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F I S H E R Y P R O D U C T S

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A QUALITY POLICY FOR FISHERY PRODUCTS

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The current priorities in conserving and managing fishery stocks mean that the Community is having to produce fishery products in a context of long-term restrictions on authorized catches.

But even assuming that fishing capacity were adjusted to stock levels, it would still be necessary - if the fishing industry is to be economic and competitive in international terms - to strive for greater productivity and higher turnover by increasing average producer prices, i.e. by raising the quality of fishery products.

Improved quality is also what consumers want and is in keeping with the common fisheries policy; it must, moreover, be done in a way which fits in with the Community's general approach to the quality of foodstuffs.

Quality in the broadest sense covers a number of contexts and different levels of responsibility, and these need to be defined and identified before it is possible to decide on future action.

To simplify, a distinction can be made between health standards and commercial standards.

The health quality of fishery products depends on the quality of the marine environment - which may be affected by pollution of the sea - and the way in which catches are handled. The consequent health regulations are a matter for public policy (protection of public health) and are therefore the exclusive prerogative and responsibility of the public authorities.

Such health regulations have until recently been a national concern but will soon be covered by two Council Directives which, after transposition into national law, come into force on 1 January 1993.

The field of commercial quality, by contrast, is concerned with a number of objectives involving fair competition, control of fraud, protection of consumers and harmonization of product trade classifications at Community level.

Community regulations in this area cover standard classifications for fresh products and processing standards for canned sardines.

In summary, then, there is a need for minimum quality standards in the field of health and quality categories and classifications on the commercial side.

Beyond these areas, there is no existing legal framework for encouraging and stimulating improvements in the commercial quality of products undertaken by producers and traders. This is the avenue which has to be explored.

Improvements to the commercial quality of fishery products can only be sought within a specifically designed legal framework because of the special nature of the products and of fishing itself, as well as of the regulatory context in which fishing is carried on. This latter, i.e. the common fisheries policy, includes objectives with which any policy on quality could and should be consistent. Indeed, types of fishing which are more "resource-friendly" are often those which provide a better quality of product.

The aims of this quality initiative should also reinforce other objectives of the CSF, such as improving the incomes of producers and improving the products sold to the consumer.

To achieve these aims, the Community needs to create two kinds of instrument:

1. A Community scheme for officially recognizing quality in fishery products

This scheme should take the form of a legal framework designed to encourage producers and traders to improve the commercial quality of all or part of their output in order to qualify for official recognition of the quality they have achieved by means of production and marketing methods which they undertake to introduce.

The scheme should also promote partnership within the industry between producers and the trade with a view to higher quality products.

2. Incentives under the structural section of the fisheries policy

Measures to improve quality usually require investment in suitable equipment on board fishing vessels, at fishing ports and within the marketing and processing industries, as well as efforts to inform consumers and promote products to the public; this means making use of and adapting the instruments provided by the structures policy for fisheries.

In a similar vein, action has to be taken to encourage research, the exchange of innovative techniques and methods and the training of workers in the sector.

Finally, it is worth noting that the steps already being taken by some producer groups to pursue and promote better quality show that there is a perceived need for the legal framework being proposed here, and that it will be necessary to help optimize the impact of such existing initiatives.

A QUALITY POLICY FOR FISHERY PRODUCTS

In view of the stiff international competition faced by the Community fisheries industry, all aspects which might contribute to the economic health of the sector are coming under close scrutiny.

Since it will be impossible in a reasonable time-frame to influence some of the factors which affect the stability of the industry, particularly access to resources for producers and trends in international trade affecting traders and processors, it is more useful to focus on measures which can be undertaken at Community level to ease some of the difficulties with which the industry is beset.

As a result of developments in the conditions of competition in today's economies, competition is no longer conducted in terms of prices alone, but has moved into the fields of innovation and quality.

Improvements in the quality of fisheries products, like increases in productivity, can therefore be seen as an objective which can contribute to the profitability and competitiveness of the Community fisheries industry at both the production and the processing stages.

It is also an objective which responds to the emphasis increasingly put by consumers on the quality of foodstuffs.

The development of a quality policy for fisheries products is also in keeping with the general objectives of the common fisheries policy. However, such a policy must be coherent with the Community's overall approach to the quality of foodstuffs.

The Commission's general objectives regarding legislation on foodstuffs were set out in two communications provided for in the White Paper on the completion of the internal market:

- Community legislation on foodstuffs (COM(85) 603 final),
- the free movement of foodstuffs within the Community (89/C - 271/03).

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The concept of quality in food covers a number of contexts which need to be defined. In the broadest sense of the word, quality covers both consumer health protection and the definition of the commercial characteristics on the basis of which consumers choose among products.

It is important to distinguish between these two areas because the degree of responsibility of the public authorities differs in the field of health from that of commerce.

The purpose of health standards is to guarantee the safety of products offered for sale to the consumer. The public authorities are therefore responsible for laying down mandatory rules to achieve that objective.

Commercial standards are intended to define the characteristics of products with a view to ensuring market transparency, fairness of commercial trading and consumer information. The role of the public authorities in this area is therefore a great deal less straightforward. Within the framework of the common fisheries policy, they can act to promote the quality of products placed on the market. Such a policy can help increase producers' incomes by improving the competitiveness of the Community industry.

Although they fall under a specific policy, fisheries products are also subject to the horizontal Community legislation applicable to agri-food products.

Such rules concern, for example, labelling and additives (colouring, preservatives, antioxidants, etc.). These areas will not be the subject of special examination.

Similarly, it does not seem necessary, in a review specifically concerned with fisheries, to deal with the Commission's new approach to the mutual recognition of standards.

However, it is necessary to determine what kind of Community framework can most suitably be applied to the quality of fisheries products, in view of the specific objectives of the common fisheries policy.

After describing the present situation, this discussion paper considers the possibilities for action in this area.

P A R T I - C U R R E N T S I T U A T I O N

I. HEALTH ASPECTS

Health aspects may be defined in very broad terms and health problems may arise in relation both to the products themselves and to the surroundings in which they are processed or manufactured.

I.1 The environment

The quality of fishery products depends to some extent on the quality of the environment in which the fish and marine animals are caught or farmed.

Among consumers, the image of fishery products is usually that of a healthy product from a natural environment. Water pollution, whether permanent or accidental, may undermine product quality through bacteriological or chemical changes and, by tarnishing this image, make marketing more difficult.

In response to requests made by the Member States at various Council meetings on fisheries during 1988, Mr Clinton-Davis on behalf of the Commission gave the Council of 9, 10 and 11 December 1988 an oral report on the effects of pollution on fisheries activities and the extent to which Community environmental directives on pollution in the North Sea and the Baltic had been implemented.

Hitherto, the Commission has devoted most of its attention to the effects of pollution on biomass. (See the Commission's communication to the informal Council of fisheries ministers in Cuxhaven on 11 and 12 April 1988 concerning developments in the common fisheries policy in the Mediterranean, incorporated in the interim report on the fisheries sector - SEC(88) 753 of 20 May 1988).

The matter was raised subsequently at the informal Council at La Toja on 10 and 11 April 1989 where the ministers linked problems concerning protection of the aquatic environment with those relating to the quality of fishery products.

There is no doubt that environmental policy is the first step in a quality policy.

At Community level, there are currently two Council Directives:

- Directive 78/659/EEC on the quality of fresh waters needing protection or improvement in order to support fish life;
- Directive 79/923/EEC on the quality required of shellfish waters.

These Directives are not implemented uniformly by the Member States.

A further Directive, Council Directive 76/464/EEC on pollution caused by certain dangerous substances discharged into the aquatic environment of the Community, is more general in scope but has not achieved the results expected.

The interrelationship between the environment and fishing activities has also been considered by the OECD, which, at its 65th session in March 1990, decided to commission a study on the subject.

I.2 Health standards

In line with the objective of harmonizing national legislations as laid down in the Commission's White Paper of June 1985 on completing the internal market, and in order to remove barriers to trade arising from health problems in the fisheries sector, the Council recently adopted two further Directives:

- Directive 91/493/EEC of 22 July 1991 laying down the health conditions for the production and the placing on the market of fishery products;¹
- Council Directive 91/492/EEC of 15 July 1991 laying down the health conditions for the production and the placing on the market of live bivalve molluscs.²

The problem which arises is not so much the content of health standards as their boundaries. There can be no sharp line drawn between health and the commercial quality of products. One aspect shades into the other.

Of course, a product unfit for consumption on health grounds cannot be offered for sale. Health rules should therefore seek to define minimum thresholds which set a mandatory standard for products, the alternative being technical requirements setting health rules for production, processing, storage and transport. Commercial standards should apply only above those thresholds.

Although it may sometimes be confusing, such a distinction is nonetheless necessary to ensure that the Community rules are managed consistently and that their objectives are clear. This is a problem of methodology quite separate from the allocation of responsibilities among different Commission departments which share responsibility for the quality of products under a variety of headings.

1 OJ No L 268, 24.9.1991, p. 15.

2 OJ No L 268, 24.9.1991, p. 1.

Community law already contains rules laying down quality criteria for fishery products intended for human consumption. These are Regulations (EEC) Nos 103/76 and 104/76 laying down common marketing standards for fish and certain crustaceans.

For historical reasons, these rules are part of the market organization for fishery products. Although in the beginning they were limited to products subject to Community intervention, the criteria were extended to all fishery products landed fresh, other than anadromous fish, when the rules were revised in 1988.

When defining the organoleptic criteria to be applied in examining fish for health purposes, the Directive mentioned above on the health conditions for fishery products refers to the criteria in the marketing rules. By contrast, the definition of chemical and microbiological tests is included in the health rules.

Article 3 of that Directive also defers to later legislation the definition of health rules on catching fish and handling on board fishing vessels, although it does lay down rules for factory vessels.

II. COMMERCIAL ASPECTS

The introduction of a market organization for fishery products has resulted in common marketing standards. The fourth recital to Regulation (EEC) No 3796/81 states that "application of these standards should have the effect of keeping products of unsatisfactory quality off the market and facilitating trade relations based on fair competition, thus helping to improve the profitability of production", and Article 2 of that Regulation provides the Community with a legal basis for action in this field under the common fisheries policy.

The standards adopted under the market organization are compulsory since a product which does not conform may not be marketed within the Community; the rules under the market organization on the organization of production and prices are, on the other hand, optional.

II.1 Classification standards

The first standards to be adopted under the market organization were those now contained in Regulations (EEC) Nos 103/76 and 104/76. Based on the organoleptic criteria referred to above, they lay down three freshness categories for products. Combined with a classification by size and a definition of presentation (whole fish, gutted, with or without head), these freshness standards define the various product categories.

These standards act as a basis for the prices policy and permit a coefficient to be attached to each category of product which reflects its commercial value as a function of its quality.

In most cases, the fixing of the highest withdrawal prices for the best quality products simply reflects normal market patterns. Hitherto, the Commission has usually followed this practice. For some products, mainly those intended for use by the processing industry, such as herring and redfish, price does not vary according to quality.

Differentiating market support prices may also be regarded as a way of encouraging the production of quality products. This approach is attractive but nevertheless depends on the reactions of those operating in the market. An excessively high withdrawal price may dissuade potential purchasers and divert demand to inferior products at lower prices.

II.2 Processing standards

For a long time, the Commission's measures to lay down standards for fishery products were restricted to the stage of first marketing and therefore principally concerned products landed in the fresh state.

For certain sensitive products, it seemed appropriate to extend Community intervention to other stages of processing.

The first set of standards to be applied to processed products concerned preserved sardines (Council Regulation (EEC) No 2136/89 of 21 June 1989).

The Commission's original proposal formed part of a series of measures to support private-sector investment projects (see Statement by the Commission to the Council of fisheries ministers on 19 October 1988), in accordance with the forecasts set out in report COM(87) 219 final on the situation on the Community sardine market.

The current standards for sardines are mainly concerned with improving market transparency, harmonizing conditions of competition and promoting the marketing of good quality products.

With the same aims in mind the Commission is currently preparing a marketing standard for preserved tuna.

This method of defining special standards for products on an individual basis should be restricted to cases where problems exist at Community level either in intra-Community trade or in applying uniform measures in trade with non-Community countries.

In other cases the principle of mutual recognition of national standards should be considered adequate.

The framework of legislation in force therefore responds mainly to concerns in the fields of public health and the harmonization of marketing rules.

It should now be extended to include further objectives designed to achieve the best possible quality of certain products. Only the industry itself can pursue these objectives, which lie outside the scope of what the public authorities can achieve by legislating. Nevertheless, initiatives of this type should be encouraged, directed and fostered and the approach of the Community, in this regard as in that of managing the internal market, should be to provide instruments which meet these needs.

P A R T 2 - F U T U R E A C T I O N

The various Community measures concerning fishery products must be reexamined in the light of the general objectives of the common fisheries policy, integration of this policy with the Commission's other policies in the agri-food sector, and completion of the single market.

1. With regard to the environment, a policy on protecting the marine environment can be developed most appropriately at Community level. In turn, a Community approach cannot be seen in isolation from its international context. The Community should therefore look at other initiatives in this area.

The Community's participation in the study undertaken by the OECD could provide an opportunity to influence thinking on this subject so that interactions between the environment and fisheries are seen in terms of the effects of pollution not only on biomass but also on the quality of fishery products. Of course, the effects of a policy of protecting the marine environment on the quality of fishery products can be calculated only in the long or very long term.

2. With regard to health, rules have been adopted at Community level (see page 6) and are currently in the process of transposition into national law.
3. Community measures on the commercial side need to be backed by a legal framework which will motivate producers voluntarily to seek improved product quality and encourage operators downstream in the industry to ensure that improvements in quality are passed on to the consumer.

4. In the structural field, the policy of investment aid should be adapted to provide for differentiated rates of Community assistance which will offer a stronger incentive for investments to improve product quality at the production and marketing stages. Research and training could also be encouraged along the same lines.

The two last points (3 and 4) will be discussed in greater detail in this section, following an explanation of the reasons for and objectives of such Community measures.

I. REASONS FOR AND OBJECTIVES OF A SPECIFIC QUALITY POLICY FOR FISHERY PRODUCTS

The Commission has presented to the Council a proposal for a Regulation on certificates of specific character for foodstuffs¹, the scope of which, by reference to Article 38(1) of the EEC Treaty, covers fishery products. However, the special characteristics of fisheries and fishery production, which have given rise to a separate body of Community rules (the common fisheries policy), would suggest that a specially designed legal instrument is needed to encourage steps to improve the quality of this category of products.

I.1. The specific nature of fisheries

- Dependant on a limited living natural resource, fishing is one of the last remaining large-scale hunting activities, but at the same time it is faced with the constraints imposed by the market economy and the need to ensure viable production units. In other words, high production costs, linked to the costs of shipbuilding, using advanced technology and energy inputs, require an increase in turnover which producer prices are not always high enough to provide and which can no longer be attained through an increase in the volume of catches.

1 SEC(90) 2414 final.

Only an increase in average producer prices through more value added, in particular by improved product quality, can help increase the turnover of Community fisheries.

This objective seems perfectly realistic, provided that effective demand exists for such products within the Community and provided that producers are certain of reaping the benefits of operations which entail additional costs.

- Fresh fishery products are practically the only widely consumed product the intrinsic qualities of which owe nothing to human intervention¹. Their image as a "natural product" is one of their most marketable features.

Steps to improve the quality of unprocessed fishery products must ensure that the product undergoes minimal alteration between capture and consumption. While in the case of most foodstuffs, quality improvement involves enhancing the characteristics of the straight product, in the case of fishery products the concern is to prevent deterioration due to numerous factors from fishing techniques to shop display counters.

- The technical production environment, the fishing vessel, determines the quality of the product in many respects, which include fishing techniques, handling methods, preparation, refrigeration, work organization and the length of fishing trips.

Each of these aspects, involving individual techniques, technology or know-how, can be examined to find ways of improving quality.

1 With the exception of aquaculture products.

- No quality improvement is possible without effort on the part of the producer, but if this is to lead to any benefits, improvements must be maintained on down the line to the point of retail sale. All those involved in the marketing process must be closely associated with any measures to improve the quality of fishery products.

I.2. Specific characteristics of the rules on fisheries

The common fisheries policy, in its internal Community aspect, is founded on three complementary components:

- The conservation and management of resources, the objective of which is to control and restrict the depletion of stocks in Community waters in order to ensure their regeneration, thereby ensuring that fishing can continue. Conservation and management measures, which oblige fishermen to limit their catches, can never be fully successful while there is too much excess capacity in the fishing fleets.
- In the interests of pragmatism, structural measures have been focused, since 1986, on adapting and modernizing the means of production while restricting fishing effort. In a recent communication to the Council¹, the Commission stressed the current serious deterioration in stocks of certain species and the pressing need to ensure that fishing effort is optimally adapted to resources.
- The common organization of the market in fishery products, created in the late 1960's and the first part of the common fisheries policy to be introduced, was inspired by the market organizations for agricultural products. Today, this market organization operates in circumstances which are very different from those of the organizations under the CAP, since in global terms the Community market for fishery products suffers from a structural deficit, particularly as regards higher value products.

1 SEC(90) 2244/3.

The basic Regulation currently governing the market organization for fisheries, Regulation (EEC) No 3796/81¹, therefore contains few mandatory rules and its mechanisms apply only to producers who participate on a voluntary basis.

The real purpose of these mechanisms, particularly the price system, is to prevent or reduce short-term falls in prices linked to exceptional gluts in supply or the seasonal nature of catches of some species, and to support certain sensitive species.

In addition to the price mechanisms, the market organization provides for common marketing standards and lays down rules governing producer organizations and trade with non-Community countries.

The market organization must constantly adapt to production conditions, and changes in the near future will have to take account, in particular, of the increasing scarcity of resources.

Producer organizations, by regulating supply, together with the arrangements covering storage aid, withdrawals and carryovers, help to reduce the destruction of products on occasions when the market cannot absorb the quantities supplied.

In the same context, and for the purpose of achieving the objectives of Article 39 of the EEC Treaty, market policy must be able to provide an incentive for producers to try to improve quality in a manner which is consistent with the above-mentioned constraints on their activity.

I.3. The objectives of quality policy

As explained above, the marketing of fishery products for human consumption is subject to two types of rules relating to quality in the broad sense of the term:

¹ OJ No L 379, 31.12.1981.

- health rules, to which there can be no exceptions and which are concerned with the protection of public health.

- common marketing standards, laid down in Council Regulations (EEC) No 103/76¹ and No 104/76² as amended, which currently cover 33 species of fish as well as common shrimp, edible crab and Norway lobster. Using organoleptic criteria, these standards lay down a minimum threshold of freshness for the marketing of fish, as well as three categories of freshness above that threshold. Applied in conjunction with a sizing scale for each species concerned, these standards help to improve product quality, but their main purpose is to ensure the transparency of transactions and standardize classifications at Community level. In addition, by using freshness categories in conjunction with sizing scales it is possible to differentiate the annual prices provided for under the market organization rules.

These standards are binding, although they do not apply to small quantities sold directly by the producer to the consumer.

This framework should be supplemented in order to attain objectives at another level:

- to increase producers' income without increasing volume, i.e. by raising the average landing price;

- to give the consumer access to a range of products of guaranteed quality, clearly certified and specified using criteria on which information is readily available. This also entails improvements in transparency and fair trading at the wholesale and retail stages.

1 OJ No L 20, 28.1.1976.

2 OJ No L 20, 28.1.1976.

Under such a system, the consumer would be able to choose from a range of products clearly distinguished using transparent criteria (currently lacking in the retail trade in fishery products), and to make fully informed price-quality comparisons.

Such a quality policy can also be expected to alter the behaviour of some fishermen, since quality improvement presents less difficulties when "resource-friendly" or selective fishing methods are used, as the product is less damaged when caught and larger, more marketable sizes are selected.

This aspect can therefore also make a considerable contribution to the common fishery policy's general objectives of conservation and sound resource management.

These objectives can be sought by setting up an appropriate legal framework at Community level in order to encourage producers to improve the commercial quality of their products through voluntary commitment to an enhanced quality scheme. The results thus obtained must be extended throughout the industry by encouraging those active in all stages of marketing to become involved in the quality drive to achieve lasting improvements.

II. INSTRUMENTS OF COMMUNITY ACTION

Community action to promote the quality of fishery products should comprise two types of instrument:

- a Community scheme for the official recognition of quality fishery products;*
- contributions at incentive rates towards investments on board fishing vessels or in the marketing of products which have a direct bearing on product quality.*

II.1. Community scheme for officially recognizing quality
in fishery products

This scheme should be implemented by means of a legal instrument relating to production and marketing, along the following broad lines.

II.1.1. Production quality

As already mentioned, the first general principle underlying the system is that of voluntary involvement by producers or producer groups in a quality scheme within a legal framework created for that purpose.

All types of production (freezer trawlers, deep-sea fishing, inshore fishing) and all categories of products (fish, crustaceans, molluscs) should of course qualify for the scheme and will therefore be included in its scope. In practice, though, certain types of fishery lend themselves more easily to quality improvements (short trips, "resource-friendly" fishing methods) and the objectives are more likely to be attained in those areas.

Producers or producer groups will therefore undertake on their own initiative to use, for all or part of their production, methods which they themselves have defined in the form of a set of specifications and which guarantee an indisputable improvement in quality. The methods will relate to an indicative list of points set out in the Community legal instrument. A non-exhaustive list of these points is as follows:

- catch techniques,
- handling of fish on board,
- gutting,
- refrigeration,
- packing,
- landing,
- time between catch and first-stage sale.

Producers should be required to apply to the Commission, via the Member State, for their specifications to be registered once they have been scrutinized and approved by a national technical or scientific body. Registration at Community level will qualify producers to use an explicit indication of the recognized quality for lots of products presented for first sale, provided the specifications are met.

Member States would be responsible for monitoring the Community scheme of quality recognition, and should appoint a duly approved body for that purpose.

A legal framework of this type should be fully suited to the specific characteristics of fisheries production, should have the flexibility required by the wide variety of production methods and should guarantee no distortions of competition.

Lastly, the scheme must be open to imported products under the rules applying to trade with non-Community countries.

The recognition of quality granted under this scheme will apply to the first sale only: first buyers, and even more so wholesalers or retailers, cannot be allowed to refer to such recognition without there being additional provisions. If the ultimate objective is to be achieved, the quality improvements made at the production stage must be passed on by means of guaranteed marketing methods so that the end consumer can enjoy an unquestionably improved quality of product.

II.1.2. Quality during the various stages of marketing

Although production and marketing are distinguished for the purposes of clarity, for the quality initiative to have full effect and achieve all the intended objectives, the producers and the marketing side should be linked in a sectoral partnership with the latter formulating their own sets of specifications, thereby creating a general quality charter for a given production and marketing centre.

As the basic principle of voluntary membership will apply, the rules and regulations to be proposed can only help to further such an initiative.

The use of a label or mark of quality recognition on a product at the retail stage can only be contemplated subsequent to this process, which may be separate from or simultaneous with the same scheme at the production stage, which it will resemble.

In essence, only the criteria for improving the different aspects of marketing operations need to be different and it is not impossible that, given a sufficiently integrated production and marketing organisation, a single set of specifications in two parts could be envisaged.

The aspects specific to marketing could concern the following non-exhaustive list of areas:

- product preparation by port merchants;
- packing;
- maintenance of low-temperature regime;
- handling;
- refrigeration;
- transport;
- the time lapse between first-stage sale and retail sale.

It should be stressed that the whole scheme would also be open to processed products manufactured on the basis of raw materials that may have received quality recognition at the production stage.

A Community scheme for recognising the quality of fishery products is the appropriate framework needed to encourage the marketing and production sectors to improve the quality of their products, both for their own benefit and for the benefit of the consumer.

Since such an initiative would necessitate raising worker-awareness and indeed the training of the workers involved, as well as investing in suitable equipment and probably carrying out R&D into innovative methods, the initiative should be reinforced through the structural instruments of the common fisheries policy.

II.2. INCENTIVES UNDER THE STRUCTURAL SECTION OF THE COMMON FISHERIES POLICY

II.2.1. Investment

The Community possesses two legal instruments which allow it to assist investment in fisheries:

- Council Regulation (EEC) No 4028/86 of 18 December 1986 on Community measures to improve and adapt structures in the fisheries and aquaculture sector;*
- Council Regulation (EEC) No 4042/89 of 19 December 1989 on the improvement of the conditions under which fishery and aquaculture products are processed and marketed.*

Regulation (EEC) No 4028/86 does not include direct provision for the improvement of fishery product quality. The implementing regulations have, however, taken the problems associated with quality into account in drawing up the list of equipment eligible for Community assistance.

The incentive level of the aids for equipment leading to quality improvements should therefore be increased, on the basis of the existing rules and regulations set out below which could be adapted along these lines.

(a) Fishing vessels

Commission Regulation (EEC) No 894/87 implementing Title III of Regulation (EEC) No 4028/86 as regards the modernisation of the fishing fleet in respect of improvement or modernisation of the hold, catch preparation machinery, icemaking equipment and coldstore plant.

(b) Facilities at fishing ports

Commission Regulation (EEC) No 2321/88 implementing Title VIII of Regulation (EEC) No 4028/86 as regards measures for the provision of facilities for the supply (production, storage and distribution) of ice to fishing vessels.

(c) Processing and marketing facilities

Commission Regulation (EEC) No 4042/89 has the express aim of improving hygiene, quality, preservation and packaging of products (Art. 1(1)(g) - Art. 9). Priority is given to investments which meet this aim (Art. 11).

(d) Products, information and promotion

Commission Regulation (EEC) No 2320/88, implementing Title IX of Regulation (EEC) No 4028/86 as regards projects to locate new markets, provides assistance for promotion campaigns, consumer surveys and market studies to improve the quality of products offered to the consumer.

The Community has already financed in this regard a promotion campaign for quality deep-frozen fish in Portugal. This campaign was particularly directed towards consumer information and enabling consumers to identify high-quality products.

This type of measure should be developed under the Community scheme for quality recognition, which presupposes an effort on consumer information.

II.2.2. Research

Council Regulation (EEC) No 3252/87 of 19 October 1987 on the coordination and promotion of research in the fisheries sector enabled the Council in its Decision of 19 October 1987 (87/534) to approve Community research and coordination programmes in the fisheries sector for the period 1988-92.

Under one of the four topics adopted, the upgrading of fishery products, provision was made in the Community research programme to look at the issue of improving the quality of landings of fish, molluscs and crustaceans, while in the Community programme for the coordination of research the standardisation and development of analytic methods for fishery products was studied.

The Commission accordingly issued a call for research proposals (88/C.172/07) under the Community research programmes part-financed by the Community budget. This call for proposals expressly aimed to improve the quality of landings of fish, molluscs and crustaceans.

This effort should be continued and it is important to encourage the development of innovative technology by allowing, by way of derogation, the ceiling on public aid to be exceeded in respect of investments in equipment for improving product quality installed on an experimental basis.

II.2.3. Training

In its communication "Education and Training in the European Community: mid-term guidelines", the Commission has already stressed the importance it attaches to improving the quality of training, an integral part of the structural Funds' priority objectives, by placing emphasis in particular on training in the context of rural development.

The fisheries sector in general displays a number of handicaps as regards training:

- primary vocational training is very unbalanced from one Member State to another and is almost non-existent in some cases;
- there is often scant availability of continuing vocational training, particularly as regards artisanal fishing;
- the workforce is modest and dispersed and teaching institutions are few as a result;
- it is often difficult for these institutions to justify or make cost-effective use of expensive teaching aids and materials.

The above characteristics indicate the difficulties faced by this sector in increasing the quantitative and qualitative efforts required in primary and continuing training.

In this regard, the Community dimension can, in the context of existing Community policy instruments on vocational training, offer solutions to the needs of the fisheries sector, conditional upon the sector increasing its involvement in Community programmes such as:

- *Petra* (Vocational training of young people and their preparation for adult and working life);
- *Force* (Continuing vocational training in Europe);
- *Eurotecnet* (Community action programme in the field of vocational training and technological change).

Within this general framework, product quality is one of the aspects which should be integrated into all levels of theoretical and practical training.

More immediately, the following concrete steps can be taken at various levels to raise professional awareness and train or even retrain fishery workers with a view to improving product quality:

- The dissemination throughout the Community of existing or innovative know-how by means of training courses or study trips involving workers and trainers from a number of Member States;
- The training and retraining of fishery workers with a view to their assignment as technicians to the "quality control" departments of fishing enterprises, producer groups or marketing firms.

These measures can be supported by the Community as transnational training measures or, where appropriate, under certain structural Fund operations.

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The possible benefits of a policy on quality fish products can be evaluated in economic, commercial and consumer terms, in full accordance with the general objectives of the Treaty and the common fisheries policy. The benefits can also be analysed from the viewpoint of a close and complementary relationship with the need to conserve and manage resources.

Both the drive for quality and the promotion of higher quality, currently the subject of initiatives taken by different groups in the production and marketing sectors, are thus responding to a perceived need.

It is for the public authorities, and primarily those at Community level, to assist these measures and to provide them with the resources to achieve the desired results.