



EUROPEAN COMMISSION  
IMPACT ASSESSMENT BOARD

Brussels,  
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## Opinion

### Title

**DG MARE - Impact Assessment on a proposal on market policy for fisheries and aquaculture products.**

**(draft version of 10 February 2011)**

### **(A) Context**

The first component of the Common Fisheries Policies (CFP) to be put in place back in 1970, the Common Market Organisation (CMO) for fisheries and aquaculture products is currently implemented through a regulatory framework that includes 4 Council regulations and 23 Commission regulations. Building upon the results of various evaluations and studies of the key Council Regulation (EC) No 104/2000, the Commission is planning to accompany its foreseen comprehensive reform of the overall CFP with a separate legislative proposal on a revised market policy for fishery and aquaculture products.

### **(B) Overall assessment**

**The report needs to be significantly improved in several important respects. Its analysis should be clearly set within the context of the overall CFP reform, explaining why and how a reformed CMO pillar could contribute to the CFP overarching sustainability goal despite evaluation findings indicating marginal CMO effectiveness so far. In so doing, the report should clarify the underlying intervention logic by better explaining how individual measures would contribute to the initiative's objectives. Finally, the report should improve the comparison of options on the basis of a strengthened analysis of impacts, particularly with respect to implementation costs, simplification benefits and distributional effects.**

**Given the nature of these recommendations, the Board asks DG Mare to submit a revised version of the report, on which it will issue a new opinion.**

### **(C) Main recommendations for improvements**

**(1) Set the analysis within the wider context of the CFP reform.** The analysis of the problems affecting the CMO, the definition of its revised objectives and the assessment of the available policy options should be set within the context of the overall CFP reform. Starting from a brief summary of the latter's key features (and notably its overarching concern with sustainability rather than income support), the report should clearly indicate what role a reformed CMO pillar would play within the renewed CFP. Given this revised function for the CMO, the report should then explain why and how existing CMO instruments should be modified rather than abandoned since evaluation evidence suggests they have only had a marginal impact. In so doing, the report should - whenever relevant - highlight how proposed CMO measures would interact with other components of the CFP reform package (in particular by clarifying the role of strengthened producers' organisations (POs) with respect to the introduction of individual transferable fishing rights and the management of fisheries and prices).

**(2) Clarify and better justify the intervention logic.** First, the report should more systematically analyze all problems addressed by the policy options. A problem tree should succinctly illustrate the interactions among problems and their underlying drivers. Secondly, the report should also more clearly establish the links between these problems and the initiative's objectives and should present well identified operational objectives. Thirdly, the exact content of the policy options, the differences among them and the ways through which individual measures would contribute to the objectives should be much more clearly presented. In particular, the report should explain how exactly POs capacity to plan production and improve its marketing would be enhanced and more generally what the various measures to increase "support" would entail (financial enhancements or other types of incentives?). Finally, the report should clarify the content of the preferred options regarding autonomous tariff reductions and information requirements (notably explaining that labelling requirements would complement rather than replace private initiatives).

**(3) Strengthen the analysis of impacts and the comparison of options.** The report should strengthen the analysis of impacts, providing more evidence and/or quantitative analysis (or explaining why this may not be possible for some measures). The report should, in particular, provide more details on and improve the assessment of implementation costs in general and impacts on the EU budget in particular (albeit without pre-judging decisions on the future EU financial framework). The report should also analyze in greater depth simplification gains and administrative burden reductions. The impacts of the proposed sub-options for autonomous tariff reductions should also be more clearly and coherently analysed. In addition, the analysis should highlight any relevant difference in impacts between the fisheries and aquaculture sectors as well as among identified stakeholders and different types of EU regions. Finally, on the basis of the strengthened analysis of impacts, the report should explicitly compare options in terms of their effectiveness, efficiency and coherence.

*Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.*

**(D) Procedure and presentation.**

The report should supply an earlier and more extensive presentation of CMO tools. The use of tables for textual presentation in several sections should be reconsidered to facilitate reading. A fully developed executive summary as described in the impact assessment guidelines should be added.

<b>(E) IAB scrutiny process</b>	
Reference number	2011/MARE/004
External expertise used	No
Date of Board Meeting	9 March 2011