argued that, for a collective body to function well, all voices must be heard and represented. This is why the key principles of representativeness, democratic functioning, and plurality, as outlined in the CMO regulations, need to be enforced and verified. He added that the workshop provided an excellent opportunity to delve deeper into these dynamics and strengthen the support for professional organisations in the sector.



Mr Langedijk recalled that, in 2017, the MAC organised a similar workshop, which provided a platform for participants to share their experiences in implementing market tools from the reformed CMO Regulation, with a focus on PMPs. He highlighted that the discussions were productive, leading to the creation of comprehensive guidelines. He further recalled that these guidelines, still available on the MAC's website, have been updated to incorporate changes from the EMFAF and remain largely relevant.

Mr Langedijk, on PMPs, highlighted that the reform of the CMO Regulation introduced these as a new tool. This new tool initially caused some challenges. The challenges were exacerbated by the delayed adoption of the EMFF, which created legal uncertainties about eligible expenditures. PMPs reversed the usual approach to EU financial support. Instead of eligibility based on the nature of expenditures, it is now based on their destinations. This gives POs the flexibility to identify the most appropriate measures to achieve their objectives, potentially allowing a wide range of actions to benefit from EMFAF support. However, this flexibility led to some hesitation among national authorities regarding the eligibility of planned measures. DG MARE's consistent message has been that "if a measure is necessary for achieving a PO's objectives, it can be included in a PMP and potentially qualify for EMFAF support".

Mr Langedijk added that, despite initial challenges, POs and national administrations adapted quickly to the new tool. The report on the implementation of the CMO Regulations confirmed that stakeholders generally view the PMP and PO system as very effective in implementing CMC and CFP objectives. The effectiveness of PMPs is further evidenced in the EMFAF national programmes. Although support for PMPs is no longer mandatory under the EMFAF, all Member States with existing POs committed to continue supporting their professional bodies. Moreover, some other Member States expressed their intention to support the creation of such organisations. He added this shows the perceived value of POs and PMPs in the sector.

Mr Langedijk recognised that, while the CMO framework for professional organisations had been largely successful, it was not without challenges. The implementation report highlighted some areas for improvement, particularly in establishing POs among small-scale producers as well as APOs and IBOs. The Commission also noted issues with PO recognition and how Member States apply and verify



the necessary criteria. He explained that DG MARE was addressing these concerns as part of the ongoing evaluation of the CFP Regulation, which includes the CMO Regulation provisions. In the evaluation, the focus would be on the CMO measures related to professional organisations and consumer information. To support this, an external study was commissioned, and professional organisations should have been contacted by the contractors. The goal was to identify effective measures and areas that may need adjustment in the Regulation. More insights would be expected by the end of 2025.

Mr Langedijk emphasised that the workshop was an opportunity to discuss POs and their associations and IBOs. The CMO system for professional organisation was designed to be implemented at the Member State level. Due to this structure, DG MARE has a limited view on the operations of professional organisations, particularly regarding PMP implementation. He highlighted the value of such an opportunity to engage with the sector. He encouraged the participants to hold a productive discussion. He expressed availability from himself and his colleagues to answer questions and provide guidance, as well to provide any further clarifications.

### **III - Panel & Presentations on Functioning of Professional Organisations across the EU (Moderator: Raúl García, Vice-Chair, SWWAC)**

- **Fabijan Hrvatin Peronja, Project Manager, Producer Organisation Friška Riba**

#### [Presentation](#)

Fabijan Hrvatin Peronja (Friška Riba) explained that his organisation was composed of 23 members combining small-scale and large-scale fleet operators. The goal of the organisation was to align fishery practices with sustainability, market demands, and resilience against industry challenges by 1) enhancing the quality and market traceability of fishery products while maintaining sustainability, 2) ensuring the sustainable management of fisheries activities and their impacts (elimination of IUU fishing and minimisation of bycatch), 3) equipping members with knowledge to understand and predict market conditions for better product positioning, 4) encouraging fishers' participation in technical and scientific initiatives to foster expertise exchange, and 5) addressing challenges like natural variability, perishability of fish, and market imbalanced by preparing for potential crises.





In terms of geographical scope, Friška Riba is located in the fishing port of Brižine. The organisation supports fishing vessels in the region by maintaining port cleanliness, providing logistical services (electricity, water, ice, storage) and managing berthing during fish unloading, despite mooring being under the jurisdiction of the port authority. As for rules of engagement, Friška Riba follows the “one member, one vote” system. No special rules for the relationship between small-scale and large-scale operators were created. Every member has the same rights and responsibilities and adheres to the statutes.

Mr Peronja drew attention to potential bottlenecks to the participation of small-scale fishers in POs. First, many small-scale fishers are unaware of the benefits of joining POs and how such organisations operate. Misconceptions about POs being bureaucratic or exclusive deter participation. Second, many small-scale fishers value their independence and may perceive POs as restrictive. Historical mistrust of cooperatives or government-related initiatives can prevent fishers from joining. Third, small-scale fishers may not see an immediate return on investment, making the cost seem unjustifiable. There is little workforce on the market willing to take on the challenge of managing such an organisation. Fourth, the small-scale fishing sector is often highly fragmented, making it challenging to mobilise fishers to form or join collective organisations. Fifth, for some, the criteria seem to be too strict, even though, in his opinion, that is the appropriate way.

Mr Peronja highlighted the various benefits of taking part in a PO, including access to financial support and incentives, representation and advocacy, improved infrastructure and logistics, market access and stability, and knowledge and skills development. As recommendations, he called for an increase in the awareness campaigns for fishers and managers, and for tailored trainings for managers as well as support for small-scale fleet operators.

- **Yannis Pelekanakis, EU Affairs Manager, Hellenic Aquaculture Producers Organisation (HAPO)**

### [Presentation](#)

Yannis Pelekanakis (HAPO) explained that his organisation was a non-profit organisation established in 2016 by 21 members. HAPO was recognised as a PO in 2018. The membership increased to 22



producers of Mediterranean species, representing 80% of the national production (100.000 tonnes). The main objective was to ensure sustainable development and competitiveness. The PMP of HAPO covers 63 different collective actions and measures. The funding originates from the membership and levy. For the period from 2018 to 2024, the budget was of € 9,6 million, of which 63% came from the EMFF. Mr Pelekanakis mentioned that the PMP covered communication and public relations campaigns, corporate social responsibility, promotion of sustainable aquaculture activities, such as the improvement of fish health and welfare, environmental performance, among others, and the improvement to the governance.

Mr Pelekanakis outlined the structure of the organisation, which secures the includes a Board of Directors, a communication manager, a scientific advisor, an EU affairs manager, a legal advisor, a secretariat, an accountant, and focus groups. In terms of the functioning, he explained that the organisation follows a democratic decision-making process, including through equitable representation in decision-making, clearly defined roles and responsibilities, frequent meetings to involve all members, tools to share information on budgets and decisions, a code of conduct outlining acceptable behaviour, ethical standards, anti-corruption policies, and a flexible funding mechanism to financially support the implementation of the PMP actions.

Mr Pelekanakis drew attention to the challenges faced from inception to the implementation of the PO. In the setting-up, it was necessary to build trust, including by educating about the benefits of the PO, and to safeguard entrepreneurial independence. In the recognition, it was necessary to face legal uncertainties on the lack of a concrete national law for POs/CMO as well as restrictions regarding the legal personality. He explained that under the national law, OPs were obliged to place in the market the production of their members, however, HAPO was set-up as a non-profit organisation - that was the most critical issue for the recognition of the PO. In the financing, there were financial uncertainties due to the eligibility period and the advance payment by members, which required a bid bond to secure debt.

- **Juana Parada, Managing Director, OR.PA.GU**

[Presentation](#)



Juana Parada (OR.PA.GU) explained that her organisation was composed of longliners was based in A Guarda, Spain, close to the natural border between Spain and Portugal. ORPAGU was founded in 1996 as a national PO and was recognised a TPO in 2017. In Spain, ORPAGU represents the largest group of surface longline vessels. It is composed of 78 fishing vessels, 47 Spanish and 31 Portuguese. Ms Parada drew attention to the challenges faced by TPOs, including the lack of differentiation from national POs, the difference in treatment between the Member States, the need for joint management and optimisation of fishing opportunities, and the national PMPs.

- **Marine Levadoux, Director, Comité Interprofessionnel des Produits de l'Aquaculture (CIPA)**

#### Presentation

Marine Levadoux (CIPA) explained that her organisation was composed of five feed manufacturers, 341 fish farmers, and 61 trout processors. CIPA represents the interests of the entire French fish farming sector, promotes French fish farming products and sustainable practices, including via quality schemes, provides education information to industry professionals and consumers, contributes to the development and implementation of aquaculture regulations, and supports research and innovation within the sector. In terms of financing, there are compulsory and voluntary financial contributions from the members. Ms Levadoux mentioned that IBOs are more common in the agricultural sector than in the sector of fishery and aquaculture products.

Ms Levadoux highlighted as key issues, concerning the possibility of extension of rules, the uncertainty in the criteria and transfer of responsibility to the Member States, including due to the mix of agricultural rules and rules of the CMO for fishery products. On labelling of origin, there were doubts on how to achieve more detailed rules from the CMO Regulation. On POs, there were no detailed rules for freshwater producers at the French level. She underscored that several key issues for fish farming, such as licensing, and an ambitious fish health strategy, were not taken into account within the CMO and the CFP. She added that, while interbranch organisations were well recognised in France, more promotion was needed through EU rules and initiatives.

- **Esben Sverdrup-Jensen, President, European Association of Fish Producers Organisations (EAPO)**





## [Presentation](#)

Esben Sverdrup-Jensen (EAPO) explained that his organisation was founded in 1980 and was composed of 30 POs from 12 EU Member States, even though it was not legally recognised as a Transnational Association of Producer Organisations (TAPO). Mr Sverdrup-Jensen further explained that the aims of EAPO were to promote sustainable fishing practices, manage fishing quotas in the Northeast Atlantic, stabilise the markets and improve economic returns, provide advice to the member son the management of their PMPs, achieve the objectives of the CFP, and achieve the objectives of the CMO for fishery products.

Mr Sverdrup-Jensen emphasised, as key issues, that, even though the reform of the CFP highlighted the role of POs and APOs, there was a lack of legal framework and difficulties in the implementation. Even though the EMFAF was an appropriate funding mechanism that recognised the role of POs, funding opportunities were a challenge for TAPOs. In the case of EAPO, funding came from individual Member States, which made the implementation of joint actions very challenging.

Raúl García (SWWAC) encouraged the panellists to outline challenges faced due to the legal framework and the implementation. He exemplified that, in Spain, the implementation depended on the autonomous communities, which lead to differences in regional implementation and potential lack of coherence among fishers. Mr García asked Mr Peronja to provide further details on the collaboration between large-scale and small-scale operators, including potential improvements on the governance, such as on transparency, reporting, and decision-making.

Fabijan Hrvatin Peronja (Friška Riba) responded that the relationship between the large-scale and the small-scale operators was positive. Mr Peronja emphasised that it was important to address the lack of trust among fishers as well as their distrust of the national authorities. Fishers were also scared of the potential administrative burden. In Croatia, there was one PO exclusively composed of small-scale operators. He expressed disappointment that the small-scale sector was not joining forces, even though it represented the majority of the sector in Croatia.

Mr Peronja called for increased awareness raining among small-scale fleet operators about POs, as even convincing fishers to participate in workshops can be challenging. In the case of his organisation,



the rule followed was “one member, one vote”. The small-scale members were, for example, on the implementation of the fisheries monitoring system. In Croatia, the small-scale fleet is allowed to operate in Marine Protected Areas, while the large-scale fleet is not, which meant that only the smaller operators welcomed these areas. Nevertheless, in Friška Riba, good relations were established between the members from the small-scale and the large-scale fleets.

- **Exchange with the moderator**

Raúl García (SWWAC) asked Mr Pelekanakis to expand on the reasoning for the limited number of aquaculture POs, including potential recommendations to increase the attractiveness of POs. He also asked Mr Pelekanakis about the governance of his association as well as to provide one example of positive change undertaken by the Greek authorities.

Yannis Pelekanakis (HAPO) emphasised that the establishment of a PO was challenging and time consuming, requiring financial and human resources. In his view, it was particularly challenging for small-scale producers. Therefore, workshops were needed to explain the benefits of POs. In the case of HAPO, there were no issues between small and large farmers, as there were common issues to address, such as the sustainability of feed, the acceptability of the sector, and climate change. He added that it was important to have a common vision on aquaculture.

Concerning the collaboration with national and local authorities, Mr Pelekanakis explained that it took two years to convince the national authorities that HAPO would not be selling the production. It was necessary to safeguard the independence of each producer and to avoid the dominance by large companies. He drew attention to the importance of taking the time to develop the statutes of the PO, including via case studies from different countries.

Raúl García (SWWAC) asked Ms Parada about the specific challenges faced by TPOs, including on how to improve the legal framework and the implementation. He also asked about the relationship with the Spanish authorities.

Juana Parada (OR.PA.GU) responded that, in terms of internal governance, at the beginning, there were many exchanges among the members to address their concerns. Ms Parada highlighted the



importance, in her role as Managing Director, of accompanying the work of the individual producers. Her organisation established a common fund for fishing opportunities, which helped the members face the delays in the setting of fishing opportunities. She called for more autonomy from the individual Member States.

Raúl García (SWWAC) asked Ms Levadoux about the challenges to set-up and receive recognition as an IBO. He encouraged her to share suggestions on how to improve the legislation and the implementation as well as to share good practices followed by the French administration.

Marine Levadoux (CIPA) highlighted that France adopted rules to recognise the production by IBOs as well as on the distribution of quotas. In her organisation, the approach followed was “one person, one vote”. The producers were represented via workers unions. Ms Levadoux provided the example of the closures of the HORECA sector during the COVID-19 pandemic, which showed the importance of communication campaigns to face crises.

Raúl García (SWWAC) asked Mr Sverdrup-Jensen for more details on the necessary changes to the legal framework to establish TAPOs. He encouraged Mr Sverdrup-Jensen to share examples from the internal functioning of his organisation, plus to expand on the relationship with the European Commission.

Esben Sverdrup-Jensen (EAPO) explained that his organisation recently adopted new rules of procedure. EAPO followed the system of “one member, one vote”. Mr Sverdrup-Jensen drew attention to the challenges in representing POs across the EU, such as the risk of the representatives being detached from the operators. Therefore, the representatives should make efforts to maintain a close relationship with the national and regional POs. He mentioned that there were challenges related to the small Secretariat, which meant that the organisation greatly depended on the individual willingness of each member. He highlighted the value of EAPO for the adoption of point advice. He called for, under the next revision of the CFP, for a higher level of ambition for TAPOs. He exemplified that EAPO would like to access funding for EU-wide campaigns.

- **Exchange with the audience**



Anna Pyć (Polish Trout Breeders Organisation) requested more information about the procedures taken by TPOs to access EU funding in different Member States. Ms Pyć shared that her organisation had to apply for funding every year. In 2024, her organisation submitted its application to the Polish authorities in January, but the analysis took place in December, so the funding was only available for the last two weeks of the year.

Esben Sverdrup-Jensen (EAPO) recognised that there was a different implementation of the PMPs across the various Member States. Some Member States were quite generous with their national funding and quite swift with the procedures, while other required more time. Mr Sverdrup-Jensen explained that the PMPs included a section dedicated to international work. He agreed that it was difficult for POs when funding is not available in the beginning of the year. He added that EAPO worked on the topic.

Jarek Zieliński (Baltic Sea Advisory Council) explained that, in the Baltic Sea Advisory Council, there was an internal discussion about POs. In the Baltic Sea, there was a collapse of POs, since the fisheries of the major species, such as cod and salmon, were closed. In the recent years, there was a very significant reduction of the pelagic fisheries. Mr Zieliński argued that the financing of POs should not be related to the landings and fishing opportunities. Otherwise, the POs in the Baltic Sea would not be able to survive. He called for an individual approach to each fishery, while especially taking into account small-scale fisheries.

Ola Öberg (Recirkfisk PO) asked Mr Peronja for more information on the difficulties to convince small-scale fishers to participate in workshops. Mr Öberg also wondered about the challenges faced by EAPO to maintain contact with their members. He added that he recognised the challenges from his own organisation, so he wanted to hear good examples on how to involve producers.

Fabijan Hrvatin Peronja (Friška Riba) recognised that there was no special solution and that it was difficult to maintain the attention of operators. Producers are not used to the work required by POs, as they are more accustomed to practical work and short-term timelines. Additionally, there could be mistrust among fishers operating in the same area.



Raúl García (SWWAC) argued that it was very dependent on the cohesion and the leadership of the organisations.

#### **IV - Breakout session on how to improve the functioning of Producer Organisations**

*The participants were divided into small groups to prepare recommendations on the functioning of POs. There was a focus on the setting and recognition of the various types of associations (POs, IBOs, TAPOs), representation of small-scale fishers, uptake by aquaculture farmers, and involvement of other professional organisations.*

#### **V - Member States and Implementation of Production and Marketing Plans**

- **Cristina Borges, Director for Planning, Information and Structural Services, Maritime Affairs and Fisheries Authority of Portugal (DGRM)**

##### Presentation

Cristina Borges (Portugal) explained that, as a central service of the direct administration of the State, the mission of the Directorate-General for Natural Resources, Safety and Maritime Services (DGRM) was to develop maritime safety and services, including the maritime-port sector, the implementation of policies on fisheries, aquaculture, the processing industry and related activities, the preservation and knowledge of marine resources, as well as to ensure the regulation and control of activities in these areas. Ms Borges explained that her directorate was responsible for the management of the fishing fleet, the management of CMO measures, the recognition of POs, the approval of first sale structures for fish, the coordination of the Committee on Trade Names, the coordination of projects submitted under the EMFAF, and the Resilience and Recuperation Program.

Ms Borges recalled that the CMO framework was one of the pillars of the CMO. The current CMO aims to protect producers, ensure environmental sustainability and the economic viability of markets for fisheries and aquaculture products. It improves and strengthens the essential elements previously implemented, such as common marketing standards, consumer information and professional organizations (with a strong emphasis on producer organizations), and introduces new elements such as information on the European market. The CMO Regulation reinforces the responsibilities of





fisheries and aquaculture POs with regard to meeting the objectives of the CFP and the CMO itself. All POs must prepare and submit a PMP to DGRM in order to ensure the environmental sustainability of their fishing and aquaculture activities. The preparation and implementation of production and marketing plans is eligible for funding from the EMFAF.

Ms Borges, regarding the approval process for POs, recalled that the POs are the basic element of the CMO. Producer entities with legal personality that have their registered office in national territory may be recognised as PO's, provided that they fulfil the principles of their internal operation, they are sufficiently active in economic terms in the area to which the application for recognition is related (volume of production), have the capacity to pursue the objectives set out in the CMO, and provide the competent authorities with information (on membership, management model and sources of funding). She added that POs are a group of producer's entities considered to be sufficiently active in economic terms, in the national territory or part of it, in compliance with the rules of competition, while preventing abuse of a dominant position in the market. This must be defined in their constitution and subsequent maintenance of recognition, in terms of the number of members, the volume of marketable production (set of recognised species), and the territory under the management of the PO (port(s) of recognition).

Ms Borges, on the intervention zone of the POs, explained that, regarding the group of species for which recognition is requested, the fishing POs must sell at least 15% of the total production (in tonnes) in its recognition zone (fishing port(s)). Regarding the group of species for which recognition is requested, the aquaculture POs must sell at least 25% of the total production (in tonnes) in its recognition zone (NUT II – Nomenclature of Territorial Units for Statistical Purposes). She proceeded with an overview of the 16 currently recognised fisheries POs in Portugal, which include 13 in the mainland, one in the Autonomous Region of Madeira, and two in the Autonomous Region of the Azores. No aquaculture PO is currently recognised in Portugal.

Ms Borges outlined the characteristics of the fisheries POs in Portugal. The national fishing fleet counted 3,728 vessels with license to operate with at least one fishing gear. Of the latter, 1,813 vessels are members of POs, representing 48.6 per cent of licensed vessels, which, in her view, was a significant membership. 131,000 tonnes of fresh/chilled fish were unloaded in mainland ports. Of



these, 102,000 tonnes were unloaded by members of POs, representing 78% of the total, a very significant contribution. She proceeded with the characterisation of the fleet and the sales of POs. She highlighted that POs allowed for the development of an alternative outlet for canning products resulting from the activities of the member organisations.

Ms Borges explained that the annual presentation of the PMP was an essential condition for maintaining recognition. The DGRM provides a form for completing the PMPs. The POs submit the PMPs, which may be revised, if necessary. The PMP includes a production programme for the species caught or cultivated, a commercialisation strategy aimed at adjusting quantity, quality and supply to market requirements, measures/actions defined to contribute to its objectives, and sanctions applicable to members who breach the decisions adopted in the meantime to implement the plan.

Ms Borges further explained that, through the PMP, the PO defines its management/action based on four mandatory objectives: 1) promotion of viable and sustainable fishing activities, 2) avoiding and reducing undesirable catches, 3) contributing to traceability and consumer information, and 4) contributing to the elimination of illegal fishing. Additionally, there were complementary objectives, of which it was compulsory to select two: 1) improving the conditions under which products are placed on the market, 2) improving economic return, 3) stabilising the market, 4) contributing to food supply (quality and safety) and employment, 5) reducing the environmental impact of the activity. PO's can also pursue other objectives within the scope of their vision/management.

Ms Borges, on the approval steps, highlighted that each POs submits its PMP to DGRM, which is defined as the competent national authority for approval. Through an Annual Activity Report, which complements the PMP, the POs are obliged to draw up an annual report of their activities and submit it to the DGRM. The report model, made available by the DGRM, should be taken into account as a guiding document, in the sense of a certain uniformity of assessment.

Ms Borges recalled that funding for the fisheries sector is one of the oldest components of EU fisheries policy. The current programme is the EMFAF, which amounts to EUR 6.108 billion for the period 2021-2027. The EMFAF, established by Regulation (EU) No 2021/1139 of the European Parliament and of the Council of 7 July 2021, aims to support sustainable fisheries to achieve food security through the



supply of seafood, the promotion of the growth of a sustainable blue economy and the healthy, safe and sustainable management of seas and oceans. Under the EMFAF, the maximum limit for 2024 is 10 per cent of the value of the PO's sales, on the average of the previous three-year period. The aim of the financial support provided aims to strengthen the PO's activity, to assure a more significant role in the day-to-day management, and to provide a better income to their members.

Ms Borges, regarding obligations, highlighted that the European Commission checks the actions of the Member States to ensure compliance with the conditions for recognition. DGRM, as the body responsible for implementing the CMO, checks the conditions for recognition, and checks the obligations for the approval of PMPs.

- **Exchange with the audience**

Ola Öberg (Recirkfisk PO) informed that, in the case of his organisation, an aquaculture PO in Sweden, there was no financing limit of 10% of the value of the POs sales, as his PO did not directly sell the aquaculture products of the members.

Cristina Borges (Portugal) explained that the information was based on an annual survey on the production and sales as well as comparison with information provided by the PO.

Anna Pyć (Polish Trout Breeders Organisation) requested more information on the application process for funding, following the approval of the PMP. Ms Pyć asked, for 2025, how do POs know the amount of funding that they can access. She also asked about the average turnover of the previous years.

Cristina Borges (Portugal) responded that the POs were able to submit applications to the national program in October. The authorities would analyse the report to determine the approval. For the expenses of 2024, the national authority would consider the years of 2021, 2022, and 2023. 10% of the value of the POs sales in those years would be the maximum limit for financing.

Justyna Radzewicz (Poland) explained that, in the case of the Polish administration, the maximum limit for financing was 12% of the value of the sales for three previous years. Ms Radzewicz further explained that it was not required for the PO to place the products on the market. It could be based on the sales of their members.



Pedro Reis Santos (MAC) asked about the relationship between the national authority and the POs.

Cristina Borges (Portugal) highlighted that around 50% of the licensed fishing vessels were members of POs. Ms Borges emphasised the importance of direct contact with the POs. As an example, the DGRM had recently organised an information session and various workshops. The national administration also held meetings to discuss the content of the PMPs submitted by the POs, providing feedback on these.

## **VI - Panel & Presentations on use of Production and Marketing Plans by Producer Organisations (Moderator: Julien Lamothe, Chair of Working Group 1 (EU Production), MAC)**

- **Kenn Skau Fischer, CEO, Danish Fishers Producers Organisation (DFPO)**

### Presentation

Kenn Skau Fischer (DFPO) explained that his PO brought together Danish fishers active in the Baltic Sea, the Kattegat, the Skagerrak, the North Sea, and the Atlantic Ocean. More than 550 fishing vessels are members of the DFPO, of which 440 are vessels below 17 meters, and 270 are vessels below 12 meters. The DFPO is the largest PO in Denmark and one of the largest in the EU, organising fishers in all kinds of fisheries, including mixed demersal fisheries, coastal fishing, industrial fishing, gillnet fishing, fishing with towed gears. The organisation cooperates with 28 local fisheries associations. Mr Skau Fisher highlighted that, in 2023, the landings of the PO totalled €231 million.

Mr Skau Fisher further explained that the organisation counted one and half persons dedicated to the PMP. The main activities under the PMP were advice to local fisheries associations and fishers on fisheries regulation both at national and EU-level, recommendations to national authorities on fisheries matters, co-existence at sea (e.g., wind parks), sustainability (economic, environmental and social, branding and license to operate, and national and international cooperation. He added that all types of activities were included in the PMP, which serves a work catalogue, anchor and indicator. Nevertheless, not all activities are included in the PMP.

Mr Skau Fisher mentioned that the process of the PMP was quite long. The PMP was submitted in the Autumn and might need to be rewritten or amended. Later, a final report must be submitted to



the national authority. There was a pre-payment in the year, which was followed by a final payment after the submission of the final report. In the case of Denmark, the amount of funding depended on a political decision of the Government of the Parliament but was much less than the 10% of the value of the sales for three previous years followed in Portugal.

- **Jacinta Ramírez Ramírez, Projects Director, Organización de Productores Pesqueros Artesanales Lonja de Conil (OPP72)**

### [Presentation](#)

Jacinta Ramírez Ramírez (OPP72) explained that her organisation was active in Andalusia, Spain, focusing on small-scale fishing. The objectives were to promote production with catch plans, promote coordination of supply, stabilise prices, and to promote sustainable fishing, a sustainable balance of artisanal fishing, and international cooperation. In terms of membership, OPP72 has 81 fishing vessels, of which five were between 12 and 14 meters, and a total of 118 producers (101 shipowners and 17 marine producers). The PO operates in three ports: Conil de la Frontera, La Atunara (La Línea de la Concepción), and Rota. For the period of 2021-2023, the average production was of 598.761,37 Kgs, worth 4.670.196, 25€, which represented a value of 7,79 €/kg.

Ms Ramírez emphasised the fundamental role of the PMPs to face the challenges and problems faced by fishers. She highlighted several challenges, such as climate change, primarily affecting coastal zones, the loss of species and displacement of others, the displacement of fishing due to new activities in the context of the blue economy, lack of generational renewal due to difficulties in accessing the activity and the lack of attention, and the decommissioning of the fleet due to administrative obstacles and lack of interest of the government.

Ms Ramírez drew attention to problems in the implementation of the PMPs. The concept of “artisanal fishing” could be damaging to small POs, as there was a lack of a tolerance margin in the definition of the 12 meters as small-scale fishing. The EMFAF theoretically provided financial support for artisanal fishing but was difficult to implement. Across the Member States of the EU, there were differences in the requirements for the establishment of POs and for the access to funding. She





argued that the EU decisions were driven by lobbying, which artisanal fishing had difficulty in accessing, mainly due to the lack of a clear definition.

- **Garazi Rodríguez Valle, Production and Marketing Plans Officer, APROMAR**

### [Presentation](#)

Garazi Rodríguez Valle (APROMAR) explained that her organisation was a professional, voluntary, and nonprofit organisation. APROMAR is composed of farmers, regional associations, suppliers, but also service providers, such as veterinarians, and feed producers, ensuring diversification. Her role was entirely dedicated to the PMP, which is not always a possibility across the Member States.

Ms Rodríguez explained that, for the implementation of the PMP, the national administration made available an excellent online application called “OPPES”, which allowed for more transparency. A close relationship with the administration was maintained, including exchanges on the expected expenditure. The Spanish administration also periodically organised conferences with all the POs. In terms of funding through the EMFAF, the standard aid intensity was 75%. 100% of financing was foreseen for innovation activities, but it was difficult to access in practice due to the unclear definition of “innovation”. The funding was provided through an advance payment and a final payment. She recognised the importance of pre-financing by PO members, as it took around one year to receive the funding. For example, the plan would be submitted in November 2024 and the approval would be the following month, but the payment would be in early 2026. The funding was based on 12% of the total production value of the members of the PO.

Ms Rodríguez argued, concerning the conditions across the EU, that there were too many differences between Member States, for example on aid intensity, aid procedure, and eligible costs. In the case of Spain, there were also differences across regional administrations. It would be relevant to have a manual of good practices across Member States for the training of public servants. As for the adaptation of the PMPs to the current state of the aquaculture sector, Ms Rodríguez stated that PMPs provided a good adaptation to sectoral needs through flexibility and various eligible actions. At the same time, there could be arbitrary decisions by the national authorities, for example to shorten the duration of promotion and communication actions.



- **Laurent Chiron, President, Groupement Qualité Huîtres Marennes Oléron (GQHMO)**

### Presentation

Laurent Chiron (GQHMO) explained that his organisation represented 150 farms, 2000 farmers, 15 000 tonnes of production, €90 million of turnover, and €1.5 million of PO turnover. As a collective organisation, GQHMO counted on one Chairman, himself, and a board composed of 28 oyster farmers. The missions of the organisation covered protection, communication, export development, research and development, and expertise strategy, which was done through an annual PMP. In terms of management, GQHMO holds board meetings six times per year and an annual General Assembly meeting. A quality meeting is also held once per year.

Mr Chiron explained that the PMP, approved every year in November, was relevant for the yearly definition of a global strategy, to analyse if goals are reached, being the best tool to structure a PO. In terms of difficulties, no deposit was provided, and the grants were obtained late, the sustainability indicators were not easy to define for oyster farming, and the certification bodies and communication agencies were not concerned by grants. To improve their implementation, he suggested that there should be a deposit at the beginning of the PMP's period and faster refunding, more fees should be covered, for example on certification and communication, and the overall power of the POs should be improved.

- **Exchange with the moderator**

Julien Lamothe (MAC) highlighted the different results reached across the various sectors and Member States. Mr Lamothe asked the panellists to further describe the difficulties faced in the implementation of the PMPs.

Jacinta Ramírez Ramírez (OPP72) mentioned that, in Spain, there were “national POs” under the remit and rules of the national administration and “regional POs” under the remit of the autonomous communities, which led to higher complexity.

Julien Lamothe (MAC) asked about actions undertaken by the POs beyond the PMPs as well as implementation challenges.



Kenn Skau Fischer (DFPO) drew attention to the catalogue of upcoming actions of his organisation, which included actions financed by the members and by the PMP. While it was easy to develop actions, there was also pressure from political priorities. In his view, the EU framework was sufficient, but the main challenge was the administrative burden, and the amount of documentation required to demonstrate how the funding was spent. He took the opportunity to mention that there was an IBO in Denmark, but that it did not receive funding. Instead, the IBO undertook a coordination role. He called for the possibility of more activities on the consumption of fishery products.

- **Exchange with the audience**

Patrick Murphy (Irish South & West Fish Producers Organisation) commented that the EU framework was against the development of a dominant position by one PO in the market of the corresponding Member State. Nevertheless, since each Member State could provide different levels of aid intensity, one Member State could provide a significant advantage to its operators in the EU market through the provision of more funding. He called on DG MARE to address this matter.

Kenn Skau Fischer (DFPO) responded that, considering the annual landings of €231 million by his organisation, he would welcome receiving funding to the maximum of 10% of total landings, as was the case in Portugal.

Patrick Murphy (Irish South & West Fish Producers Organisation) expressed concern about the different levels of aid available to POs. Mr Murphy exemplified that, in Ireland, a larger rate of aid was provided to small-scale operators. He argued that there could be a significant imbalance across Member States. It was important to avoid dominance through funding.

Cristina Borges (Portugal) highlighted that Portugal counted on 16 POs, which were mainly small-scale operators. Ms Borges informed she took note of Mr Murphy's comments.

Raúl García (SWWAC) asked about the relevance of implementing biannual or triannual plans, particularly for biological studies or communication campaigns.

Garazi Rodríguez Valle (APROMAR) informed that her organisation started implementing pluriannual plans, which could cover two or three years. Ms Rodríguez recognised that most actions required



several years to implement. At the same time, in practice, there were a need to introduce amendments to the PMP across the years of implementation.

Sérgio López (SWWAC) commented that the different approval processes for the PMPs could provide a competitive advantage between Member States.

Anna Pyć (Polish Trout Breeders Organisation), concerning the application for funding, wanted to know if, following the approval of the PMP, the PO could start spending money for the next year. In the case of Poland, the spending could only take place after the approval.

Garazi Rodríguez Valle (APROMAR) responded that, in the case of her organisation, the PMP was approved in December. The PO initially depends on funding from the members. The aid is received at the end of the following year. Ms Rodríguez highlighted that there were specific approval procedures for hiring subcontractors. She emphasised that the POs were very important to meet the objectives of the CMO, but that it was not possible to know what would happen with the funding in 2027. She called for more stability in the funding. Additionally, similar problems were faced in cooperation activities.

## **VII - Breakout session on how to improve the financing and implementation of Production and Marketing Plans**

*The participants were divided into small groups to prepare recommendations on the development and implementation of PMPs, including funding under the EMFAF, level-playing-field across the EU, adaptation to the current status of the fisheries and aquaculture sector.*

## **VIII – Reporting back on the breakout sessions**

Jérémie Souben (FEDOPA) reported that, in the view of his group, there was satisfactory functioning and governance to accommodate the representation of small-scale and large-scale operators in France. In terms of the democratic functioning of the PO, at each meeting, every member was able to verify the legality of decisions. Every two years, the national administration undertook controls on the recognition and functioning of the POs. The POs serve their purpose as structures for cooperation.



As for TAPOs, these showed the diversity across Member States, but there was a difficulty in accessing financing.

Mr Souben highlighted that the extension of PO rules was effective, but rarely used, as the implementation requirements are not in line with the requirements on the ground. On the exclusion from competition rules, he emphasised the relevance for the collective management of the fisheries and for the valorisation of the products. On the implementation of the PMPs, he expressed satisfaction with their functioning and the wide range of actions allowed but expressed concern about the delay in the approval and the payments. In their view, there was a continuation between the EMFF and the EMFAF, so there was no significant impact on the ambition level of the PMPs. He added that the PMPs were a good basis for collaboration between operators and the national authorities.

Thibault Pivetta (EMPA), on behalf of his group, highlighted the importance of more awareness raising among aquaculture farmers on the role of POs. Regarding IBOs, Mr Pivetta highlighted the importance of the recognition of historical IBOs, which allow the structuring of the aquatic supply chains. Therefore, IBOs should be fully recognised as POs.

One audience member highlighted the lack of knowledge among small-scale operators on the benefits of POs. In the case of aquaculture farmers, POs can be attractive structures for good cooperation, but companies need to grow and have more resources. As for the democratic functioning of POs, the functioning is usually positive, but recommendations/guidelines from the EU would be useful. Regarding the possibility to extend PO rules, these are not efficient, as there are significant delays due to the administrative requirements.

Regarding the PMPs, the audience member stated that these are flexible and adaptable to the market, but that the competent authorities do not always follow the same criteria. In terms of level-playing-field, there is a lack of coherence across Member States and, in some cases, even across regions of the same country. The audience member argued that not enough efforts to raise awareness were made. A good cooperation has been established between national authorities and the POs. The PMPs have showed adaptability, for example during the COVID-19 pandemic. It is important that the measures under the PMP benefit the collective and all operators.





Cristina Borges (Portugal), on behalf of her group, stated that no difficulties or restrictions were identified for small-scale operators involved in POs. As for aquaculture farmers, in Portugal, there are no recognised POs dedicated to aquaculture production. In the case of the Outermost Regions of the EU, there are successful aquaculture companies that prefer not to join POs, as the funding procedures would be too time consuming. Ms Borges stated that the current governance structure allows the members to examine the organisation and the decisions of POs through the approval of the work plans by the General Assembly. The legal framework, namely the EU one, is insufficient for TPOs, IBOs, and TAPOs. In her view, the extension of rules of the POs should be used in a cautious manner, as it risks breaking competition rules.

Ms Borges stated that the PMPs are fit for the needs of the POs. There is a lack of coherence in the level-playing-field, but appropriate EU regulation could improve the situation. The efforts of information undertaken by the Commission were insufficient, as no new actions are known since 2014. The POs could have been affected by the delay in the adoption of the EMFF and EMFAF, if no funding was made available to mitigate the impact. The PMPs allow for a good basis for collaboration between operators and the competent authorities. The PMPs are not sufficiently flexible to adapt to the current and future realities faced by the sector. In Portugal, there are no identified issues on the representation of the interests of all members in the PMPs, since the majority of PO members are part of the small-scale fleet.

Ola Öberg (Recirkfisk PO), in relation to aquaculture POs, highlighted that the PMPs were designed from the perspective of fishing quotas. The aquaculture sector faces limitation due to the licensing system of the competent authorities, even though aquaculture farmers are willing to contribute to a higher production and less dependence on imports. The POs should benefit companies that want to expand and promote start-ups, while reducing the administrative burden. Mr Öberg exemplified that, through the EMFF, Sweden was supposed to double the aquaculture production, but that did not take place. Under the EMFAF, there are new provisions to invest in aquaculture production, but more power should be given to the POs. He added that the EU aquaculture sector wants to grow further and provide a higher supply to the EU market.



Christian Vorbeck (Ostrea Production AB) argued that the Pos in Sweden were not strong enough. Mr Vorbeck underscored the importance of a capital investment program as well as the need to support applied science. He called for a new approach to loans, as it was currently difficult for start-ups to access funding.

## **IX – Conclusion**

- **Sérgio López, Chair, SWWAC**

Sérgio López (SWWAC) thanked Mr Lamothe for the initiative of the Working Group 1 of the MAC to initiate a workshop on Producer Organisations, and thanked the Secretariats of the MAC and the SWWAC for the organisation. Mr López emphasised the diversity of POs across the EU, while still facing similar challenges. He added that the implementation of the POs depends on the own initiative of the operators.

Mr López drew attention to issues faced by POs, such as economic rentability, social sustainability, simplification of administrative burden, and the attractiveness of the sector. Furthermore, there were problems related to the decrease in the consumption of fishery and aquaculture products, especially among young families. Therefore, awareness raising campaigns were needed. While POs undertake campaigns through their PMPs, additional general campaigns in collaboration with the public authorities were needed to address this problem.

Mr López recalled that, in 2018, the MAC published a document with guidelines and good practices for the PMPs, which remain available online. He informed that a report of the workshop would be made available, which would be followed by recommendations to the European Commission and to the Member States. He encouraged the members to continue working on the topics addressed.



### List of registered participants

Representative	Organisation
Àngels Segura Unió	AECOC - GS1 Spain
Adrien Simmonet	Union du Mareyage Français (UMF)
Alen Lovrinov	Producer Organization OMEGA 3
Alessandro Manghisi	Aquaculture Stewardship Council
Alonso Abreu Lozano	Asociación de Armadores de Punta del Moral
Anna Pyć	Polish Trout Breeders Organisation
Anna Rokicka	Polish Association of Fish Processors (PSPR)
Anna Swacha-Polańska	Polish Trout Breeders Organisation
Antonio Marzoa Notlevsen	Mediterranean Advisory Council (MEDAC)
Aodh (Hugh) O'Domhnaill	IFPO
Arthur Yon	FROM Nord
Aurelio Bilbao Barandica	OPESCAYA
Brian O'Riordan	Low Impact Fishers of Europe (LIFE)
Brian Thomsen	Aquaculture Advisory Council (AAC)
Cécile Fouquet	Aliénor
Carlos José das Neves Gonçalves	DGRM (Portugal)
Chloé Pocheau	South Western Waters Advisory Council (SWWAC)
Christian Vorbeck	Ostrea Production AB
Claudia Orlandini	Low Impact Fishers of Europe (LIFE)
Cristina Borges	DGRM (Portugal)
Daniela Costa	Outermost Regions Advisory Council (CCRUP)
David Milly	Pêcheurs d'Aquitaine
Driss Oubakrim	Association des amis Halieutis des commerçants du poisson à Agadir et Laayoune
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Esben Sverdrup-Jensen	EAPO
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Representative	Organisation
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Francisco Fernandez	OPROMAR
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Garazi Rodríguez Valle	APROMAR
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Javier Ojeda	FEAP
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Jules Danto	EAPO
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Justyna Radzewicz	Ministry of Agriculture and Rural Development (Poland)
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Laure Guillevic	WWF
Làurene Jolly	European Commission
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