



Brussels, 10 October 2023

**Att. Of Council of European Union and European Commission**

**Secretary-General** Mrs. Thérèse Blanchet

**Director-General for Agriculture, Fisheries, Social Affairs and Health** Mr. Cesare Onestini

**Commissioner DG MARE** Mr. Virginijus Sinkevičius

**Commissioner DG TRADE** Mr. Valdis Dombrovskis

**Subject:** Ongoing Negotiations on Autonomous Tariff Quota Regime and Next Cycle (2024-2025) - Concerns and Recommendations

**Dear Members of the Council of the European Union and the European Commission,**

We refer to the Autonomous Tariff Quota Regulation opening and providing for the management of autonomous Union tariff quotas for certain fishery products.

AIPCE CEP fully acknowledge the complex political context surrounding the ongoing negotiations on the next cycle of this Regulation, especially in light of the Russian aggression in Ukraine. However, we would like to take the opportunity to stress again our market's high dependency on imports of Russian fish, both as a raw material for direct processing in the EU and as a source of supply for intermediate processing in other third countries [such as China] prior to final added-value operations here.

It is worth noting that the Commission made a deliberate decision to exclude basic food products from the initial sanctions for various reasons. This decision was motivated by food security concerns and the impact that sanctions would have on the inflation rates, cost of food products for end consumers, especially for households with lower incomes and the overall cost of living.

We therefore appreciate the Council's recognition of the substantial dependency of several industrial sectors on raw materials originating from Russia. Examples are the industrial products that have been excluded from sanctions due to their very high dependency on Russian supplies.

While we fully comprehend the reasoning behind the Commission's proposal, we must emphasize that any transition to alternative raw materials in any supply chain will take time and will affect the ability of the sector to access essential products. We urge that any significant changes to well established supply chains be implemented gradually to mitigate market distortions and lack of availability of affordable and healthy seafood for consumers.

If the proposal regarding Russian fish is accepted, we urge for a transition period of one year to enable the value chain to adjust to the significant market impact and its consequences. This could be done with a provision that exempts Russian fish from sanctions until 1 Jan 2025.

To fully understand the impact of the proposal, we would like to stress the importance of using the latest available data when making assumptions and decisions. As of now, the most recent data at our disposal is from the year 2022. It is crucial that the industry and policymakers have access to up-to-date and complete information to make informed choices and develop strategies that are in the best interest of both the industry and consumers. A significant amount of Russian fish enters the EU after first handling in China. These numbers have to be taken onboard when drawing conclusions on import dependence.

Additionally, we kindly request that the industry be actively consulted when introducing any new specie or raw materials into the supply chain. A collaborative approach ensures that the industry is well-prepared to manufacture and bring new products to the market efficiently. We believe that involving stakeholders in decision-making processes leads to more effective and sustainable outcomes.

Finally, we would like to express our gratitude to the European Commission and Member States for their attention to this important matter. We understand the challenges posed by the current geopolitical landscape and appreciate your efforts to balance political considerations with the needs of the industry and consumers.

We remain committed to working closely with you to ensure the resilience and sustainability of the fish processing and trade industry within the European Union. Your continued support and cooperation are invaluable to our sector's success.

Thank you for your time and consideration.

With kind regards,

AIPCE President  
Guus Pastoor



CEP President  
Yobana Bermudez

