



Brussels, 5<sup>th</sup> April 2016

## AIPCE-CEP<sup>i</sup> contribution to the Evaluation of the Regulation 1224/2009

In response to the [Commission consultation on the Evaluation of the Regulation 1224/2009 on fisheries control](#), AIPCE-CEP would like to comment on two specific areas: the promotion of the level playing field and the simplification and reduction of administrative burden.

Our comments refer to the provisions in force which are of crucial interest for the EU fish processing and trading, notably Article 58(par.7) on Traceability in Council Regulation 1224/2009 and Article 67(par 12.) on Information on lots in Implementing Regulation 404/2011.<sup>ii</sup>

### Promotion of the level playing field

The whole chain of production and marketing is covered in the current fisheries control regime with the principle of from the net to the plate; however there has not been any EU initiative to harmonise this approach.

This results in different implementation levels across the EU which impedes an EU coherent and comprehensive control and traceability system, apart from causing distortion of competition and barriers to trade.

The experience so far proves that the comprehensive traceability system is burdensome for operators and extremely complicated, notably given the fact that the interpretation on how to apply Article 58 on traceability differs from one Member State to another.

For the sake of simplicity, we recommend to opt in the implementation for the traceability system provided in Regulation 178/2002, which is based on the principle of “one step back – one step forward” and has proven effective and efficient.

### Simplification and reduction of administrative burden

The current control system relies on an intense collection, transmission, validation and exchange of data among different players which, instead of less administrative burden, has entailed much more complexity in the exchange of data between different players. There is therefore a lack of EU added value which reinforces a preference for the principle of “one step back – one step forward” (under in Regulation 178/2002) as a more adapted system.

\* \* \*

---

<sup>i</sup> AIPCE-CEP represents the Fish Processing and Trading National Associations from Belgium, Denmark, Finland, France, Germany, Ireland, Italy, NL, Poland, Portugal, Spain, Sweden and UK. This sector accounts for 120.000 employees, 3.500 enterprises and a production value of around €27 billion (<http://www.aipce-cep.org/>).

<sup>ii</sup>

A. Council Regulation 1224/2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy - **Article 58 Traceability** - 7. The information listed in points (a) to (f) of paragraph 5 shall not apply to fisheries and aquaculture products imported into the Union with catch certificates submitted in accordance with Regulation (EC) No 1005/2008.

B. Commission Implementing Regulation (EU) 404 / 2011 of 8 April 2011 laying down detailed rules for the implementation of Council Regulation (EC) n.1224/2009 - **Article 67 Information on lots** - 12. The information listed in Article 58(5) of the Control Regulation shall not apply to fisheries and aquaculture products falling under headings 1604 and 1605 of Chapter 16 of the Combined Nomenclature.