ATQ CYCLE 2021-2023

AIPCE-CEP

(compiled on 7th of February 2020)

Note: the 2019 utilisation is taken from EU data bank on the 7th of February 2020

Preamble:

This document is compiling the interests of all AIPCE-CEP members for the new round of ATQs. In the case that there is no common suggestion, the deviant opinion is marked by a footnote. The requested quantities are not taking into account the leave of UK because of missing valid data. In the case that all quotas are reduced due to the leave of UK, AIPCE-CEP request a period of two instead of three years to adjust the quotas to the real market needs in time. The 2019 utilisation is taken from EU data bank on the 7th of February 2020.
The members of AIPCE-CEP are welcoming any request from EU Commission and EU member states.

A: SPECIES within Regulation 2018/1977

09.2746: Southern Red Snapper

CN Code + TARIC		Southern red snapper (*Lutjanus purpureus*), fresh, chilled, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0302 89 90	30	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**1.500**		**1.500**	**1.500**	**filleting**
Utilisation (%)		**86,0**	**63,2**	**878t (59%)**		

RATIONALE

This is a relatively small ATQ but we are able to demonstrate that we are utilizing the majority of the quota. There is no self-sufficiency in the species as it is all caught outside of EU waters.

Typically the business dealing in this material are smaller companies specializing in servicing niche markets and for them this quota is an important source of raw material.

09.2748: Hard fish roes

CN Code + TARIC		Hard fish roes enclosed in the ovarian membrane, fresh, chilled or frozen, salted or in brine, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0302 90 00 ex 0303 90 90 ex 0305 20 00	95 91 30	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**7.000**		**5.700**	**5.700**	**defreezing cleaning washing repacking pasteurizing**
Utilisation (%)		**38,7**	**39,0**	**3,516 (62%)**		

RATIONALE

The item has important markets in the EU, in this case Northern Europe and Greece, and represents an important sector for those specializing in this material. Mainly the North East Atlantic provides the product and we are of limited self-sufficiency.

09.2750: Hard fish roes, washed, salted or in brine

CN Code + TARIC		Hard fish roes, washed, cleaned of adherent organs and simply salted or in brine, for the manufacture of caviar substitutes			2021-2023 REQUEST (t)	Type of processing operation
ex 0305 20 00 ex 1604 32 00	35 20	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**3.000**		**1.500**	**1.500**	**canning repacking pasteurizing**
Utilisation (%)		**37,0**	**32,0**	**529 (35%)**		

RATIONALE

This item is made up of materials made from a range of species the mix of which is relatively unstable but the key characteristic is that they are exclusively fished outside of EU waters. Utilisation appears to be low because of the exclusion of 1604 3200 products. The retrospective opening of this quota for 2019 in the year 2020 (adopted by EU Council on 20th February 2020) will bring the quota up to 100% use.

We argue that CN code 1604 32 00 20 should be kept within this quota, because we consider the processing step (pasteurization) is qualifying process regard to article 3 and 4 of the regulation.

09.2754: Anchovies frozen

CN Code + TARIC		Anchovies (*Engraulis anchoita* and *Engraulis capensis*), frozen, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0303 59 10	10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**1.000**		**500**	**500**	**canning marinating**
Utilisation (%)		**0**	**0**	**0 (0%)**		

RATIONALE

This new item was not reportedly used since it was opened in the ATQ regulation.
It is however important to maintain an ATQ at a certain quantity, in order to provide long term procurement opportunities to EU processors, in case local procurement is discontinued (lower TAC or lower catches), which may occur during the triennium.

The main argument is that anchovy is a short-life species whose abundance can vary a lot over a short period, depending on trophic conditions of stock recruitment. The "no-use" experience is a proof that ATQ does not create adverse competition to EU fishermen because processors prefer local procurement when it is available. This ATQ is to be considered a "safety net" for processors. We call for its continuation for the new round despite no-use at the current level of 500 tonnes and without mixing this item with the salted or brined one..

09.2759: Cod H&G

CN Code + TARIC		Cod (*Gadus morhua, Gadus ogac, Gadus macrocephalus*) and fish of the species *Boreogadus saida*, excluding livers and roes, fresh, chilled or frozen, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0302 51 10 ex 0302 51 90 ex 0302 59 10 ex 0303 63 10 ex 0303 63 30 ex 0303 63 90 ex 0303 69 10	20 10 10 10 10 10 10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**75.000**		**95.000**	**140.000**	**fileting salting cooking ingredient in ready meals**
Utilisation (%)		**94.8 (after safeguard clause)**	**86 (after safeguard clause)**	**72,399 (76%)**		

RATIONALE

This material is an important raw material for the EU processing sector and represents a significant source of employment and value addition in several member states. The EU TAC in 2020 has been reduced by 50 pct. compared to 2019 and in 2018 EU catches decreased by 14.000 tons. Our request would be to increase the ATQ to 140.000 tons to reflect the ongoing growth of cod needs in the EU. The import dependency is around 90 pct. for this item. Continued access to northern cod (Norway, Iceland, Russia) is essential if processing industry is to be viable. It is essential that we maintain room to cover further increased needs especially in Eastern European countries.

09.2760: Whole hake

CN Code + TARIC		Hake (*Merluccius spp*. excluding *Merluccius merluccius, Urophycis spp.*), and Pink cusk-eel (*Genypterus blacodes*), frozen, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0303 66 11 ex 0303 66 12 ex 0303 66 13 ex 0303 66 19 ex 0303 89 70 ex 0303 89 90	10 10 10 11 91 10 30	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**15.000**		**12.000**	**12.000 + see footnote***	**filleting smoking slicing for materials**
Utilisation (%)		**22.6**	**19.8**	**3.887t (32%)**		

*Footnote for 09.2760: Poland requests an increase up to 40.000 tonnes

RATIONALE

Despite the decrease in utilization last year, we request that the quota remain the same for the next round of quotas, since historically it is possible to verify the almost total utilization of a quota of 12,000 tons.

The rationale for the increase up to 40,000 tonnes is that *Merluccius hubbsi* H&G becomes an important raw material for the Polish smoking industry as an economical substitution of traditionally used species (cod, saithe etc) that meanwhile got scarce and very expensive. In central and east Europe the market for hake is now being developed with great potential.

09.2761: Hoki fillets and meat, frozen

CN Code + TARIC		Blue grenadier (*Macroronus* spp.), frozen fillets and other meat for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0304 79 50 ex 0304 79 90 ex 0304 95 90	10 11 17 11 17	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**17.500**		**17.500**	**30.000**	**ingredient in ready meals coating battering bread-crumbing MAP**
Utilisation (%)		**86.2**	**55.8**	**9.161t (52%)**		

RATIONALE

For the period of 2021-2023 we expect increasing market demand especially in eastern EU countries at a consequence of reduced cod quota in North Sea and Baltic Sea. Hoki is accepted as substitute for shortfalls in the supply of whitefish species.

09.2765: Cod in salted or brine

CN Code + TARIC		Cod (*Gadus morhua, Gadus ogac, Gadus macrocephalus*) and fish of the species *Boreogadus saida*, salted or in brine, but not dried or smoked, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0305 62 00 ex 0305 69 10	20 25 29 10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**4.000**		**3.500**	**3.500**	**desalting dried-salting to use it after in different commercial presentations**
Utilisation (%)		**59.4**	**50.0**	**1.962t (56%)**		

RATIONALE

This quota is used by the processing industry to carry out the transformation operations that increase the added value of the product. The EU industry is specialized in the stages of transformation after salting. Thus, this raw material is used mainly for the production of dried-salted cod and desalted cod products.

The desalted Cod has very different organoleptic properties compared to the frozen or chilled one. So, the industry needs this type of raw material to develop a variety of products after desalting , for example a MAP product.

It is necessary to maintain the status quo quantity due to the fact that, since 2016, the world cod catches have decreased year after year, from 1,329,000 tons in 2016 to 1,139,000 tons in 2019 (EUMOFA, "Species analysis – 2019 edition"). Moreover, it is estimated that the EU fleet only covers 11% of world catches in 2019, and finding new sources of supply is important to ensure security of supply..

09.2770: Anchovies salted or brined

CN Code + TARIC		Anchovies (*Engraulis anchoita*), salted or in brine, but not dried for smoking, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0305 63 00	10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**2,500**		**2,500**	**3,000**	**filleting canning**
Utilisation (%)		**54.2**	**46.0**	**996 (40%)**		

RATIONALE

Increasing this quota is important to guarantee long-term procurement opportunities to EU processors, in case local catches are unavailable(lower TAC or lower catches), which may occur during the triennium. Taking the latest reports from the Spanish Agriculture, Fish and Food ministry (MAPA), the evolution of the *Engraulis encrasicolus*, the main used species, has strong fluctuations like the one which happened in 2016, and also there is a TAC reduction in 2020 for the Biscay Gulf, Zone 8, from 33,000 tons to 31,892 tons. This common pattern of fluctuation was observed at EU level (FAO). Moreover, we have to consider the size of the catches, because some preparations needed bigger sizes that the actual catches at EU coasts.

Experience has shown that ATQ does not create adverse competition to EU fishermen because processors prefer local procurement when it is available.

Finally, we don´t desire to join this item with the frozen anchovies ATQ. There are different industry purposes and needs for each item.

09.2772: Surimi

CN Code + TARIC		Surimi, frozen, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0304 93 10 ex 0304 94 10 ex 0304 95 10 ex 0304 99 10	10 10 10 10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**60.000**		**60.000**	**60.000**	**Ready-to-eat surimi products (surimi seafood, fish sticks,…) ingredient in ready meals**
Utilisation (%)		**75,0**	**84,8**	**50.985t (85%)**		

RATIONALE

Self-sufficiency in surimi base is <10% so we are reliant on imported materials. All the imported product is in a form that requires substantial transformation in the EU before being suitable for consumption.

Historically we have been around 80% utilisation of the ATQ so we believe there is limited room for expansion in demand and would insist that the ATQ at least retains the current 60,000 tonnes level.

09.2774: Hake fillet and meat, frozen

CN Code + TARIC		North Pacific hake (*Merluccius productus*) and Argentine hake (Southwest Atlantic hake) (*Merluccius hubbsi*), frozen fillets and other meat, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0304 74 15 ex 0304 74 19 ex 0304 95 50	10 10 10 20	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**15.000**		**25.000**	**65.000**	**coating battering bread-crumbing ingredient in ready meals cut into portions MAP**
Utilisation (%)		**100% by 18th July**	**100% by 30th July**	**100% by 19th August**		

RATIONALE

We recognize the increase in the last round of ATQs from 20.000 tons to 25.000 tons, however at the same time Merluccius hubbsi was introduced and included within the quota. The total quota was exhausted mid August 2019. The two species/items are in origin, catching season and usage separate and are imported into EU in different product forms (*M. productus* as industrial blocs; *M. hubbsi* as head and gutted, Interleaved (ITL) and individually quickly frozen (IQF). The EU caught hake species (*Merluccius merluccius*) has seen substantial reduction in catching quota in 2020 (minus 20% from 2019) and sold predominantly fresh.

09.2776: Cod fillets

CN Code + TARIC		Cod, (*Gadus morhua, Gadus macrocephalus*), frozen fillets and frozen meat, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0304 71 10 ex 0304 71 90 ex 0304 95 21 ex 0304 95 25	10 10 10 10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**38.000**		**50.000**	**55.000**	**salting cooking coating battering bread-crumbing ready meal ingredient cut into portions MAP**
Utilisation (%)		**100% on 18th Sept**	**100% on 21st December**	**47,211t (94%)**		

RATIONALE

The EU is the largest single market for all species of cod and only around 10 pct. of the cod supply came from EU fisheries. Cod fillets are used for a wide range of added value products across the EU member states and come in several important industrial formats that provide the basic raw material for heavily invested EU processors - the most important of these are industrial blocks and IQF portions ready for coating or as an ingredient in more complex processed products. Most of cod imports consisted of frozen filets (33 pct.) and dried/salted (29 pct.). Our request is to increase the ATQ to 55.000 tons in line with proven market needs.

09.2777: Alaska Pollock, whole, fillets and meat, frozen

CN Code + TARIC		Alaska pollack (*Theragra chalcogramma*), frozen, frozen fillets and other frozen meat, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0303 67 00 ex 0304 75 00 ex 0304 94 90	10 10 10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**300.000**		**320.000**	**370.000**	**filleting salting cooking coating battering bread-crumbing ready meal ingredient cut into portions MAP**
Utilisation (%)		**93,0**	**96,4**	**293,100t (92%)**		

RATIONALE

This item is by far the biggest ATQ by quantity that we have in the EU processing sector. Current usage is >90% of the ATQ. The geographical nature of the species distribution means all product used in the EU is imported. There is a growing market demand especially in Eastern European countries for this specie. Given the absolutely essential nature of Alaska Pollock to the EU processing sector we must retain a sufficiently high volume to avoid the risk of precautionary duty payments being introduced once utilization levels exceed 90%. The quota must be set at a sufficiently high level to avoid any risk of EU processors not having access to this vital raw material.

09.2778: Flatfish fillets and meat

CN Code + TARIC		Flatfish, frozen fillets and other fish meat (*Limanda aspera, Lepidopsetta bilineata, Pleuronectes quadrituberculatus, Limanda ferruginea, Lepidopsetta polyxystra*), for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0304 83 90 ex 0304 99 99	21 65	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**5.000**		**10.000**	**20.000**	**cooking coating battering bread-crumbing ready meal ingredient MAP**
Utilisation (%)		**100% by 25th April**	**100% by 25th September**	**100% by June 25th**		

RATIONALE

This group incorporates a diverse range of species which each have uniquely marketable characteristics. We contend that the impact on EU caught flatfish is negligible. Flatfish quota are highly underused in several species, eg. Plaice. Low flatfish availability negatively affects the industry specializing in flatfish and the flatfish position in the EU market.

The 10,000 tonnes aris exhausted half way the year and this creates a distortion in the market that appears to create more demand than really exists. Our request is to increase levels for this item to 20,000 tonnes. We can find no historical evidence that this level had any impact on the value of any EU caught species and consider the EU processing industry and consumers have been disadvantaged.

09.2785: Frozen Pod of squid, with skin and fins for processing

CN Code + TARIC		Pod (2) of squid (*Ommastrephes spp*. excluding *Todarodes sagittatus* (synonym *Ommastrephes sagittatus*), *Nototodarus spp., Sepioteuthis spp.*) and *Illex spp*., frozen, with skin and fins, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0307 43 91 ex 0307 43 92 ex 0307 43 99	10 10 21	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**40.000**		**28.000**	**28.000**	cleaning filleting cooking
Utilisation (%)		**51,0**	**52,1**	**12.322 (44%)**		

RATIONALE

It is necessary to import 100 % of the raw material for processing as it comes from species that are not captured in the EU (structural shortage). The fact that all the ATQ quotas have not been used up reflects the ongoing fluctuations in fishing quotas that limit the supply and annual planning of processing undertakings. What it does not reflect is the capacity (particularly in Spain) that the industry has to transform these products should raw material become more readily available. (Processing mainly takes place in Galicia and substantial share of the product is then traded within the EU).

As a consequence, we would request maintenance of 28,000 tonnes to be able to take advantage of any increase in supply that could happen in the coming years of the new quota period.

09.2786: Whole, frozen squid for processing

CN Code + TARIC		Squid (*Ommastrephes spp*. excluding *Todarodes sagittatus* (synonym *Ommastrephes sagittatus*), *Nototodarus spp., Sepioteuthis spp.*) and *Illex spp*.,frozen whole or tentacles and fins, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0307 43 91 ex 0307 43 92 ex 0307 43 99	20 20 29	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**1.500**		**5.000**	**10.000**	**canning**
Utilisation (%)		**100% by 9th May**	**100% by 3rd January**	**4.271 (85%)**		

RATIONALE

In the last ATQ round the quota for this item was increased from 1,500 to 5,000 tonnes as the use of this raw material had been increasing. However, taking into account that 100% of the raw material is imported and its availability is mainly conditioned by the fishing quotas and trade preferences of the countries supplying the EU industry, and not necessarily by market demand, we consider that the current quota is clearly insufficient as it is exhausted year after year, with the exception of last year, which as a result of the low catches and the high demand for this product by the Asian side was not exhausted. Historically the ships that fish in Argentine waters have produced pods for the European market, currently they are modifying their way of working and the tendency is to elaborate whole squid to satisfy both markets.

Vessel owners prefer to freeze whole squid as it gives them more options for selling their catch into the global markets - notably China – in competition to Europe. There are not enough first freezing 'dirty squid' so we are obliged to use the whole. The capacity of EU plants is not fully utilized. Innovation in products that allow the use of whole squid is increasing all the time to enable the plants to compete against the other global users such as the Chinese and the prospects for growth are extensive. The industry needs to maintain this competitiveness and we are requesting a more substantial increase to 10,000 tonnes in order to be able to continue unlocking the potential value in transformation of this raw material into marketable products, generating employment and added value.

09.2788: Herrings, pieces and flaps

CN Code + TARIC		Herring (*Clupea harengus, Clupea pallasii*), of a weight exceeding 100g per piece or flaps of a weight exceeding 80g per piece, excluding livers and roes, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0302 41 00 ex 0303 51 00 ex 0304 59 50 ex 0304 99 23	10 10 10 10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**17.500**		**8.000**	**20.000 + 120.000 if no EEA quota from May 2021**	**defrosting heading & gutting fileting spicing marinating canning**
Utilisation (%)		**79,7**	**39,6**	**100% by Dec 15th**		

RATIONALE

This item was exhausted mid December 2019 leaving EU industry without supplies within this end use regime for the rest of the year and until 14.2.2020. The quotas within the EEA (and GATT) regime also covers these CN codes within current quotas, however for fresh, whole herring (0302 41 00) there is a significant short supply until February 14. We would suggest letting this quota cover the full calendar year and thus also to include the full catching season for Atlantoscandic herring. Disallowing import of fresh fish in the catching season from new year until 14 February is an awkward anomaly to be corrected. No other ATQ quota with wild caught fish or crustaceans has any limitation in period attached to it even though they all are subject to seasonality in catch. Also, for this item we risk a sudden discontinuation in supplies if and when negotiation to renew the quotas within the Financial Mechanism EU-Norway does not deliver a result to implement as from May 1st 2021. We propose an automatic increase in this quota with at least 120.000 tons if/when expiring quotas within EEA are not renewed in time. And important note is that when the BREXIT would result in no EU access to UK fishing grounds and no free trade agreement would be reached and ready for implementation as from January 1st 2021 the EU herring industry would be placed in situation of a severe shortage in supply calling for a significant and immediate increase in the ATQ quota. In an additional note we consider this quota to include items which – counted in whole fish equivalents (WFE) – would differ significantly. If the quota was fully exhausted only by import of fillets the WFE would become much higher compared to a situation in which the quota was exhausted only by import of whole fish. We would call for full transparency as to how the quota is used as pr. CN-code because this would reveal important information to operators on how trade and markets work and interplay with the ATQ.

09.2790: Loins and fillets of Tuna

CN Code + TARIC		Fillets known as 'loins' of tunas and skipjack, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 1604 14 26 ex 1604 14 36 ex 1604 14 46	10 10 11 21 92 94	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**25.000**		**30.000**	**55.000 + see footnote***	**canning ready meal ingredient after processing cut into portions**
Utilisation (%)		**100% by 13th February**	**100% by 3rd January**	**100% by 3rd January 2019**		

*Footnote for 09.2790: Only France wishes a quantity of 35.000 tonnes

RATIONALE

With an average annual production of more than 370.000 tonnes, the EU canned tuna industry supplies only 46% of the EU market, with Spain, Italy, Portugal and France as main producers. It provides 20.140 direct jobs in the EU and 60.660 indirect jobs in the supporting sectors. This industry is located in areas highly dependent on fisheries and fish processing. As the recently EUMOFA report exposed, tuna loins have allowed the canning industry to maintain its competitiveness and its activity in the EU, which otherwise would have faced difficulties competing with factories located near the fishing areas So it avoided the risk of a delocalization of production facilities outside EU.

Requests submitted by operators on 1st, 2nd or 3rd of January 2020 were considered - for the purpose of assignment by the Community Services - as accepted on 3rd January 2020. At that date, the requests submitted by operators added up to more than 49,000 tons, with a surplus of more than 19.000 tons compared to the quota (30.000 tonnes) of tuna loins for processing currently established by EU Regulation 2018 / 1977.

So, the quota - as already happened in 2019 – exhausted on the same day of its opening confirming its absolute insufficiency if compared to the EU industry needs. The allocation percentage by the EU Commission was about 61%. This means that no EU operator will be able in 2020 to benefit from the "0" duty foreseen by EU 2018/1977 Regulation, whose applicable remains purely theoretical for our industry.

Autonomous tariff quotas allow producers (tuna purse seiners) to maintain its economic sustainability without damaging their viability. The data extracted from the STECF 2019 Fleet economic performance report, shows a positive growth of the net profit benefit of the long distance tuna-related extractive sector, being more than 23% in Spanish case, while the STECF 2019 processing economic report shows that EU canning industry is suffering, with well-known benefits below 10%, in some cases close to 3%, due to the actual globalization. Moreover, the provisional Spanish volume production of canned tuna has decreased in 2019 compared to 2018, mainly by lack of raw material supply, and being this the first sign of the increasing ATQ urgent need, despite that high-quality strategy of the industry sustained the total value.

The industry don´t understand how the European Commission doesn't take an urgent response. The EU canning tuna market (aprox. 730,000 tons) is only supplied 46% by its industry, whose actual production capacity would allow it to absorb a larger EU market share in case of having a sufficient and competitive supply. Just a reminder, the tuna market is a global one closely related to high seas management, so the EU fleet are working and exporting more than 60% of their catches (EUMOFA 2019 report) in a free market having good revenues and profits. Instead, the EU industry only demands an ATQ of 55,000 tons (less than 10% of the needs of total EU consumption for canned tuna) to survive in the free market mainly because there isn´t raw material availability in traditional sources, while losing opportunities of growing even with more quantity.

The existing EU trade agreements, do not permanently respond to the global competitive framework of the sector. Third countries develop their own canning industry, reducing access to supply, as a country strategy to promote their own GDP growth. Even worse, countries with trade agreements are selling their non originating tuna loins through the ATQ while using the canned products under their originating raw material, by EU fleet supplied in some cases. In addition, we must consider the recent imposition of yellow flags to countries such as Ecuador, Panama or Vietnam, which will entail prohibitions by EU retailers which do not want products of such origins. Complex years will come, despite European processing industries respect EU legislation and go further developing audits on suppliers in order to ensure a responsible supply, they need to continue diversifying the origins in new countries mainly by the intrinsic changes in tuna agreements, catches, etc. paying high taxes harming their economic viability and future. Something easy to understand is, that if the EU processing industry is forced to close, the EU fleet will have less demand from EU side being a contradiction with the hypothetical producers' interests.

Another countries, like the PNA (Parties of the Nauru Agreement) of the Western Pacific, in whose waters 50% of the world catches are captured, link the access to fleet licenses to the download of the tuna in the area to its transformation therein. And, for non-originating quotas like Mauritius, Madagascar or Seychelles, we observe their low use by the country strategy. As an example, in 2019 the non-originating quota of tuna loins was used only in 10% for them, while the one for canned tuna was used in 40%.

As showed, tuna is a limited global resource for which everyone competes, including new actors for the growing demand of frozen tuna intended for direct consumption (sushi, for example). So, if EU producers operate in a global world, selling everywhere with good net profits, the EU industry equally needs to access to new suppliers in order to sustain their activity in EU territory as a guarantee also, to sustain the EU relevance and to help the EC to impose better global standards in fisheries policies.

There are two clear facts about this ATQ: there is a need of urgently increasing it because the EU catches and trade agreements can´t supply the processing needs; and there are not EU producer damage in their economic sustainability, STECF 2019 fleet economic report, by this ATQ. So, the EC have the chance to solve the supply risk.

09.2794: Borealis Shrimp cooked and peeled for processing

CN Code + TARIC		Shrimps and prawns of the species *Pandalus borealis* and *Pandalus montagui*, cooked and peeled, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 1605 21 90 ex 1605 29 00	45 62 50 55	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**30.000**		**7.000**	**7.000**	**MAP brining marinating ready meal ingredient**
Utilisation (%)		**49.3**	**85.0**	**3,549t (51%)**		

RATIONALE

7.000 tons proved sufficient to cover import in 2019, however the longer term trend is difficult to predict post CETA. Other 3rd countries than Canada could increase production and export to the EU. We recommend allowing room for an increase and to keep the quota on 7.000 tons.

09.2798: Shrimps in shell (Pandalus borealis)

CN Code + TARIC		Shrimps and prawns of the species *Pandalus borealis*, in shells, fresh, chilled or frozen for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0306 16 99 ex 0306 35 90	20 30 12 14 92 93	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**10.000**		**4.000**	**4.000**	**cooking deshelling hand peeling marinating MAP ready meal ingredient**
Utilisation (%)		**40.6**	**19.0**	**641t (16%)**		

RATIONALE

EU is heavily dependent on imports of shrimp and self-sufficiency was 1 pct. (AIPCE Finfish study 2019). Total quota was reduced due to the introduction of CETA. We request maintenance of the current limit to allow for further growth in the next ATQ cycle.

09.2800: Pandalus jordani, cooked, peeled

CN Code + TARIC		Shrimps and prawns of the species *Pandalus jordani*, cooked and peeled, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 1605 21 90 ex 1605 29 00	55 60	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**3,500**		**3.000**	**3.000**	**MAP brining marinating ready meal ingredient**
Utilisation (%)		**100% by November 29th**	**60.0**	**1.538t (51%)**		

RATIONALE

Jordani has over years proven attractive for the EU market in the form of MAP and brined products (however also as a valued ingredient in salads). Compared to its closest substitute Pandalus borealis it has a slightly different texture, smaller size and a slightly sweeter taste and is now established and appreciated in the EU coldwater prawn market. US landings and production of cooked/peeled and single frozen Jordani is expected to be steady in 2020 compared to earlier year. The total stock and catching of Pandalus Borealis has been decreasing for years while flattening out in the last 2 years which also has contributed to more interest and attention on Jordani. The quota was slightly reduced in the last round from 3.500 to 3.000, while EU industry did not exhaust the quota in 2018. As the catching quota for Pandalus borealis is still not in a clear positive trend and the EU market has turned familiar with Jordani we feel fully justified to request a steady quota of 3.000 tons.

09.2802: Shrimp vannamei for processing

CN Code + TARIC		Shrimps and prawns of the species *Penaeus vannamei* and *Penaeus monodon*, whether in shell or not, fresh, chilled or frozen, not cooked, for processing			2021-2023 REQUEST (t)	Type of processing operation
Ex 0306 17 92 Ex 0306 36 90	20 30	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**40.000**	**30.000**	**40.000**	**75.000***	**cooking marinating MAP ready meal ingredient**
Utilisation (%)		**100% by December**	**100% by 21st September**	**100% by October 31st**		

*Footnote for 09.2802: Spain (Conxemar) requests to open this item to all Penaeus family.

RATIONALE

This raw material cannot be found inside EU as there are no producers (except tiny operations of an experimental nature).
The current quota is exhausted by 31st of October 2019 and is proven to be insufficient. We are very mindful of the need to meet the requirements of the qualifying processes defined in the footnotes of the regulation. In keeping with this we estimate that at least 100,000 tonnes of Warmwater prawns meet these requirements, most especially for cooking. (As an example we know of at least 23 companies that are active in the processing of prawns in Spain accounting for 45,000 tonnes alone, and 10 cooking establishments for 52.000 tonnes in France only).

The production of cultivated Warmwater prawns is subject to much fluctuation due to external factors such as disease and weather and it unsafe to assume long term stability in the supply from any one country or region. As almost 100% of the product needs to be imported we consider the limit should be increased to reflect the appetite for the species and the consideration that there is proven added, employment and market needs. We also challenge that adjustment for FTAs is valid due to the potential disruption to supply previously described.

Additionally we are concerned that the exit of Argentina, China and Thailand from the GSP with no bilateral agreement in force means that the duties will be increased substantially on large parts of the supply.
Finally processed products of the heading 1605 enter the European market from the countries of the Andean Pact or from Central America at 0% and it therefore it

09.2824: H&G frozen Haddock

CN Code + TARIC		Haddock (*Melanogrammus aeglefinus*), fresh, chilled or frozen with heads off, gilled and gutted, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0302 52 00 ex 0303 64 00	10 10	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**5.000**		**3.500**	**5.000 at 0%**	**filleting**
Utilisation (%)		**52,0**	**81,5**	**2.540t (73%)**		

RATIONALE

This item was re-introduced in the current ATQ round. Like Cod under order 09 2759 the conversion of this raw material into consumer products adds considerable economic activity in the EU where it is used.
The EU is only 25% self-sufficient in this species and does not provide enough supply to sustain viable operations nor the consistency of supply reliable due to seasonality. Additionally the market for locally landed EU caught haddock tends towards fresh chilled operations and smoked products where the fact the fish is fresh provides an advantage.
The added value processing sector (eg coated products, ready meals etc) has for many years been limited in its scope to source from this material due to the restricted local supply and the relative unsuitability of EU fish because of small fillet size. Consequently much of the raw material used by the producers of consumer added value products, typically frozen, relies on imported raw materials, as IQF fillets and blocks from outside of the EU.
Our request here is for H&G which facilitates the production of these items in the EU more competitively and the reduction of the 2.6% duty to ZERO.
Neither does our submission address the full market needs as it only offers a partial solution but we feel is important to establish the potential for providing greater economic return in the EU.
We are request to increase to 5,000 tonnes and suggest to reduce the duty from 2.6% to 0%.

09.2826: Shrimps *muelleri*

CN Code + TARIC		Shrimps and prawns of the species *Pleoticus muelleri*, whether in shell or not, fresh, chilled or frozen, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0306 17 99 ex 0306 36 19	10 20	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		**10.000**		**4.000**	**10.000 + see footnote***	**peeling marinating MAP ready meal ingredient**
Utilisation (%)		**22,4**	**43,5**	**100% by April 17th**		

*Footnote for 09.2826: Spain (Conxemar) requests for an increase to 50.000t.

RATIONALE

This product accounts for an important part in the EU shrimp sector, with particular relevance in Spain which, with 2.5% and 18.2% consumption of the quota in 2016 and 2017, is the main country using it. The use of this quota was low as a result of the misinterpretation of the Regulation. Having clarified this interpretation and proceeding from a position of wider possibilities of processing and/or transformation of this quota, as expected the use of this quota has been substantially increased at the level of the Spanish industry and, at EU level accordingly. This is evidenced by the fact that, as of 17 April 2019, 100% of the quota had been exhausted.

We must also take into account the increase in catches, in 2014 the total catch was 129,103 and in just 4 years (2018) the total catch was 253,255.
Currently in addition to peeling, the whole shrimp is also being treated with gas. It is therefore possible that next year the situation will be similar to that of tuna and the quota will therefore be exhausted in the first few months of the year.
Because of these considerations, we propose an increase in the quota to 10,000t.

09.2804: Crayfish tails

CN Code + TARIC		Crayfish tails of the species *Procambarus clarkii*, cooked, for processing	2021-2023 REQUEST (t)	Type of processing operation
ex 1605 40 00	40	**Current cycle 2019**		
Annual Allowance		**4.000**	**4.000**	**MAP brining ready meal ingredient**
Utilisation (%)		**1,286 (32%)**		

RATIONALE

The quota proved sufficient to cover import in 2019, however we would request to include Modified Atmosphere Packing as a qualifying process by which the need for end use import of this would increase to cover this value adding process. We therefore request to keep the current amount in the next round.

09.2762: Rock Lobster

CN Code + TARIC		Rock lobster and other sea crawfish (*Palinurus spp., Panulirus spp., Jasus spp.*), live, chilled, frozen, for processing	2021-2023 REQUEST (t)	Type of processing operation
ex 0306 11 10 ex 0306 11 90 ex 0306 31 00	10 20 10	**Current cycle 2019**		
Annual Allowance		**200**	**400 at 0%**	**dicing slicing dividing ready meal ingredient**
Utilisation (%)		**61t (31%)**		

RATIONALE

This quota was reinstalled in 2019. The companies had to reinstate the customs authorizations for particular destinations, which with the new procedures of the CCC proved to be long; consequently, the quota was consumed only at the end of 2019. There is a demand for this raw material and we can estimate that by 2023 the use will approach 400 T. In addition, this material is expensive, and it is important to lower the duty to 0% instead of 6%.

09.2784: Crabs

CN Code + TARIC		Crabs of the species 'King' (*Paralithodes Camchaticus*), 'Hansaki' (*Paralithodes brevipes*), 'Kegani' (*Erimacrus isenbecki*), 'Queen' and 'Snow' (*Chionoecetes spp.*), 'Red' (*Geryon quinquedens*), 'Rough stone' (*Neolithodes asperrimus*), *Lithodes santolla*, 'Mud' (*Scylla serrata*), 'Blue' (*Portunus spp.*), simply boiled in water and shelled, whether or not frozen, in immediate packings of a net content of 2 kg or more, for processing	2021-2023 REQUEST (t)	Type of processing operation
ex 1605 10 00	21 95	**Current cycle** **2019**		
Annual Allowance		**500**	**500**	**canning** **ready meal ingredient**
Utilisation (%)		**0 (0%)**		

RATIONALE

The ATQ is not used so far because of availability (the quota has been reduced significatively) and the price (the US demand makes the prices high).
But we would ask to keep this line in case the situation becomes more favorable for the EU market.

09.2822: Pacific Salmon

CN Code + TARIC		Pacific Salmon, headed and gutted, frozen and fillets frozen, of the species *Oncorhynchus nerka* (sockeye salmon (red salmon)) and *Oncorhynchus kisutch*, *Onchorhynchus keta* and *Onchorhynchus. tshawytscha* for processing	2021-2023 REQUEST (t)	Type of processing operation
ex 0303 11 00 ex 0303 12 00 ex 0304 81 00	20 20 90	**Current cycle 2019**		
Annual Allowance		**10.000**	**20.000**	**smoking ready meal ingredient**
Utilisation (%)		**1,305t (13%)**		

RATIONALE

The quota is under used so far because of seasonality (they are caught mainly between October and April) and also because it took a lot of time for the importers to be in accordance with the new end-use and TORO procedures. But they are needed to be smoked in the EU countries.
Moreover we ask for the addition of *Onchorhynchus keta* and *Onchorhynchus tshawytscha* in this ATQ and to include the fillets, because the final end use (smoking) is the same.

B. New species

NEW SPECIES: White ling, whole frozen (New species)

CN Code + TARIC		White ling (*Molva molva*), whole frozen			2021-2023 REQUEST (t)	Type of processing operation
ex 0303 69 80	XX	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		-		-	**1.500 at 0%**	**filleting salting**
Utilisation (%)		-	-	-		

RATIONALE

Traditionally salted products such as bachalao as well as wet salted products are based on cod. Use of white ling has proven itself as a qualified alternative not only a substitute but a real alternative with distinct quality and easy to treat and process. As EU stocks of cod have decreased significantly other species such as white ling has attained attention by producers of salted products based on white fish. The current duty is 7.5%. We request 0%.

NEW SPECIES: Flatfish whole and H&G

CN Code + TARIC		Flatfish, whole and Headed & Gutted (*Limanda aspera, Lepidopsetta bilineata, Pleuronectes quadrituberculatus, Limanda ferruginea, Lepidopsetta polyxystra*), for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0303 39 85	XX	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		-		-	**20.000 at 0%**	**Filleting coating battering bread-crumbing ready meal ingredient**
Utilisation (%)		-	-	-		

RATIONALE

This group incorporates a diverse range of species which each have uniquely marketable characteristics. We contend that the impact on EU caught flatfish is negligible. Flatfish quota are highly underused in several species, eg. Plaice. Low flatfish availability negatively affects the industry specialized in flatfish and the flatfish position in the EU market.

The sharp reduction of EU flatfish production in recent years has a negative impact on the solvency of flatfish processing companies. We would like to see a new quota of 20,000 tonnes whole flatfish introduced to improve the solvency of these flatfish processing industry. As mentioned in quota 09.2778 we can find no historical evidence that this level had any impact on the value of any EU caught species and consider the EU industry and consumer have been disadvantaged.

New SPECIES: Southern blue Whiting, filets, frozen

CN Code + TARIC		Southern Blue Whiting, *Micromesistius australis*, frozen fillets and other meat, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0304 89 90	xx	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		-		-	**3000 at 0%**	**defrosting cooking ready meal ingredient MAP**
Utilisation (%)		-	-	-		

RATIONALE

Fillets and blocks from this white fish species are requested by EU industry, however a current 15% duty is currently rendering this species non-competitive as input in the processing industry. The species will be caught sustainable and processed (outside the EU) for filet and mince. On the basis of these convenience products would be produced in the EU. Southern blue Whiting (SBW) thus would contribute to a bigger variety in convenience products to competitive prices. Cod is already used for that purpose, but SBW would supplement because the catch season is August-October. Introducing new species/products on the EU market are costly affairs and at the current duty rate of 15% the final product is not competitive at the EU market. An ATQ could change that and allow for introduction of these products on the EU market

NEW SPECIES: Whole (back) fillet and meat of Dogfish (*Squalus acanthias*), frozen

CN Code + TARIC		Whole Dogfish (back), frozen Fillet of Dogfish (belly flaps), frozen Meat of Dogfish (belly flaps), frozen, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0303 81 15 ex 0304 88 11 ex 0304 96 10	xx xx xx	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		-		-	**2.000 at 0%**	**smoking ready meal ingredient**
Utilisation (%)		-	-	-		

RATIONALE

The back and belly flaps are used to process traditionally smoked products called “Schillerlocke” (flaps) and “Seeaal” (backs) in Germany. The Dogfish comes from sustainable sourced fisheries in the USA. The fisheries are MSC-certified. There is no competition with EU-fishermen because the target catch of this species is not allowed in EU-waters. The EU-duty is 7,5% (belly flaps) and 6% (back) at this moment.

NEW SPECIES: Haddock fillets, frozen

CN Code + TARIC		Haddock fillets, frozen			2021-2023 REQUEST (t)	Type of processing operation
ex 0304 72 00	xx	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		-		-	**5.000 at 0%**	**coating battering bread-crumbing ready meal ingredient**
Utilisation (%)		-	-	-		

RATIONALE

Haddock is very popular with consumers in some member states and there is strong market demand for processed haddock products. Although the EU haddock fishery is important to EU fleets, particularly in Scotland, England and Ireland, the total amount of fish caught by the EU only represents around 20% self-sufficiency and does not provide enough volume to meet consumer demand. Seasonality also means that supply is inconsistent.

The market for locally landed haddock is principally for fresh chilled operations and smoked products where the fact the fish is fresh provides a market advantage and for which consumers will pay a price premium. Nor does the EU have facilities to produce the fillets and blocks which are the raw material for processors to make the products for the final consumer.

The added value processing sector (eg coated products, ready meals etc) has for many years been limited in its scope to source this material locally due to the restricted local supply and the relative unsuitability of EU fish because of small fillet size. Consequently much of the raw material used by the producers of consumer added value products, especially frozen, import their raw materials as frozen fillets and blocks from outside of the EU.

Our request is based on industry estimates of the needs for this format. Annual imports into the EU are around 7,400 tonnes but some of this would is not used for qualifying processes under the ATQ regime. The 5,000 tonnes requested represent the best industry estimate of processors' needs for the manufacture of eligible products.

NEW SPECIES: Japanese Flying Squid, frozen

CN Code + TARIC		Todarodes pacificus (in rings for cooking and selling to retailers on their own or in a seafood selection mix)			2021-2023 REQUEST (t)	Type of processing operation
ex 0307 43 99	xx	**2017**	**2018**	**Current cycle 2019**		
Annual Allowance		-		-	**10.000 at 0%**	**cooking**
Utilisation (%)		-	-	-		

RATIONALE

Squid has been extremely expensive over the last couple of years since the move to more responsible sources (away from India). Japanese flying squid is a more viable source, however it still attracts 11% duty despite there being no European alternative. We believe that there is a significant potential market for this product and it will provide processors with a cost effective and sustainable supply of raw material.

NEW SPECIES: Herrings, preserved, in brine (09.2792 of regulation No. 2015/2265)

CN Code + TARIC		Herrings, spiced and/or vinegar-cured, in brine, preserved in barrels of at least 70 kg net drained weight, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 1604 12 99	11			**Current cycle 2019**		
Annual Allowance				**No ATQ in current cycle as Norwegian Compensation agreement 0% duty**	**17.100 at 0% as from May 1st 2021 and until Norway order No 09.0750 would be prolonged and applicable with the equivalent tonnes.**	**Consumer ready products in cans and glass with variety of herbs. spices, etc.**
Utilisation (%)				**-**		

RATIONALE

Within the current round of ATQ's 2019-2020 the former quota from 2016-2018 was not extended, because the quota within the EEA regime were deemed and indeed proved sufficient to cover the EU industry's need for duty-free supply. Within the current round of the Financial Mechanism agreed between Norway and EU a yearly amount of 17.100 tons (09.0750) was allocated for this purpose. The negotiations within the last round of the Financial Mechanism resulted in a renewal of the current quota 09.0750 2 year delayed leaving a period in which EU industry could not import this item without duty (20 pc.t). The current agreement for spiced herring EU-Norway (09.0750) expires 30 April 2021. Based on historic experience there is a real risk for a delay (or even a discontinuation) leaving EU industry without duty free access to this semi-processed valuable input. We propose therefore the equivalent end use quota of 17.100 tonnes to apply as safeguard to be introduced if (and when) the renewal of the current EEA quota is ready for application on May 1st, 2021 and in place for the full ATQ period. The utilization of the quota nr. 09.0750 shows an increase as some member states have increased their usage of the quota which is positive for the seafood industry and consumption of herring in EU. As the quota utilization is expected to grow also in the coming years an ATQ of the equivalent of the EEA quota of 17.100 tonnes is an absolute minimum for the coming quota period. The amounts under the quota should be measured in drained weight also in the future as this is how it is done today.

NEW SPECIES: H & G Atlantic salmon (*Salmo salar*), fresh

CN Code + TARIC		Atlantic salmon (Salmo salar) fresh, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 0302 14 00	10			**Current cycle 2019**		
Annual Allowance				-	80.000 at 0%	fileting smoking marinating
Utilisation (%)				-		

RATIONALE

Farmed salmon - especially of Norwegian origin - is a major source for fileting, smoking and marinating in the EU processing industry almost doubling its import (by weight) during the last 10 years. The tariff duty rate is low at 2% change. while at the same time the value has doubled per kilogram. The duty is thus high in nominal value and the unit price has remained high for years. An ATQ of 80.000 tonnes should be introduced for fresh Head and Gutted salmon of the species *Salmo salar*.

NEW SPECIES: Chilean Jack Mackerel H&G, Whole

CN Code + TARIC		Chilean Jack Mackerel H&G, (Trachurus murphyi), whole, for processing			2021-2023 REQUEST (t)	Type of processing operation
ex 03035530	10			Current cycle 2019		
Annual Allowance				-	1,000 at 0%	smoking
Utilisation (%)				-		

RATIONALE

For smoking. Traditional technology & sector with a great share in the market. Growing demand, another possibility for the industry to exist, develop and to increase the supply of high value wild fish protein in the Central and East EU Member states where the price for the final product is the crucial factor. North European (EU) consumers are traditional consumers of the smoked pelagic species. Jack mackerel appears the growing alternative for other North Atlantic pelagic species supplied as smoked. Almost all of the EU fleet catches of the JM are not supplied to the EU.

C. Recommendation for amending article 4 of the current ATQ regulation 2018/1977

We recommend to include Modified Atmosphere Packaging (MAP) for all ATQs where MAP is mentioned. Below you will find our rationale for the extension of MAP as qualifying process for the revised ATQ system 2021-2023.

Commercial explanation

In the current ATQ regime Regulation 2018/1977 for the 2019-2020 period, Modified Atmosphere Packing (MAP) packaging meets the requirements for a qualifying process for shrimps of the species *Pandalus borealis, Pandalus montagui, Pandalus jordani, Penaeus vannamei, Panaeus monodon* and *Pleoticus muelleri* (see Article 4.4 of the Regulation). Shrimps are indeed major products for the MAP application used in the final sales format to consumers.

This technique has resulted in very positive economic effects in terms of market growth and logistics as it has to be conducted locally to the individual market. Significant growth in the EU consumer market for MAP packed products is being experienced, and it is now widely extending to other seafood species such as cod, hake and salmon and is a primary driver of the market volume growth of such species. This growth is being fueled by an ever increasing appetite for seafood and fish products sold in the chilled state and this rapid transformation of both the retail and food service markets is providing exciting new opportunities in many member states that today only have a minor share of chilled products. Indeed in markets where this format has been used for some time sales of chilled seafood often exceed those of frozen products and have resulted in the positive effect of increasing the overall consumption of seafood in the consumer diet.

Given the precise and sensitive nature of the gas mixture used per fish species, packaging with MAP requires advanced technologies and heavy investment for EU companies. It is therefore a sophisticated industrial process which unlike simpler forms of repackaging creates significant labour opportunities and added value. Extending the qualifying process in the way suggested will provide strong incentives to keep processing, packaging and distribution of fish within the EU market. Typically the final preparation is done in the local market to maximize the benefit of shelf-life and presentation.

MAP plays an important role in reducing waste throughout the supply chain and the prolonged shelf life of products has contributed to the technique's immense success and particular proliferation in retail services. Retailers are the largest distributors of fresh & chilled seafood to consumers in terms of volumes and value, and their market share is growing.

Technical rationale

Modified Atmosphere Packaging is the technological practice of modifying the composition of a food package's internal atmosphere with a protective gas mix in order to extend the shelf life. MAP is

a packaging technique used to extend the shelf life of fresh and chilled food products. The technology substitutes the atmospheric air inside a package with a specially formulated protective gas mix. The gas in the package helps increase the period in which the product stays fresh, retains its appealing and positive characteristics and of course keeps safe.

The nature of fish products ensures a rapid deterioration by microorganisms causing fish products to be particularly vulnerable to spoilage and waste. Whilst the key to keeping fish as fresh as long as possible is to maintain a low temperature – as close to 0˚C as possible - extending the shelf life of fresh fish and seafood is a particular challenge because of the unique nature of the product, and because there are many types of fish that have different characteristics and therefore different requirements for packaging.

An appropriate mixture of gases in the modified atmosphere packaging for raw fish is effective in inhibiting the growth of common microbes. Seafood packaged under modified atmosphere, and under the correct conditions of refrigeration, significantly increases the shelf life as microorganisms are deprived of favorable conditions. The increase of the shelf life in such delicate product as seafood can also be achieved through a process combining industrial de-freezing under controlled conditions and packaging under modified atmosphere.

source: http://www.modifiedatmospherepackaging.com/

Request

Considering this developing market trend, the EU fish processing industry considers the use of MAP as a qualifying process in more general terms, and for the revision of the ATQ system for 2021-2023, we request the extension of the MAP preparation in the EU for sale in chilled consumer formats as qualifying process for the following species:

Order No	Description
09 2804	Crayfish
09 2776	Cod fillets
09 2774	Hake fillets and meat
09 2761	Hoki fillets
09 2777	Alaska pollack fillets
09 2778	Flatfish fillets
NEW	Southern Blue Whiting