



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

THE DIRECTOR-GENERAL

Brussels,  
MARE-B4/JG/

Mr. Antonio CABRAL  
President Long Distance RAC  
C/ del Doctor Fleming 7, 2º dcha  
28036 Madrid  
Spain

Dear Mr CABRAL,

Thank you for the Long Distance RAC position paper on the reform of the Common Market Organisation in fishery and aquaculture products (CMO). This paper pleads for the continuation of the current compensatory allowance for tuna intended for processing.

Tuna allowance is a complex intervention mechanism with heavy administrative burden for operators, Member States, the Council and the Commission. It involves regular notifications and data analyses, as well as the yearly adoption of the EU producer price by the Council and the adoption of a Commission Regulation once the mechanism is triggered.

The allowance has been used only five times since 2001 under the current CMO laid down in EC Regulation No 104/2000. The last one in 2007 amounted to only EUR 171.6 for albacore. You will appreciate that this mechanism entails disproportionate administrative costs with respect to potential benefits.

The CMO reform proposal abolishes the tuna allowance but provides for storage and eligibility for the relevant tuna species. We need to shift the policy on business-oriented planning and management of fishing activities away from reactive intervention. The main instrument at the disposal of POs will be the production and marketing planning, for which significant financial means have been allocated in the proposed EMFF. POs will be in a position to play a more active role in collective planning and managing the fishing activities of their members to better match their catches to the needs of the market (volumes, sizes, regularity of supplies) and to launch marketing initiatives to create added value (promotion, quality, certification).

As for the "compensation" character of the allowance in response to the autonomous elimination of tariff protection on tuna imported for processing, one should note that the trends in EU tuna supplies are changing steadily. EU canning plants rely more and more on tuna loins than on whole tuna as raw material. In addition, the EU tuna fleet has become more and more international and less dependent on direct landings of whole frozen tuna in the EU market.

Finally, it is clear that all products marketed in the EU should be subject to the same conditions as regards environment or hygiene, in conformity with our international obligations, e.g. under the auspices of the WTO. This is more complicated with respect to social or labour conditions in light of the WTO rules.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lowri Evans', with a stylized, cursive script.

Lowri EVANS