

Study on Common Market Organisation (CMO)

Market Advisory Council – WG 1
17/09/2025

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Agenda

- Objectives and methodology
- Key findings on POs, APOs and IBOs

Objectives and methodology

- Background and objectives
- Key questions on POs, APOs, and IBOs
- Key methodological aspects
- Timeline

Background and objectives

- **2013 reform of the Common Fisheries Policy (CFP)** and CMO aimed to:
 - Strengthen sustainability in EU fisheries/aquaculture.
 - Improve market position of EU producers.
 - Enhance transparency via marketing standards, consumer information, and market intelligence.
- Since the reform, POs (Producer Organisations) have a pivotal role in implementing the CFP through **collective management**
- The objectives of the study were to:
 - Feed into the **ongoing CFP evaluation**
 - Provide **concrete and applicable recommendations** / identified **best practices**
 - Identify **possible improvements to the CMO Regulation**

Key study questions on POs, APOs and IBOs

Representativity of POs, IBOs and APOs

What is the representativity of POs, IBOs and APOs in the EU, in the different MS and for the main species caught by EU fisheries? To what extent do they represent small-scale producers and aquaculture producers?

Effectiveness of CMO Regulation

Does the CMO Regulation sufficiently empowers POs, IBOs and APOs to achieve the CFP and CMO objectives (including through public funding)? What is the impact of the digitization of the sector?

Recognition rules established by MS

What are the rules established and implemented by MS for the recognition of POs, IBOs and APOs, and checks thereof ?

Governance and functioning of POs

What are the characteristics of membership? How is governance organized? What are the decision-making processes? What are the impacts on achievements?

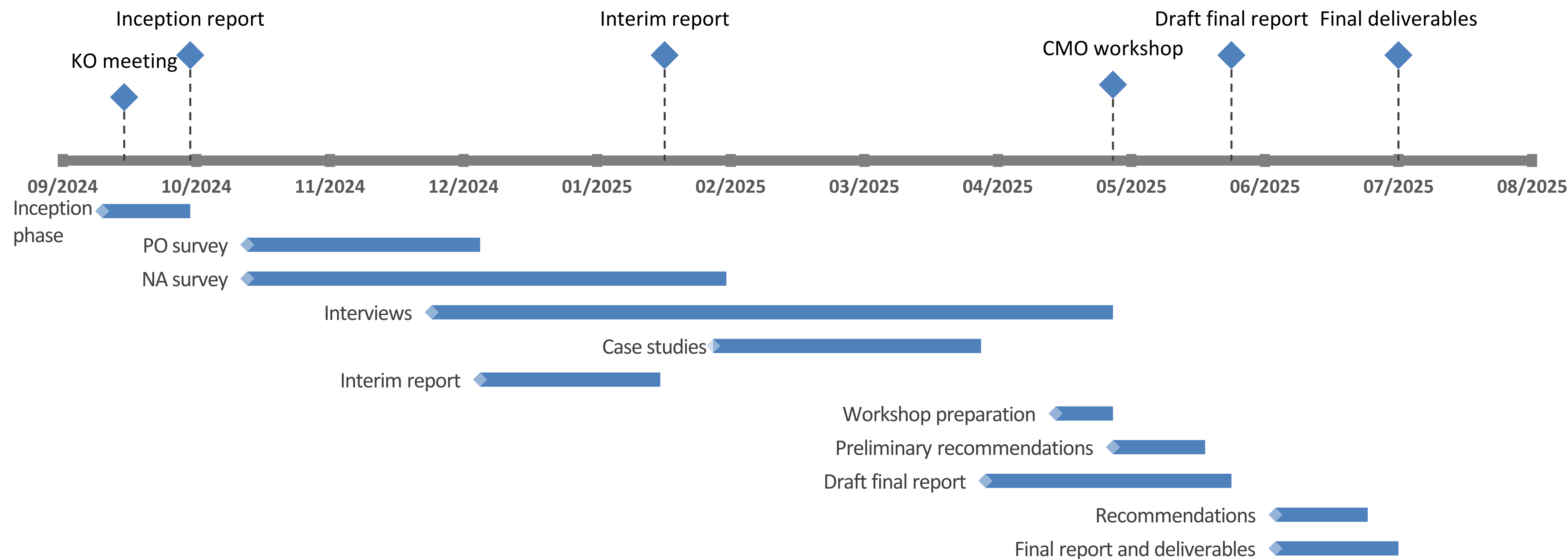
Methodology

Geographical and time scope: EU27 (2013–2025)

Data sources

- Desk research (regulations, STECF reports, Eurobarometer, academic literature).
- Online PO survey (53 respondents from 180 POs/APOs/IBOs).
- National authorities survey (25 MS).
- 37 stakeholder interviews + 15 PO case studies (DK, FR, IE, PL, ES).
- Workshop (April 2025) with 50 stakeholders.

Timeline



Key findings

- POs' share in EU production
- Recognition rules, checks and sanction schemes
- Organisation and democratic functioning of POs
- POs resources and achievements
- APOs and IBOs

POs' share in EU production

Overall representativity

- No public official and comparable figures, but based on available data, **the representativity of POs is assessed to have increased since the reform of the CMO**
- Representativity of POs is highly variable depending on MS and species, from 0 to 100% (NL)
- The **share of POs** in the production is **higher for fisheries (56%) than for aquaculture (37%)**
- In fisheries, the share of POs is the highest for albacore tuna, plaice, herring and Norway lobster (above 73%)

Small-scale producers

- Most fishery POs include SSF and all aquaculture POs include SMEs, which are **generally represented on the board**
 - However, **the share of SSF** that are members of a PO **remains relatively low in most countries**
 - Main barriers include **financial constraints, geographical dispersion, socio-cultural factors** (independence, distrust).
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Recognition rules

- **Not all Member States have adopted national implementing acts** to operationalise recognition conditions in the national context. Two Member States have only guidance documents, and three MS have neither legislation nor guidance documents
 - National legislation or guidance documents identify **quantitative threshold for sufficient economic activity** (almost all MS, sometimes with specific thresholds for SSF), **minimum number of members** (some) and **concentration of voting rights** (a few).
 - Lack of **understanding** by national authorities regarding checks of compliance with **competition rules** and the absence of any abuse of a dominant position
 - Lack of a **clear procedure for withdrawal of recognition at the initiative of the POs**, which tends to result in unnecessary administrative burden
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Recognition checks and sanction schemes

- Checks rely on the analysis of **documentary evidence**, generally supported by standardised operational procedures (SOPs), but not always, with varying frequencies
 - **Only a few Member States consult the national register of companies to identify the owners of the legal members of POs, as part of their recognition checks**
 - Genuine plurality of members is generally not considered as an issue due to the importance of natural persons among members
 - Limits the possibility of identifying potential risks of concentration of voting rights
 - Non-compliance issues are generally addressed through **recommendations by the national authorities leading to changes in statutes are internal rules**
 - **Withdrawal of recognition occur mainly as a result of**
 - Insufficient economic activity
 - Failure to deliver a production and marketing plan
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Organisation and democratic functioning of POs

Topics	Key findings from the survey sample and case studies
Legal forms and composition	<ul style="list-style-type: none">• 47% non-profits, 36% cooperatives, 17% companies• Genuine plurality of members generally ensured by the presence of natural persons among members or checks of UBOs for POs with only legal persons as members• The representation on the board of different types of members (e.g. small-scale/large scale, different segments are geographical location) is generally ensured through formal rules• Membership fees are generally lower for small-scale producers
Voting rights	<ul style="list-style-type: none">• Most common rule is 1 member = 1 vote• Voting rights can also be associated with vessels or be proportional to the activity (turnover)• Concentration of voting rights is limited by internal rules or national framework
Decision-making	<ul style="list-style-type: none">• Decision by consensus is very common• Formal technical groups are used to discuss specific topics• POs rely extensively on informal communication channels
Sanctions	<ul style="list-style-type: none">• Sanction systems include financial and administrative sanctions, but are rarely used• Warnings and support to reach compliance are favoured when possible• Exclusion is rare and results from serious infringements of internal rules

POs resources

- **Funding sources**

- Membership fees and other income generated by POs represent the main source of income for a majority of respondents to the online survey (64%)
- However, membership fees vary considerably depending on the size and financial capacity of members (avg. 0.5% of production value)
- Public funding remains essential for many POs, in particular for POs representing mainly or exclusively small-scale producers
- Very significant differences among MS in terms of the level of support granted to POs through EMFF/EMFAF (from less than kEUR 20 per year per to over kEUR 200 per year per PO)

- **Human resources are determined by the level of membership fees and/or public funding**

POs achievements

- **PO contributions**

- Control and management of supply: quota management to various degrees depending on MS, planning, crisis management, etc.
- Market-related activities: market knowledge, joint participation in commercial fairs, communication campaigns, etc.
- Product quality, transparency and sustainability: certifications, quality standards, traceability
- Support to CFP compliance (training and capacity building), research projects and digitisation

- **Main limitations**

- Limited bargaining power: only few POs manage sales and in position to negotiate prices
 - Access to financing (delays, no pre-financing, uncertainty related to annual application cycles, etc.)
 - Complexity of regulatory framework and differences among MS
 - Administrative burden
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APOs and IBOs

	Contributions	Limitations
APOs	<ul style="list-style-type: none">Enhances POs' negotiating and advocacy power	<ul style="list-style-type: none">Members' diverging interestsEMFAF measures targeting POs are primarily designed to support measures at national level, limiting the interest of establishing transnational POs
IBOs	<ul style="list-style-type: none">Facilitate supply chain coordination	<ul style="list-style-type: none">Sometimes limited to accessing promotion funds rather than truly ensuring coordination across the supply chain

Thank you for your attention!

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