

Letter from: Jens Harting, Head of Public Affairs, Edeka Zentrale AG & Co KG, Hamburg

To: CFP Reform, MARE, European Commission, Brussels

Date: Hamburg, 18.12.2009

Subject:

Opinion on Green Paper

Reform of the Common Fisheries Policy

EDEKA has drawn up the enclosed paper by way of participation in the European Commission consultation process regarding the reform of the Common Fisheries Policy (CFP) and to explain the commercial view of the requirements set out in Section 5.4 of the Green Paper.

As Germany's largest foodstuffs retailer with 12 000 markets, and the largest fish merchant in Germany with over 2 000 fresh fish counters, a sustainable fisheries sector is of vital importance for the EDEKA Group.

In our opinion all measures must share the common aim of ensuring that fishing within the European Union generally takes place within the framework of sustainable stock management.

For fish caught under the CFP the sustainability systems and seals currently required would need to be monitored in accordance with the CFP rules. For fish imports the seal of sustainability would be provided by the differentiation label which indicates to the consumer that this fish product and EU fish come from sustainably managed stocks. The EU Commission's efforts to establish minimum requirements for sustainability seals and for aquaculture have our express support.

This would lead to a recovery of fish stocks in our waters. It would also lead to increased pressure on account of the expectations of consumers who would have to use fisheries from non-EU countries. European fisheries would therefore develop a role as a model for sustainability.

In order to successfully take this route, we think that the following are necessary

- a better correlation between scientific recommendations and agreed fishing allocations,
- long-term management plans based on an ecosystem-based diversity rate,
- a reduction in by-catch in combination with a ban on landing,
- a significant reduction in bureaucracy and
- effective monitoring of the rules of the fisheries policy.

In future we will only be able to continue to benefit economically from fish if the policy is decoupled from national interests, and common framework conditions are created for securing this limited resource.

Thank you for this opportunity to take part in the consultation process. We hope that our proposals are of interest to you.

[Complimentary close]