

Advice

Integration of sustainability criteria under the regime of Autonomous Tariff Quotas for certain fishery products

Brussels, 28 April 2025

1. Background

Among the different regimes implemented by the EU to facilitate the access of its industry to external raw and semi-processed materials, the Autonomous tariff quotas (ATQs) allow for the reduction of custom duties on limited import quantities of selected products. The aim is to facilitate access for the EU processing industry to raw materials not available in the EU in sufficient quantities and/or at competitive prices. Through the mentioned reduction of custom duties, there is a lowering of the purchase cost of these materials. ATQs are applied in various sectors, and the fisheries and aquaculture sectors have a specific regime.

In the fisheries and aquaculture sector, ATQs are usually provided for periods of three years. The current ATQs are provided under Council Regulation 2023/2720 for the 2024-2026 period¹, opening 31 quotas for unprocessed and semi-processed fisheries and aquaculture products needed for the EU's food processing sector. For most products, the residual *ad valorem* duty is set at zero per cent.

These tariff quotas apply on a first-come first-served basis for specific quantities of fisheries or aquaculture products, with a mandatory end use condition "processing in the EU".

¹ [Council Regulation \(EU\) 2023/2720 of 27 November 2023 opening and providing for the management of the Union autonomous tariff quotas for certain fishery products for the 2024–2026 period](#)

2. Evaluation and impact assessment

The European Commission is considering adjusting the scope of the ATQ regime after 2026 to tackle the sustainability of imported fishery products (e.g., management of fish stocks, social and trade matters, competitiveness of the EU fishing sector). The way to achieve this objective has not been decided yet.

The Commission launched a call for evidence from 7 October to 4 November 2024². An impact assessment of the environmental, social and economic consequences of a potential review to introduce sustainability criteria will be conducted by the Commission. The call for evidence lists three possible policy options:

- 1) Baseline scenario – Continue the current ATQ regime in an unchanged form. Under this scenario, the ATQs defined in Regulation 2023/2720 (where the utilisation of ATQs is not contingent upon any sustainability conditions), are extended beyond 2026;
- 2) No ATQs scenario – Under this scenario, the ATQ import regime would end when the period covered by the current ATQ Regulation expires. As of 2027, any imports of products covered currently by the ATQ Regulation originating in countries that have no free trade agreement with the EU or do not benefit from the general system of preferences (GSP) would be subject to most favoured nation duties under the GATT agreement;
- 3) New ATQ scheme with sustainability criteria – The exact nature of any new sustainability criteria (in the form of conditions) would be developed in more detail in the impact assessment and the public consultation process. DG MARE will explore various options, including making the import of fishery products under the ATQ regime conditional on the

² https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14358-Sustainable-imports-of-fishery-products-under-the-EU-Autonomous-Tariff-Quota-Regulation_en

ratification of several environmental and/or labour conventions that underpin the functioning of the free trade agreement and GSP schemes. Any changes made in the ATQ instrument must be compliant with the EU's WTO/GATT obligations.

Under the mentioned call for evidence, it is explained that “the impact assessment will be conducted in parallel with a retrospective evaluation of the current and previous ATQ Regulations, given that they never had sustainability criteria. This will enable the Commission to assess whether and how the current ATQ import regime currently fosters sustainability and whether improvements are needed. This analysis will help shape the reflection on the possible review of the ATQ Regulation. The retrospective evaluation will cover the current and previous (2020/1706) ATQ Regulations from 2021 to end 2024. Both the impact assessment and the evaluation study will be informed by a study carried out by an independent consultant in 2022, potentially accompanied by an additional complementary study and by an updated EUMOFA study on the value added created by the ATQ”.

According to a 2015 study conducted by external consultants evaluating the Regulation n.º 1220/2012, “the ATQ instrument does not have any detectable negative impacts on the EU production sector. Proceeding on a quota basis limits possible negative spillovers on sensitive fish species for which some supply is available from EU producers like tuna, cod, herring or flatfish”³. As Regulation n.º 1220/2012 refers to a previous iteration of the ATQs regime, when compared to the Regulation presently in effect, the volumes and species covered have evolved. In the same study, concerning fisheries stakeholders, the consultants also stated that “according to the stakeholder associations met, the most sensitive topics are related to tuna, hake, squid and flatfish. Some associations on the production side consider that there is enough offer on the market for these species to guarantee the supply of the processing industry in terms of quantity,

³ [Study on the possibility to ensure a smarter supply policy for the processing industry and evaluation of the EU regulation n° 1220/2012](#)

quality and price, and that tariff quotas have a depressive impact on prices. The analysis of first sale price data does not allow this to be confirmed”.

The conclusions of the study carried out by an independent consultant in 2022 are not publicly available. The abovementioned potential complementary study and the updated EUMOFA study on the value added created by the ATQ might come to different findings than the 2012 study. In the view of the MAC, the European Commission should proceed with the complementary study and with the updated EUMOFA study.

3. Recent evolution of the regime

The current Regulation on ATQs⁴ grants reduced duty access up to a yearly maximum of 903,600 tonnes of imported fishery and aquaculture products for 2024, 2025, and 2026, out of which 888,600 tonnes with zero duty, and 15,000 tonnes with reduced duty at 5% or 7.5%. Out of the total amount, the largest quotas in volume are for whitefish, while the highest duty reductions are for semi-processed products⁵.

The above figures do not account for other bilateral agreements and concessions granted by the EU to third countries, such as those under the 2021-2028 Financial Mechanism of the European Economic Area or under free trade arrangements. In 1992, 42,000 tonnes of fishery and aquaculture products could benefit from tariff reductions (not derogations), but, during that period, there were also several fishery and aquaculture products that benefited from access under “tariff suspensions” without quantitative limit.

⁴ [Council Regulation \(EU\) 2023/2720 of 27 November 2023 opening and providing for the management of the Union autonomous tariff quotas for certain fishery products for the 2024–2026 period](#)

⁵ Precooked, frozen tuna loins: from 24 % most-favoured-nation duty to 0 % quoted duty

According to data extracted from the database of DG TAXUD and processed by Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V., over the last years, the utilisation rate of the tariff quotas was as below:

Year	2021	2022	2023	2024
Quota utilisation rate	63 %	62 %	72 %	45 %

4. Previous advice

Under a previous advice on “Level Playing Field”⁶, the MAC included references to the ATQ regime, including:

“Where considered necessary, the EU also adopts tariff free provisions for certain fishery products for a certain period of time. An example is the Regulation setting autonomous tariff quotas (ATQ) for certain fishery products for the period 2019-20212. It covers 28 product categories among which pelagic fish (frozen or salted anchovies, semi-processed or frozen tuna), various white fish species (Cod, Hake, Alaska pollock, flatfish...), crustaceans and molluscs, for which specific volumes can be imported from non-EU / non-preferential countries at a reduced or zero-duty tariff. Raw materials benefiting from this scheme can enter the EU market without prejudice to other legislation covering indication of origin, information to consumers, way of production, sustainability of the stock, labour standards, or catch certificate scheme under the EU legislation for illegal, unreported and unregulated (IUU) fishing. These products are solely imported for further processing in the EU through a strict end use control system by national customs authorities and Taxud”.

Among other recommendations, under the mentioned advice, the MAC recommended that:

⁶ [MAC Advice on “Level Playing Field \(LPF\) \(2019\)](#)

“The MAC also strongly recommends that countries which are linked to IUU fishing and serious labour abuses shall not benefit from preferential market access; rather the opposite. The EU should work towards achieving a true level playing field between EU produced and third country produced seafood”.

“The ATQ instrument must be solely used when there is not sufficient seafood supply for our markets and cannot be intended to import non-sustainable products nor put pressure on EU producers’ prices”.

5. Environmental aspects

5.1. Illegal, Unreported and Unregulated (IUU) Regulation

The IUU Regulation⁷ aims to prevent the entrance of Illegal, Unreported, and Unregulated (IUU) fishing products into the EU market. The regulation allows the European Commission to assess the compliance of third countries with regulations against IUU fishing. If the country fails to address its compliance issues, the European Commission issues a pre-identification (“yellow card”). If the country maintains the lack of compliance, the European Commission will proceed with a formal identification as a non-cooperating country (“red card”), and the Council will add it to the list of such countries it maintains (“listing”). Consequently, the fishery products caught by vessels flying that country’s flag will be banned from the EU market.

5.2. Risk of sourcing from countries with less stringent fisheries management

The ATQ regime has an *erga omnes* effect. The regime does not include specific provisions on the sourcing from countries that are subject to import restrictions under Regulation 1026/2012, from countries that have not ratified the main international agreements on fisheries management,

⁷ [Council Regulation \(EC\) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing](#)

such as the United Nations Convention on the Law of the Sea, the United Nations Fish Stocks Agreement, and the FAO Compliance Agreement, and from countries that are not part of the relevant Regional Fisheries Management Organisations, even if there is substantiated evidence of unsustainable environmental practices.

Regarding the scope and subject matter of Regulation 1026/2012, it is important to recall that, in accordance with Article 2, “the measures adopted pursuant to this Regulation may apply in all cases where cooperation between third countries and the Union is required for the joint management of the stocks of common interest, including where that cooperation takes place in the context of an RFMO or a similar body”.

6. Economic aspects

6.1. Level-playing-field⁸

According to paragraph g) of point 5 of Article 2 (“objectives”) of the CFP Regulation, the CFP shall “contribute to an efficient and transparent internal market for fisheries and aquaculture products and contribute to ensuring a level–playing field for fisheries and aquaculture products marketed in the Union”.

Businesses based in the EU, from the entire supply chain, are required to meet high social, economic and environmental standards. Therefore, the European Commission should apply similar standards for all imports while considering the profitability and competitiveness of the entire EU fishery and aquaculture value chain. In accordance with Recital (1) of the current Regulation on ATQs, “to ensure fair competition between imported fishery products and Union fishery products on the Union market, the impact of the measures on the competitiveness of Union fish producers should also be taken into consideration”.

⁸ [MAC Advice on “Level-Playing-Field” \(30 September 2019\)](#)

The potential introduction of sustainability conditions under the ATQs regime must be coherent with other EU trade and sustainability instruments⁹.

Furthermore, at the international level, including through trade instruments and in the fora of RFMOs, the Commission should continue promoting the adoption of similarly ambitious environmental and social standards by third countries. This could also include reinforcement of auditing efforts, while also establishing new mechanisms, with the due technical and human resources, to ensure more efficient and effective controls in third countries to avoid unfair competition in the EU market.

6.2. Added value for the EU processing industry

The ATQ regime facilitates the EU processing industry's access to raw materials through the exemption or reduction of duties, which lowers the purchase cost. The regime is meant to facilitate access to materials that are not available or are available in insufficient quantities through the EU primary production or the existing free trade agreements. This allows the industry to meet market demands and seasonal variations, providing for more economic stability for the EU processing industry. As a counterpart, the regime obliges that the imported material must be transformed in the EU territory, generating added value in EU territories (mandatory "end-use" condition).

6.3. Administrative burden

Potential amendments to the framework should consider the administrative requirements for EU operators and public administrations. In this context, it is important to keep in mind that the majority of companies in the EU importing and processing sectors are SMEs. It is important to

⁹ https://policy.trade.ec.europa.eu/development-and-sustainability/sustainable-development/sustainable-development-eu-trade-agreements_en

also consider the increase in requirements and guaranties derived from the recently adopted Corporate Sustainability Reporting Directive and the Corporate Sustainability Due Diligence Directive as well as from Regulation (EU) 2024/3015 on prohibiting products made with forced labour on the Union market.

6.4. Competitiveness of the EU processing industry

According to the latest edition of the STECF annual economic report on the EU fish processing sector¹⁰, the EU processing industry's total income, including turnover and other incomes, amounted to € 30.6 billion in 2021, a slight increase compared to 2020 (+5%) and 2019 (+4%).

The viability of the EU processing industry, including employment and trade opportunities, depends on a reliable supply of raw materials. These materials constitute over 70% of the industry's production costs. The economic access to raw materials is key to the competitiveness of the EU industry and help it to fight against inflation, especially in periods of high prices, as it has been described in the 2023 edition of "The EU Fish Market" report of EUMOFA¹¹.

A skills gap often hinders innovation and productivity. While investments in skills, digitalisation, and innovation are vital for the future of the industry, they require business stability and confidence.

Harmonisation of global standards, a prerequisite for a level-playing-field, depends on enhanced cooperation with third countries where regulatory frameworks and standards are less advanced, to facilitate convergence.

Efforts to reach higher sustainability requirements for the production from third countries could bring significant benefits to the competitiveness of the EU fisheries, aquaculture, and processing

¹⁰ [2023 Economic Report on the EU Fish Processing Sector](#)

¹¹ [EUMOFA, "The EU Fish Market" \(2023 edition\)](#)

sectors. A previous study¹² demonstrated that enhancing the overall sustainability of seafood sourcing can lead to improved financial performance. For example, retailers often achieve their lowest seafood profit margins on the most overfished species.

6.5. Competitiveness of the EU fishing industry

According to FAO, the EU fleet has declined by 28% since 2000 and continues to shrink¹³. This is proved by the latest STECF report¹⁴ that shows that the EU fishing fleet continues to decline with the total fleet declining by 0.9% in 2022. This body concludes that, overall, the EU fishing fleet is very slightly profitable in 2022, and net performance decreased when compared to 2021. Employment decreased by 3% in total employed over the period 2018-2021; and –8.2% in FTE compared to 2018. The STECF concluded that: “The number of vessels and employment continue a long-term and steady decline”. According to the European Commission, “farmers, fishers and rural areas are increasingly affected by unfair global competition, higher energy prices, a lack of younger farmers and fishers and difficulties in accessing capital. For small-scale coastal fisheries, the average wage in 2021 was about half of the economy average wage”¹⁵.

President Von der Leyen, in her Political Guidelines 2024-2029¹⁶, stated that “farmers [and fishers] are often the most vulnerable part of this chain, we have to correct existing imbalances, strengthen their position and further protect them against unfair trading practices. Together, we will show that Europe will protect its own food sovereignty and those who provide for us all”.

For the outlined reasons, in line with the recitals of the current Regulation on ATQs, the EU must ensure fair competition between imported fishery products and Union fishery products on the

¹² Planet Tracker (2022): <https://planet-tracker.org/wp-content/uploads/2022/07/Carrefour-report.pdf>

¹³ FAO, “The State of World Fisheries and Aquaculture” (2022)

¹⁴ STECF, The 2024 Annual Economic Report on the EU Fishing Fleet (2024)

¹⁵ COM(2025) 46 final - The road to the next multiannual financial framework

¹⁶ Europe’s Choice - Political Guidelines for the next European Commission 2024-2029

Union markets, and the impact of the measures on the competitiveness of Union fish producers must be taken into consideration. In this vein, a recent study commissioned by the European Parliament's Committee on Fisheries¹⁷ recommends to “develop market standards that ensure a level playing field in the production of seafood and other marine products imported into the EU”.

6.6. Market-driven sustainability standards

In the context of the EU market, alongside established public and private procurement policies and regulatory instruments, there is a growing presence and influence of market-driven sustainability standards and their environmental and social sustainability certification schemes, such as MSC, ASC, Global G.A.P..

7. Social aspects

7.1. Nutrition and consumption of fishery and aquaculture products

According to the latest EUMOFA report on the EU fish market¹⁸, the escalating inflation had a significant impact on the prices of food, particularly of fish, causing their prices to rise by more than 10% from 2021 to 2022. As most of the EU supply of fishery and aquaculture products comes from external sourcing, this growth was aligned with the increased prices of imported products. Inflation resulted in a significant decrease in at-home fish consumption, which saw volume drop nearly 17% in the highest-consuming EU countries from 2021 to 2022. Further, this may have led to substitution effects, with EU consumers opting for cheaper animal protein products and reduced portion size, and also cutting back on the frequency of purchasing meat and fish.

Fishery and aquaculture products in the EU market provide nutritious food to EU consumers. The ATQ regime plays a role in ensuring that supply to EU households is sold at more affordable

¹⁷ [https://www.europarl.europa.eu/thinktank/en/document/IPOL_STU\(2024\)747291](https://www.europarl.europa.eu/thinktank/en/document/IPOL_STU(2024)747291)

¹⁸ [EUMOFA, "The EU Fish Market" \(2023 edition\)](#)

prices. While the EU processing industry should commit to sourcing from primary production with social and environmental standards equivalent to the EU's, the Member States should undertake controls to ensure the legality of the products, particularly through strict controls to ensure full respect for the prohibition of importing IUU products into the EU market and enhance efforts to ensure that mechanisms to check the compliance of the products with mandatory EU standards are met.

7.2. Employment in the EU's processing industry

Through the supply of materials at lower cost from additional sources, the ATQ regime facilitates supply for factories in the EU, contributing to year-round industrial activity and, ultimately, employment for workers.

7.3. Risk of sourcing from countries with low social standards

As the ATQ regime has an *erga omnes* effect, it facilitates tax derogations without being bound to a specific origin, irrespective of the social standards in the country of origin. Under the ATQ regime, there can be sourcing from countries that have not ratified conventions of the International Labour Organisation or other relevant international agreements, such as the Port State Measures Agreement and the Cape Town Agreement.

Whether or not social criteria is explicitly mentioned in the ATQ regime, it is essential that, in due time, the Forced Labour Regulation¹⁹ is implemented with the necessary resources and tools.

8. Recommendations

¹⁹ <https://marketac.eu/forced-labour/>

In the context of the consideration of the integration of sustainability criteria under the regime of ATQs for certain fishery products, the MAC believes that the European Commission should:

- a) Consider the regulatory situation of other food sectors in the EU market that also benefit from duty reduction or suspension regimes;
- b) Consider fundamental to ensure respect for the objectives and the concept of sustainability, covering the three pillars of sustainability, in the Common Fisheries Policy (Art. 2.1), including the ambition to contribute to the supplying of highly nutritional food to the Union market and to reducing the Union market's dependence on food imports;
- c) Consider the application of other pieces of legislation with an impact on the sustainability of the fisheries and aquaculture sector, such as the IUU Regulation²⁰, the Forced Labour Regulation²¹, the Corporate Sustainability Due Diligence Directive²², and the Regulation on countries allowing non-sustainable fishing, plus the recent revision of the Fisheries Control Regulation, including the provisions of paragraphs 9 and 10 of Article 58²³;
- d) Proceed with a steadfast implementation and enforcement of the pieces of legislation mentioned in recommendation c), in order to combat unsustainable fishing practices, to materialise the EU's commitment towards the long-term viability of global fish stocks together with global ocean partners, and to safeguard the competitiveness of sustainable businesses within the EU;
- e) Consider the relevance of non-legislative policy initiatives, such as the ongoing development of sustainability indicators for fishery products by STECF;

²⁰ [MAC-LDAC Advice on "The need for harmonised import controls between Member States in order to prevent the products of illegal, unreported and unregulated \(IUU\) fishing from entering the European Union market" \(21 April 2023\)](#)

²¹ [MAC Advice on "Forced Labour in the Fisheries and Aquaculture Market" \(30 November 2023\)](#)

²² [MAC Letter on "Implementation of the Forced Labour Regulation and of the Corporate Sustainability Due Diligence Directive in the Fisheries and Aquaculture Sector" \(4 November 2024\)](#)

²³ [MAC Advice on "Terms of Reference of the Study on Feasible Traceability Systems and Procedures for Prepared and Preserved Fishery and Aquaculture Products" \(24 May 2024\)](#)

- f) Enhance cooperation efforts with countries pre-identified as non-compliant (“yellow-carded”) under the IUU Regulation, to promote their alignment with better practices and standards;
- g) Ensure that Member States enhance controls and implementation of the EU IUU Regulation to avoid the entrance into the EU market of IUU fishing products as well as of products that do not meet the EU’s environmental and social standards;
- h) Promote the ratification by the third countries benefiting from the ATQ regime of the most relevant international agreements on fisheries management, such as UNCLOS, UNFSA, and FAO Compliance Agreement, while also encouraging them to be members of the relevant RFMO managing the targeted stocks;
- i) In line with the previous advice on a level-playing-field²⁴, ensure that operators and countries linked to IUU fishing and serious labour abuses (e.g., China²⁵) do not benefit from preferential market access (rather the opposite), as the EU should work towards achieving a true level-playing-field between EU produced and third countries’ fishery and aquaculture products – in this regard, the ATQ regime must be solely used when there is not sufficient supply in the EU market and cannot be intended to import non-sustainable products nor put pressure on the prices of EU producers;
- j) Invest in enhanced diplomatic efforts, including through trade relationships, to positively influence third countries that do not meet internationally agreed standards, in order to promote positive and prompter developments;
- k) Assess how potential legislative changes to the ATQ regime would impact competitiveness in the EU, including potential negative externalities on power shifts in the global geopolitical context, access and competition for blue raw material, reduction

²⁴ [MAC Advice on “Level Playing Field \(2019\)](#) (p. 4)

²⁵ [MAC-LDAC Advice on “Addressing China's global distant water fleet activities implications for fisheries governance” \(13 December 2022\)](#)

in the supply of raw materials, relocation of processing industries and de-industrialisation risks, economic viability, reduction in stable employment, boosts to the processing capacities in third countries with less stringent regulations, increase of the imports of final products, substitution for protein sources with higher environmental impact and/or less nutritious, administrative burden, while also assessing for potential positive social, environmental and economic impacts both internationally and in the EU;

- l) Ensure that the ATQ regime aims for the adequate supply of sustainable raw material to the EU's processing industry, avoiding market distortion, generating added value and employment, in a complementary and balanced manner to when the EU's production and free trade agreements are not sufficiently high to meet the demand, avoiding undue pressure on the prices of EU producers;
- m) In the context of the promotion of decent working conditions and respect for human rights, promote the ratification of the ILO conventions related to the fishing sector, particularly the Work in Fishing Convention, as well as the ratification of the Port State Measures Agreement and the Cape Town Agreement by the sourcing countries benefiting from the ATQ regime;
- n) Clarify the planned next steps of the assessments, including through more information on the specific criteria to be proposed, transition periods, and on the assessment of the most suitable policy tools to achieve the desired sustainability objectives;
- o) Secure transparency during the decision-making process of future ATQ regulations and duty-free tariff quotas, as the EU's democratic principles of accountability and public participation must guide all regulatory processes;
- p) To prevent undue shifts in trade flows and to ensure the effectiveness of EU sanctions against third countries, if import restrictions are in place for certain third countries, these should also apply to products caught by vessels flagged to those countries but processed in other third countries.

Annex

1. Views of ASC, APROMAR, COPA-COGECA, Danish Fishers PO, DPPO, EAPO, EJF, ETF, Europêche, FEAP, FEDEPESCA, FEDOPA, Good Fish Foundation, KFO, NOVA, PFA, Oceana, OPESCAYA, OPP Burela, WWF

Among the three policy options outlined in the Commission’s call for evidence, the subscribing members would favour a “new ATQ scheme with sustainability criteria”. In their view, imports benefiting from the ATQ regime should be limited, at least, to raw materials sourced from countries that have ratified key international agreements on labour conditions and fisheries management, including membership in relevant RFMO. Furthermore, the regime should not be accessible to raw materials from countries that have been “yellow-carded” under the IUU Regulation.

In their opinion, considering that the ATQ regime does not have specific provisions on the sourcing from countries with IUU fishing risk and that such products can enter the EU market²⁶, clear criteria to address the situation should be applied. It is to be noted, as is the case with Senegal, that the pre-identification of a country as non-cooperative is already triggering certain actions, such as the non-renewal of the Protocol until the yellow card is lifted. The suspension of the ATQ regime could, in addition, serve as an incentive for the country to enhance its management system and compliance.

From their perspective, given the widespread existence of trade agreements with third countries, limiting the ATQ regime’s eligibility to countries with internationally agreed-upon environmental

²⁶ [EJF | Trapped at sea: exposing North...](#) ; [The Ocean Outlaw Project](#); The New Yorker: [The crimes behind the seafood you eat](#) ; EJF: [Tide of Injustice](#) and [Zhejiang Ocean Family Co. tld and Its Fishy Business](#) ; Green Peace: [Choppy waters](#)

and social standards would still allow sufficient materials at competitive prices for the EU processing industry, avoiding any significant externalities.

These organisations recognise the importance of keeping the processing industry competitive but not at the expense of EU producers or by ignoring minimum sustainability standards.

2. Views of AIPCE, ANCIT, ANFACO-CECOPECA, CEP, Conxemar, Danish Seafood Association, EuroCommerce, FEICOPESCA, Fischverband, FRUCOM, PACT'ALIM, PSPR, SNCE, Unione Italiana Food, Visfederatie

The ATQ Regulation is a technical *erga omnis* duty regulation not designed for additional criteria. These should be regulated for all imports in the other relevant legislation. ATQ implementation should not create additional constraints that would place EU processors at disadvantage compared to finished products imported into the EU that may not be subject to the same constraints. The use of ATQ imposes already a significant administrative workload for stakeholders to fulfil the “end use obligations” with customs, meaning preliminary registration, guaranty deposit, control of flows. Several facts must be considered:

- The EU does not provide enough primary production of aquatic products: therefore, around 70% of the EU market demand must be sourced externally.
- The industry grapples with the lack of comprehensive bilateral and WTO approved trade arrangements with key sourcing countries, making ATQs essential for securing competitive raw materials.
- Raw materials constitute approximately 70% of the industry's total costs, making ATQs a valuable tool for competitiveness and fight against inflation, in the interest of consumers.
- Post-inflation, prices for certain species have increased by up to 30%, impacting both processors and consumers; ATQs can contribute to consumer's price stability in this context.



The subscribing members urge the European Union to recognise the economic importance of ATQs in ensuring the competitiveness and sustainability of the EU fish processing and trade industry. These members recommend the “Baseline scenario” and effective and harmonised implementation and control of all EU legislation. By implementing ATQs effectively, in conjunction with other policy instruments, and by streamlining administrative procedures, the EU secures a stable and diverse supply of raw materials, enhances the competitiveness of EU processors, and helps to maintain affordable prices for EU consumers.