



MEXILLÓN DE GALICIA
• **Consello Regulador** •

28.12.2009

2009/D001CR

OPINION:

On the proposal for a Book green of the reform of the common fisheries policy.

This text corresponds to a machine translation of the original version in Galician.

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1.- Book Green of the reform of the common fisheries policy.
COM (2009) 163 end. Brussels 22.04.2009. Commission of the European communities.

PRINCIPLES THAT SHOULD SETTLE A FUTURE COMMON FISHERIES POLICY IN THE EU

The **document on the CFP asks questions on fishing, and basically on Fisheries of far**, with brief references to the nearby, including sea activities the conuiculture. Missing questions, answers and specific proposals for our activity, making it difficult to adjust the indent of the Green Paper gives CFP.

For well being, we would **do a deep design work on policies that needs the sector to improve**, without forgetting to **l as competencies** on activity, and on many aspects affecting us also **correspond to the Administrations closely**.

In the absence of these Policies, director document of CFP - and all the rules which it emanates - must set basic concepts on which to base, and that in regard to the conuiculture, must be:

1. Conuiculture: Mussels and others. Characterization.

1.1.- Specific **structure socio-economic sector** has a huge effect **as social dynamiting in the local environment and as economic multiplier in the local development** ^[1].

1.2.- The mussel cultivation , in spite of much interested information , **conducts systemic echo positive to the natural environment** for example helping to control the coastal eutrophication and act as a CO sink atmospheric ₂ contributing to the biological fixation of: nitrogen, phosphorus and CO ₂ atmospheric ^[2], circumstances that van timidly taking consideration of legal, taking level "recognized, for example, that *"the cultivation of bivalve molluscs filters can have a beneficial effect on the quality of coastal waters on the withdrawal of nutrients... taking into account that is not necessary complementary feeding and that therefore the environmental impact could be less than in other sectors of aquaculture in this regard.*"^[3]

1.3.- The mussel cultivation **clearly differs from other activities aquaculture** to not be characterized by earlier set out paragraphs.

1.4.- The mussel cultivation **shares the above characteristics, and is fully compatible with the perspective of molluscs in general - shell fishing or cultivation - sector and with the fishing**, as acknowledges the Department do Mar gives Galician ^[4] "when Express *"the redistribution of the economic and social role "represent fishing and the shell fishing "why which concludes These activities "should be differentiated industrial fishing and" subject to rules specific "just like that "cultivation molluscs need: be considered activity differentiated inside of the aquaculture and be subject to specific rules* , because it cannot compete on the same model of regulation therefore play a social role, environmentally and economically distinct.

1.5.- Collects the document the CFP as *"the fishing activities should be based on principles economic rational. The fleets must increase its economic strength..."* (page 6, 3rd paragraph).

As well, **inside This necessary rationality in the scope of this economic environment, the mussel cultivation sector and competent** -within the meaning of training necessary for the better performance of its activities - **claimed that the common fisheries policy** - given the specific **structure socio-economic sector - will have encourage organizations with adequate dimension and a concentration rational and efficient operations.**

1.6.- Agree with the Green Paper that the *"fishing, with its wide" proportion of small and medium-sized enterprises, plays an important role in the social and cultural large number of coastal regions identity fabric European "*, and on the income of many communities." Also the identity cultural coastal, environmental compatibility, social function and improvement local pensions is closely tied to the conquiculture, and in Galicia mainly to the mussels, as originally stated. Unanimity is, therefore, total the desirability that persists and optimize fishing, the shell fishing ^[5] and the conquiculture as something distinct.

In our opinion, is need to **a differentiated conquiculture management regime for other forms of aquaculture**, and at the European, compatible and shared with fishing and the shell fishing have a component of proximity in the local sea.

Out of prejudice of contributing to GDP (gross domestic product), and promote intra-changes to increase such contribution, not experiments with structural changes should be that could affect the environmental and social sustainability.

2. Political goals versus sectorial objectives

2.1.- The current CFP establishes that *"1 to common fisheries policy will ensure rational exploitation" of living aquatic resources to facilitate economic conditions, environmental and social sustainable* ^[6]

The Green Paper, provided that the economic and social sustainability requires the existence of healthy marine ecosystems, thereby long-term **1 ye ecological objectives, Economic and social** can maintain balance, although such balance is clearly

unstable short-term, and the own **normative current not sets a priority among the three** goals.

Might also prioritize potential situations within the same objective options. For example - and without prejudice to the necessary improvement initiatives-, the conquiculture, and same small-scale fisheries and the shell fishing maintain balance in the short-term economic, environmental and social objectives. Why **obstacles to maintain that balance also should not be generated long term**. Some have recognized their role of redistribution of the ¹ economy mainly because all the income generated by the placing on the market of products are distributed directly between sailors, gatherers and producers respectively, circumstance that it generates an effect dynamic and very beneficial in the local socio-economy. Therefore - and repeat, without prejudice to improvements-, any proposed structural modification should be analysed in depth with the sector to avoid possible incidents negative in its sustainability. In this sense, most scholars of the economy, cast doubt GDP (gross domestic product) ^[7] as an indicator of social and environmental well-being, and parallel sustainability.

2.2.- For support employment or create alternative employment in other activities (through IMP, etc.), obviously in the sea, employment employed is being occupied by foreigners because it is less attractive for our sailors. Regarding employment for their own account, primarily in the mussels, **begin to materialize the effects of the promotion of productions in third countries**, and then say, have different conditions production (economic, health, ecological, social, etc.), and without encouraged its internal consumption have aimed their production to our markets traditional, which translates into low prices and reduced revenues as that **not remedy it, would mean a deterioration, also, employment by has own**.

2.3.- Given the structure conquiculture - with integrated into organizations-micro sectorial the best policy for the support of existing employment, would be the financing **of collective projects through the** organizational entities to promote in institutions themselves the generation of capital gains, to capitalize on the them, and once passed the stage of implementation of the principles of management efficient activities, engaging activities progressively change and improving the relations of production and consequently the improvement of the social well-being of producers.

2.4.- Governance. Without pronouncing us purpose-built on the assumption of the Commission's powers from the called procedure of comitology, yes we understand that **aspects decision-making related to the conquiculture (along with fishing and) (the shell fishing) should be competence of their specificity**, EE.MM specialization and linking local sea in that sense, the conquiculture, like all economic activity, need legal certainty and cannot be subject the arbitrariness in administrative decisions.

2.5.- Observance. When agents are part of the same social group, the rules may not be written, and informal social control is sufficient for the observance of a desired by all behaviour.

When agents come from different groups or group increases dimension, **1 as rules should be beneficial to the collective**, be written in a way clear and be achievable, and enforcement requires the existence of measures discourage of anti-social acts or if they were, that punished the punishable conduct.

But for Justice in the application of sanctions necessary certainly know what behaviours are which deviate from the norm. If not, we all tend to think that residents

are less name causing behaviours competitive to try to compensate for the potential damage that created them cause others.

2.6.- Principle relative stability, we have established through a system of distribution for which the quota corresponding to each Member must keep constant over time.

In the conquitculture would be application as an internal organizational principle and transit expensive to a situation of nominal stability with the search for balance, with the Building expensive actions to market until maximum sustainable biological performance.

2.7.- Optimization do resource. Without doubt the most of the conquitculture would be obtained promoting market volume and value towards collective action (with) actions parallel improvement organization, of production processes and (in marketing) to maximum sustainable biological performance, and thus given the sectorial structure with the development of a sectorial culture of the enforcement, as previously mentioned.

2.8.- Information for decision making the accumulation of information allows to carry out the control, and also allows direct measures to achieve goals. The problem setting the objectives for which will be used this instrument informative and the use of information beyond the established in the arbitrariness of its use. Therefore the collection, treatment, use and storage should be standard and strict control on each of performance levels. And rather than if the information accumulated more Apart from being purely statistical, itemizes to the point of being individual character that identifies each company information.

2.9.- We understand that the activity that performs in coastal areas the conquitculture and artisanal fleets and the shell fishing, should benefit from specific conditions based on objective environmental maintenance and the economic and social fabric in the areas in question.

3. Organization. Sectorial entities.

3.1.- Making need a specific section on the organisation of the sector - as well as does it the Green Paper on the CFP - in the sense referred to the structuring of functions and relations within a group, highlights:

- * el recognition of the limitations (micro) units that form the sector to perform actions beyond the productive function. Explicit that the individual performance are unattainable activities of marketing, marketing, R&D, legislative initiatives, etc. All linked to the size of enterprises.

- * in otherwise, in search of the efficiency of actions in such activities, only make sense establish policies and measures at the level collective, explicitly depositing the entities that own authority The European Union has recognized as compatible with established policies the EU, and the consequent responsibility for their implementation and results.

3.2.- A postulated generally admitted is that delegation of authority leads to assumption of responsibility; or responsibility is assumed by delegation of authority. In the case that us, only in the situation have delegated powers, may Sue sector

responsibility for its implementation. In this case returns to be fully cash that the sector *needs legal certainty*, since the powers must be clearly specified, referring to the need simple and easily applicable rules. For example the current common policy of fisheries, for example standardize in Regulation (EC) 104/2000, recognizes and promotes the importance of organizations that tend to concentrate supply for equitable response to a demand increasingly concentrated, voluminous and organized. To this legal backing to the concentration primary sector is suffering in successive years the application of another contradictory, legality of Defence of competition. We understand that the legislation on competition is not consistent with reality shell-dwelling, and less even if that reality is projected onto its own tendency. Why is impossible give the industry more a management capability if you do not specify clearly that has been delegated and freedom to organize outside its economic activity.

4. The productive environment. Integration in the IMP.

4.1.- Any other food production has, as the conquiculture, a link so closely with the natural environment where copes. The conquicultor not adds a stranger to media for food and development substance of Bivalves. Does not require the use of drugs (antibiotics, vaccines) (etc.), or of animal health products (fungicides, anthelmintics, etc.). And not any manipulation of environmental variables is performed.

In fact, the molluscs grow and develop up until the time of their harvest fed by nutritive matter present in the natural environment (phytoplankton and matter) (organic particulate).

Since molluscs Bivalves feed by filtering, are able to concentrate in their tissues all beneficial compounds present in sea minerals (omega) 3 nutrients...), but on the other hand, if the quality of the waters of breeding not is appropriate, bivalves can accumulate harmful substances, what undertake to their hygienic state - health.

Thus, both the sustainability these practices environmentalist, cultivation as their capacity to provide safe food, are mostly conditioned by the availability of an environment of high quality, to save the best conditions hygienic - sanitary.

Aware of the environmentalist nature of this culture **the European authorities established**, through publication gives Directive 79/923/EEC, **own status and a regime Special for all waters where breeding develops protection of bivalve molluscs.**

In this sense the development of application water-DMA framework directive ^[8] shall, at least, maintain the same level of protection of zones shell-dwelling offered by the directive on the quality of the waters for breeding of molluscs^[9], and enforce, as stated in the European strategy document of sustainable aquaculture ^[10].

If the standard would observed and fulfilled two EE.MM from authorities all the production of shellfish areas would be classified as "areas". Its manifest breach - even to requirements of the sector - since 1979 (date) penalize sector in more than 30 years of damages (of that directive). **No is disproportionate request that allowances for collective harm is translated into policies and aid to promote the cultivation of molluscs.**

Same some authors that have linked to anthropogenic increase sea pollution of biotoxins (intensity, periods of presence...), what evidence a sharp productive and commercial damage.

Therefore, repeat, precise conchiculture: **be considered distinct activity in aquaculture and be subject to specific rules**, because it cannot compete on the same model of regulation because it plays a role social, environmental and economic different, which advocates the maintenance **exclusive reservation**, that differentiates production areas of the areas where you can perform other activities that may disrupt nature This form of food production.

4.2.- On the other hand, the Green paper expressed **by marine space increasing competition**. The first to establish will then be based on what considerations qualify them priority of the various activities that can have incompatibilities. Enter modifications to a sustainable and stable balance requires great care: in Thus, paraphrasing the document of the Department do Mar, "*1 to CFP is an integral and today predominant part in the IMP*" "*Are new IMP approaches that should be done gently in the CFP and are also structural elements of the CFP that have to be taken into account in constructing a IMP*".

Beyond the competition for marine space activities having incompatibilities, we understand that optimum use of the productive potential of the marine environment cannot have a contribution to the GDP () component exclusively (Interior gross) If this alter the relations of production to the detriment producers.

5. Market.

5.1.- With a view globalization of the economy, promoting, defends or protects the offer of third countries for, based on concurrency and competitiveness, provide protection European consumers. With the same globalizing vision of the economy as system, you should claim the promotion, defence and protection of consumption in ESES countries equitable defence of the rights of the global consumer (native) (in this case), so worthwhile cause imbalance and inequality in the system itself economic.

We understand that the policies and actions of the CFP concerning market products of the fishing cannot be established exclusively to "*pro protection of the*" *European consumers* "because **1 as reasons for the necessary protection (of)**" **(the micro demand) non consumer differ from the necessary protection (of the) (micro supply) the producing European** shell-dwelling, both are agents economic characteristics - saving distances - similar.

In any case, market actions must establish face to maintain a balance between defending the European consumer and sectors European producers.

E in terms more extensive, making assert the defence of the citizen - regardless of their status of producer or consumer - market actions should be established by entering regarding concepts as the "carbon footprint" for the prioritization of the access products to market.

5.2.- Products of the fishing and aquaculture Gets an overall lower profitability to the profitability of other agric-food sectors. On the one hand due to the predominance of fresh products (for lack of an offer) (innovative processed products) and the lack of a philosophy and the marketing application^[11].

Prima already then alleviate this shortcoming, incorporating resources (human, economic, educational, etc.) for the implementation of such knowledge and practice.

"The situation of the" practices of competition in the market of fishery products has altered significantly in recent years very negatively to the producers,... ", "... through a process of concentration on the side of the distribution, resulting in the case of products of the primary sector, very negative producers while consumers effects no equitable benefit "(Department do Mar.)" (Cit. opens). For sample the traditional products of the processed Mussel, in which the concentration of the MDD (distributor marks), market dimension reduces the final price to the consumer by up to 42 % of the MDF (manufacturer timestamp) ^[12], as well, such reduction in price, distributors it affect waters up to the manufacturers and to the primary as credited sector the discounts applied in the last campaign of the mussel in Galicia. One of the palliative measures essential in this case is to have - in a security context legal - concentration of supply organizational structures.

In this sense the oligopsony (purchase oligopoly) maintains the *"interest in not differentiate the" product, or which means all them an advantage to increase their margins trade to the detriment of primary producers "*.

5.3.- By another band, the European Union itself recognizes that there are institutionalized figures that enable the consumer paid better extent to the primary sector, basically through actions of differentiation, and in the recitals of regulation No. 510/2006 ^[13] on designations of origin protected States that *"...the products presenting certain characteristics can be very beneficial for the rural world,..., to ensure the improvement of income of the farmer "*.

In addition, inside These figures, and in defence and protection of indigenous productive sectors European, there are those who have a special impact **because differ between cultivation and processing is performed in the same geographical area, which is the (denomination of protected origin), DOP versus others that do not require the same requirements as to IGP (protected geographical identification), and others left as aquaculture ecological ^[14] have a positive recognition to the consumer, are of generic application to all products of the same category regardless of what the area is geographic.**

In Therefore, online as stated in the previous section on low profitability of primary sectors, and in order to alleviate the lack of a market-oriented philosophy and application marketing, **you need an extra effort on the part of authorities in favour the introduction and consolidation mainly the DOPs, and their management.** entities

5.4.- Certainly the most of the conchiculture would be obtained by promoting collective action market in pursuit of the volume and the value (with parallel actions for improvement of) (Organization, processes of production and marketing) to the maximum sustainable biological yield, and all, given the structure sectorial, with the promotion of a sectorial culture of enforcement, as before mentioned.

We agree with the expressed in the Green Paper that a new CMO to *"made" "much greater emphasis on improving the way in which producers are organized" and consequently in the implementation of policies and aid in that sense.*

5.5.- The growth in demand for sea products is a growing need of however fail of raw materials and products for marketing to the processing companies. So, arguing more needs volume (this is not the case of molluscs) and lower cost, our industry marketing transformation ye came replacing products and indigenous raw materials by others from third countries.

Together with this observation has been used the argument that the cost of transformation is high, weakening the competitive position regarding other parts of the world, then indicates that is needed to import raw materials, which applies a tariff additional cost which harms rather than to the high cost of transformation.

Given that the population consumer segment based on the available rent is represented by a pyramid Oblate, broad-based companies, mostly focused on price competitiveness, strategy in which fall strategy imports (raw materials or products), posed in turn a belligerent action against indigenous productions (raw materials) (or products).

Do competitive transformation through the lowering cost, in an imaginative effort - led to absurd - us would lead

occur in equal conditions in which occurs in this third countries more competitive on cost: low wages, elimination of protections and health workers, lack of occupational risk prevention or rather lack of job security, lack of responsibility environmental, sub price of raw materials and impoverishment of the producers, conditions products, etc.

Another alternative competitive cost is the abandonment of the indigenous production and the subsequent relocation.

Notwithstanding the cost loses significance in the competitive position when this focuses in referring to attributes, values, etc. variables quality, in the conditions for production (ecological responsibility, social responsibility) (etc.), in the projection differentiated product, innovation product, etc.

In thus to meet the challenge we could establish a mix of competitiveness based on competitiveness - cost and competitiveness – value.

Therefore to contribute to the downstream industry products **competitiveness-cost for raw materials**, propose measures **support for the improvement of European production of conuiculture (the raw material of) (most in demand by the transformation aquaculture)**. In this regard, and bearing mind that the vast majority of the primary sector enterprises are enterprises and family businesses, conditions should be easy access to specific measures to **improve yields** (structures) organizational improve supply and marketing processes and that its time make viable preferential collective research for elderly (volumes by production units, improvements in production processes, etc.)and **improves productivity** (preferential collective research for) technological improvements to increase production by operator, training and training processes and best practices available, (etc.), and that in the environment sustainability environmental, social and Economic and do maintain the natural quality of the products obtained.

On the other part to contribute to the industry **competitiveness-value transforming the** , products without going into other issues internal sector, would establish commercial enhancement measures of products with innovative products, marketing support (denomination of protected origin, etc.) differentiated quality labels and communication from the highest value that each brings and that are preferred polo consumer.

The combination both lines of action in a single mix would improve the competitive position the indigenous production (raw materials and products) and the position Economic and social of the persons involved, and also contribute to mitigate

the environmental cost supported by society as a whole by provisioning of products and raw materials at a greater distance.

5.6-Sector of the bivalve molluscs is fully aware and interested in offering the market safe products to the consumer, products with health guarantee .It is obvious that any health problem (- or alarmist advertising of) (a simple health alert, as you already have caused-) you can encounter Bivalves - own mollusc or third-party - related causes loss consumer confidence in our products, with the consequential commercial and economic implications.

Therefore, and in the light of the outlined in the strategy for European aquaculture ^[15], paragraph 4.3 on a reassessment of the legal instruments the marine biotoxins arising from the report issued by the EFSA (European food safety authority), we mean that in April 2006 a Group of States, which include the European Community ^[16], met in Ottawa-Canada at the request of the Committee of the CODEX on fish and (CCFFP) fishery products to analyze the report of the consultation of experts FAO/IOC/who (2004), reaching a set of principles guiding deliberations and debates, including the following ^[17]:

- (a) They should establish standards for the biotoxins when it lacks evidence of damage to human beings, whether from clinical studies in beings data human epidemiological studies or voluntary feeding studies in animals.
- (b) To make recommend intervention levels should consider all the available pool of knowledge on marine biotoxins. This knowledge comes from scientific knowledge of the history of operation the level of consumer protection regulatory programs.

Whereas paragraph (b) above, to our experience shows us way blunt or current intervention level ensures a high degree of protection of European consumers from these toxins.

Thus, for example, during the period covering the years 2003 to 2006 only outbreaks were reported in Spain three of food poisoning caused by these toxins ^[18].A negligible if we consider that an estimated number in these four years were consumed in Spain around 1,500 million kilograms of molluscs bivalve from one of the main molluscs-producing areas Bivalves in Europe - Galicia-. And considering further that in that time period occurred in Galicia episodes of toxic phytoplankton blooms very intense and prolonged. And also two of these three outbreaks were caused by consumption of Bivalves contaminated than non pass by the relevant health as they were collected by those affected directly controls of the natural environment ^[19] illegally. And in a third case by a Portuguese longueiron game consumption of uncertain origin.

That reinforces still most know that control systems work and ensures a high level of consumer safety.

We must remember that the bivalve molluscs are a healthy, healthy, natural, nutritious food and balanced, whose benefits are widely recognized by the community scientific.

Throughout the above, we consider necessary to^[20]:

- (a) The modification current legislation that could potentially lead to the reduction of the set level will not report a proportional increase in the rate of consumer safety. However, closures will multiply administrative areas of production with the well-known effects socio-economic.

In any measure management do risks made on bivalve molluscs must consider both the real risk that the consumer is subject as the benefits that impacts to the consumption of bivalve molluscs.

Consequently we demand that European Commission remain current levels.

(b) On the other side, without going into the discussion on which is the best method of detection of the ocaidaic acid and derivatives, demand that of changing the method of detection current reference in the EU must ensure:

(a)The same level of protection consumer that so far both ensured the bioassay test in mouse as of the rat.

(b) As the reference method for these toxins should be measured exclusively those compounds that There is proof that are toxic to humans, and must not therefore register false positive.

(c)-this method must be compatible with practice cultivation - seed - and not hinder the work cultivation: for which must be fast, reliable, economic...

(d)-that the method should allow a frequency and intensity of comparable analysis that is currently logged in Galicia.

e authorities must define the method to ensure uniform application and some results reproducible throughout the EU and in third countries with permission for bivalve molluscs to EU exports.

6. External dimension.

6.1. In this section **thanks to the reader a nova 5.1 we here by paragraphs reading reproduced completely.**

6.2.- In the appearance outside, the development cooperation or the AAP (fisheries partnership agreements) should consider the consequences and effects on sectors European producers.

Easy access by absence of barriers to entry (economic, technological, scientific, etc.) in some primary activities of fishing - in our case the conuiculture- and the intensively of the labour factor, are extremely attractive characteristics not developed countries.

Once implanted These activities, as in these countries there is no such consumer culture products, production increases the speed of which increases the consumption, orienting offer export surplus precisely countries propitiated cooperation, with the consequences expressed in paragraphs **5.1** and **5.5** previously specified.

Therefore, these **activities should not be offset to obtain rights or benefits for companies with interests in those third countries.**

These practices are in total confrontation with the EU European because neutralise the effects indigenous sectors-building policies of possible aid to them. This practice continuity **of consideration may entail the disappearance of the productive sectors Europeans, given different production** (economic conditions), (sanitary, ecological, social, etc.).

Same aid structural should specify as property acquired - without prejudice of necessary innovation and according to the sensitivity of the sector referred to in the consequences - function must remain in the European Union by a greater period of time, because they are causing the same effects as the development cooperation also recently named "development cooperation" "with returns".

Therefore the shell-dwelling- Galician in particular - sector claim regarding the external dimension of fishing, has been **exclusion of the conquiculture as object of consideration**, or as far as where inevitable such course, conditional agreements that building in the country consumption of products obtained third always exceeds the promotion activities relating to the conquiculture (cultivation, training) (research,...).

6.3.- Products food, and importance of aquaculture and its products derivatives (canned, frozen, etc.), have a special sensitivity vector food quality conditions (especially in the) referring to security food, healthy-hygienic, including traceability (tagged, information to the consumer, etc.). Therefore, the conventions and agreements with third countries would require a thorough study to ensure that both procurement processes and products obtained from aquaculture, as well as processes and products that incorporate materials premiums obtained through aquaculture (even more in the case of raw materials) (from third countries not signatories of the agreements or conventions), **is correspond fully with European legislation** or conditions that could be recognised as equivalent **both processes as in** products.

This special account becomes the real situation in that batches of products native of the conquiculture are subject to strict controls, while imported only responding to monitoring (obtaining items low) (statistical probability).

These situations for example led to the recent incidents concerning the import of Panga contaminated Vietnamese, recognizing the limitations of control **both in origin (processes - products) as in the PIF-point inspection Border** (products only), and thus notes the response of the Commissariat of SANCO Mrs Androulla Vassiliou to question P-3907-2008 parliamentary.

The same reasoning We do extensive - processes and products - applying it to variables that define sustainability, under penalty of being enhancing destroyers countries the environment of their natural wealth with conditions medieval, pauperization, etc.

7.- Research and technology.

7.1.- No doubt that the social progress is linked to the creation of knowledge and its dissemination and application. Special expensive consideration is necessary then to the research. Certainly new knowledge will provide better management activities in all aspects (biological, productive, organizational) (commercial, etc.).

In the sixth Research framework programme, 98 million € earmarked projects research in the field of aquaculture, of which 32 million were awarded SMEs ^[21], do it follows that **more than 66.6 per cent of aid were aimed at a few large enterprises aquaculture** .

Given the structure sector of the European conquiculture, individualized actions in question of research are hardly defensible. Are projects and the collective activities which can lead to efficient results and should be organizations that design and implement projects should be care and preferential support. It would be another field in which enhance the involvement of the sectors in their own development and assumption of responsibilities.

8.- Policy structural and public financial assistance

The maintenance of structural aid must remain while the objective is not achieved by which were created, the improvement of income two producers.

Since a large part of the issues detailed in this document, and which prevents the improvement of such income might alleviate by improving the Organization of the producers and their organizational structures, there must be aid preferred for collective projects which are hardly acceptable by SMEs, You must have preference in its financing.

9.- Conclusions.

The current system economic exists because there is production for consumption and increase its dimension based on consumer demand. Marketing, as link a string, if it would not remain, requires the existence of production. The EU should consider if you need marketing without sector productive, in a situation of dependence from abroad, or if strategically requires a productive sector that - competent in the performance of its activities-boost a marketer sector consistent with production and the market.

The balance of the system will be maintained that the conditions of production (health, environmental, social, economic...) are the same in the EU and in third countries. Free trade cannot be at the expense of those who support these conditions of production, either directly in the source, or indirectly (the) own productive sectors of the EU and same Europeans together (when suffer the consequences of that form of produce). Same could be quantify those conditions of production variables and set rates of compensation (e.g. relating to the "carbon footprint") for that all products have equal conditions in the market.

Galicia, 28.Decembro.2009

Francisco a. Mayor García
President

^[1] The contribution of mussel activity to the local development of Galicia. School of business Caixanova. Board regulatory do mussels of Galicia. 2000.

^[2] Edebo, I. J. Haamer o. Lindahl; Lo Loo; I. Piriz (2000). Recycling of macronutrients from sea to land using mussel cultivation. *Int. J. Environment and Pollution* 13 (1-6): 207.

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^[3] Regulation (EC) No. 710/2009 of the Commission on 5 August 2009, do amending Regulation (EC) No. 834/200 /, not that regard á provisions fixing of implementation for the organic production of aquaculture animals and seaweed.

^[4] Position of Galicia before the Reformation of CFP. Department do Mar. Galician (section III) (paragraph 3).

^[5] Includes fishing and the shell fishing having thus assumed the position paper of the Galician regional management above.

^[6] Regulation (EC) No 2371 / 2002 of the Council on the conservation and the sustainable exploitation of fishery resources as part of the policy common fisheries.

^[7] Among many others: Commission for the measurement of economic performance and social progress. Joseph Eugene Stiglitz, (Nobel Prize in economy 2001), Amartya Sen (Nobel Prize of) (Economy 1998) .

^[8] Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000, do establishes a framework Community action in the field gives policy of waters.

^[9] Directive 79/923/EEC do Board Directors, October 30 of 1979, relative á quality required of shellfish waters (codified in the Directive 2006/113/EC of the) European Parliament and the Council of 12 December 2006 on to the (quality required of shellfish waters).

^[10] Communication of the Commission to the European Parliament and the Council. Building a sustainable future for a aquaculture. New impetus to the strategy for the sustainable development of the European aquaculture. 08.04.2009 COM (2009) 162 final

^[11] Analysis of supply and marketing of fisheries products and aquaculture in the European Union. Address General of Maritime Affairs and Fishing. European Commission. May 2009.

^[12] PUELLES Perez, José Antonio; PUELLES Gallo Maria. Distributor marks (MDD): 100 ideas key. Distribution and consumption 241 Julio-August 2008

^[13] Regulation (EC) No. 510/2006 of the Council of 20 March 2006, do on the protection of geographical indications and designations of origin of agricultural and food products.

^[14] Regulation (EC) No. 710/2009 of the Commission on 5 August 2009, do amending Regulation (EC) No. 889/2008 that is implementing Regulation (EC) No. 834/2007, in which concerning the fixation of rules for the application for production organic aquaculture and marine algae animals.

^[15] Communication from the Commission to the European Parliament and the Council. Build a sustainable future for aquaculture. New impetus to the strategy for the sustainable development of European aquaculture. 08.04.2009 COM (2009) 162 final

^[16] The group, chaired by Canada, formed it the following States: Belgium Chile, European Community, Spain, USA, France, Ireland, Japan, Mexico, new Zealand, Norway, Netherlands, UK, Thailand, Vietnam and FAO.

^[17] CX/FFP 06/28/6-Add.1 report of the meeting of the working group to assess the the special query biotoxins who/FAO/IOC expert advice in bivalve molluscs.

^[18] Martin Granado, a. Varela Martínez, M.C. Frías Torres, a.; Ordoñez Banegas, P.; Hernández Domínguez, M.; Cano Concierge, r. and Hernández Pezzi, g. (2007). Outbreaks of food poisoning marine biotoxins due to consumption of fish and seafood in Spain 2003-2006. Weekly Epidemiological Bulletin 15 No 12: 133-136.

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