

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



EAPO / AEOP

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Letter by e-mail attachment to:

- DG MARE, Director: Charlina.Vitcheva@ec.europa.eu
- DG Mare, Head of Unit Control Francesca.Arena@ec.europa.eu

CC: National administrative contacts for fisheries (BE, DE, DK, ES, FR, IE, NL, PL, SW, UK)

Dear Ms. Vitcheva,

Subject: EAPO position on weighing landings

The fisheries in the EU are regulated and operate at a continental wide level. Fishermen fish in the EU waters and land their catch in the port they find is appropriate (in relation to the fishing ground distance, their market destination, and other factors).

Under the Control Regulation requirements, weighing of fish products has to take place at the place of landing before transport, storage or sale¹. However, it is possible to weigh landings after transport if this is provided for in the control plan of the Member State². It is common practise to use this latter provision to allow for transport before weighing. It is particularly the case when fish is transported to a different Member State from the one it is landed in. In the case of such cross-border transport prior to weighing, provisions must be detailed in a Common Control Program between the two Member States³.

Currently specific examples exist where fishermen face challenges to use this provision. In Denmark the regular process of landing in ports before transporting fish to its first sale location in another Member State, and then weigh it as it is unloaded from the sealed truck, is no longer allowed since 1 April. This has an impact on the quality of the goods, and thus the first sale price. It also generates unnecessary costs for producers and affects the production and marketing planning. This stems from

¹ Fishery control Regulation EC No 1224/2009 Article 60 (1)

² Fishery control Regulation EC No 1224/2009 Article 61 (1)

³ Fishery control Regulation EC No 1224/2009 Article 61 (2)

the fact that Common Control Programs of Denmark with other Member States seem to be hampered by the Commission.

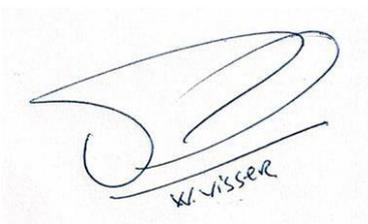
Furthermore, the Covid-19 crisis has stricken the sector hard in economic terms and in reaction to market closures, some fishers have been looking for new markets, landing their catch where they did not use to and in some cases Common Control Programmes are not in place.

The Common Control Programmes have to be initiated and agreed between the two member States, approved by the Commission. To address the above mentioned negative consequences EAPO calls for a more flexible approach to weighing at landing, so that this can continue to be substituted by using logbook data, transport documents, sealing of transports and weighing at point of first sale. This includes an expeditious adoption of common control programmes where necessary. As the control regulation is being revised, the Commission seems reluctant to consider some Common Control Programmes. However, this poses a threat to the fisheries sector where a proportion of the products are landed abroad from their first sale market.

In addition to this cross-border issues, in Ireland, the pelagic fishing industry endures the continuation of domestic problems. It faces difficulties where the control authority, the Sea Fisheries Protection Authority (SFPA), refuses to use the exemption allowing for weighing pelagic species in the processing plant over the fully calibrated flow scale with cameras. Instead, the SFPA insists on weighing the specialised transport tankers over a weigh bridge as part of the 5% and 7.5% full monitoring requirements. This is a totally inaccurate way of working as water is being weighed as fish. This is not in accordance with the requirement in the control regulation to accurately weigh the landings.

The current COVID-19 crisis has highlighted these underlying issues around weighing and common control programmes. EAPO finds that it is of paramount importance that the current regulation is applied correctly and asks that DG MARE's Unit, responsible for control, pays specific attention to the cases listed above in order to quickly allow solutions for a workable landing process.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Visser', with the name 'W. VISSEER' printed in small black letters below it.

Pim Visser,
President