

Extract from CFFA's contribution to the Commission's consultation on the Green Paper on the reform of the CFP

5.4. Trade and markets – from catch to consumer

General comments

In a global context of decreasing fish resources, the way fish trade is conducted can play an important role for supporting the transition towards sustainable fisheries in European waters and beyond.

We feel there are three important aspects to be looked into in the process of reform:

- Promoting sustainable fisheries through EU trade (imports) policy,
- Ensuring a fair price for the producers,
- Promoting a change of the consumer's attitude and adapt labeling accordingly.

Promoting sustainable fisheries through EU trade (imports) policy

In as much as the EU fish market is the world biggest market for fish products and relies heavily on imports (*up to 90% for some categories*), we feel that EU access to market conditions can play an important role to contribute to sustainable fisheries both in Europe and in third countries, ensuring that such trade does not lead to environmental degradation or undermine the human rights and food security of fishing communities.

We therefore welcome the EC current efforts to develop minimum criteria for labeling sustainable fishing. We feel this should be a first step, to help develop minimum criteria for sustainable fishing to be ultimately applied to all products, EU produced or imported, taking into consideration not only environmental issues, but also ethical and social issues (decent working conditions, etc).

However, particularly when third countries are developing countries, it is crucial that, before any conditionality is introduced to access the EU market, an efficient, user friendly, transparent cooperation program is put in place, to ensure such conditionality does not become a non-trade barrier for third countries producers, and ensure compatibility with WTO rules.

Lessons can be drawn from the long standing EU-ACP partnership experience, where access to markets has been accompanied by support programs, with mitigated results. A more recent experience is the introduction of the catch certification scheme (part of the IUU regulation) for third country products, where a whole set of initiatives have been taken to accommodate the specific needs of developing countries (flexibility for products from the third country artisanal sector, information seminars, etc). Another example is the *Generalized System of Preferences (GSP +)* where third countries, in order to access EU market duty free, have to sign up 27 international conventions related to sustainable development in its wider sense (including human rights aspects etc). Again, in this case, no efficient cooperation scheme seems to be in place to ensure the third country has the capacity to implement these conventions.

The introduction of '*sustainable development conditionalities*' should also apply to aquaculture products imports, which are increasingly important supply sources for the EU market and often compete with EU products, such as salmon from Chile and *basa* from Vietnam.

In the case of Chile, although the EU-Chile free trade and cooperation agreement signed in 2003 promotes sustainable development and human rights, the Chilean salmon producing industry does not respect the rights of workers, neither does it respect environmental good practice and basic standards.

This calls for more coherence between EU trade, fisheries and development policies.

Ensuring a fair price for the producers

We feel that, to move towards sustainable fisheries, there needs to be a change of paradigm, moving from high volumes/low value fisheries to low volumes/high value fisheries. Given the state of stocks in Europe and in third countries, there is a need to reduce the volume of catches¹.

Therefore, in a situation where the volumes of catches are reducing, and where we want producers and fishing communities in Europe and third countries to enjoy decent revenues, working and living conditions, we need to look at how to improve fish quality to get a higher value for the product, and ensure a fair share of this value comes to the producers and fishing communities. It's only if the producers supplying EU markets, either in Europe or in third countries, receive a fair price for their fish that they will be able to catch less and contribute to the establishment of sustainable fisheries.

An important element for fishermen to get better prices for their fish is to get themselves better organised and better informed about the structure and the evolution of prices. An observatory for the fish prices, as proposed by some professionals, combined with an appropriate support for producers to organise, could give them more strength to influence the price they get. Particular attention should be paid to how to organise the dialogue between the producers and big retailers, who are highly organised and tend to impose low prices to the producers.

This type of situation, - where fishermen do not receive a fair price for their fish -, also exists in third countries with which the European Union has partnerships (EPAs, interim EPAs or FPAs). In the support granted to these third countries for promoting sustainable fisheries, similar topics should be discussed for potential EU support: better organisation of the fishermen, particularly small scale fishing sector, price observatory, emphasis on quality production, etc.

But it is also crucial to look at ways to improve the quality of the fish – or better preserve it – as often said 'once out of the water, fish starts to lose value'. Efforts still need to be made to improve the intrinsic quality of the fish (hygiene, organo-leptic qualities, etc.) and it is therefore necessary to ensure a constructive dialogue and good coordination with the other DGs dealing with development, food and market issues having an impact on fishery and aquaculture products (DG SANCO, TRADE, DEV, ENV, etc.).

But there is also a need to rethink what is 'quality' and not to limit it to the intrinsic characteristics of the fish but also to look at quality in terms of environmental and social, ethical standards.

Promoting a change of the consumer's attitude and adapt labelling accordingly

There is a need for a fundamental change of the consumer's approach to fish consumption, to be compatible with an environmental and socio-economically sustainable fishing model that privileges low volumes of catches and better prices for the fishermen: European consumers should be encouraged to eat high quality fish products, and pay a fair price for it.

¹ We do not think aquaculture can fill the gap of diminishing wild resources available for the market, if aquaculture has to comply with sustainable development basic principles – see chapter on aquaculture.

It is therefore necessary that public awareness raising campaigns towards the consumers insist on the importance of eating quality fish products rather than quantity. There is a need to demystify quantitative fish consumption ('two portions a week to get your omega 3 supply...').

To achieve that, the first step should be to ensure a better traceability of fish products, including imports, so that consumers can make an informed choice between quality products (often more expensive), and others. Labelling regulations should be reviewed to allow consumers to make informed choices along those lines.

There needs to be a continuum of information from the producers to the consumers.

Therefore, we feel the labelling regulation should be reviewed to make its provisions more stringent for fish products, to make the consumer able to distinguish between a product that comes from an over-fished stock and a product that comes from a healthy stock; a product sold fresh and a product that has been defrosted; a product coming from fish farming and a product caught wild, a product that has been produced with low carbon emission and one which has not, etc. Consumers should also be able to assess the nutritional value of the fish they buy.