

Thoughts...

- Clear views that the playing field is not level (actual vs anecdotal)
- Clear concerns regarding NTMs in EU:
 - Importance to verify origin for both imports and exports (customs to consumer)
 - Standardisation required for all EU countries (e.g. SPS, certificates etc)
- There are costs in navigating non-tariff measures...
 - Sometimes it can be a direct cost of losing business or even a shipment
 - Sometimes it's just red tape
- Company reputation is at stake
 - risk avoidance taken creates costs to trade

=> The direction of travel regarding barriers to trade is unclear

#	Technical Measure	Brief description	Examples
A	SANITARY AND PHYTOSANITARY MEASURES (SPS)	Measures that are applied to protect human or animal life from risks arising from additives, contaminants, toxins or disease-causing organisms in their food	<ul style="list-style-type: none"> hazard analysis and critical control point (HACCP) requirements maximum residue limit is established for insecticides, pesticides, heavy metals and veterinary drug residues testing and certificate requirements for SPS related factors
B	TECHNICAL BARRIERS TO TRADE (TBT)	Measures referring to technical regulations, and procedures for assessment of conformity with technical regulations and standards	<ul style="list-style-type: none"> Labelling, marking and packaging requirements Product identity requirement (including biological or organic labels) Conformity assessment related to TBT (including testing, certification and traceability)
C	PRE-SHIPMENT INSPECTION AND OTHER CUSTOMS FORMALITIES	Compulsory quality, quantity and price control of goods prior to shipment from the exporting country, conducted by an independent inspecting agency mandated by the authorities of the importing country	<ul style="list-style-type: none"> Goods imported under a preferential scheme such as GSP must be shipped directly from the country of origin in order to satisfy the scheme's rules of origin condition

#	Non-technical Measure	Brief description	Examples
D	CONTINGENT TRADE-PROTECTIVE MEASURES	Measures that counteract adverse effects of imports in the market of the importing country, contingent on fulfilling certain conditions	<ul style="list-style-type: none"> Antidumping – to counteract imports “injuring” domestic companies Countervailing – to counteract subsidies of exporting country
E	NON-AUTOMATIC LICENSING, QUOTAS, PROHIBITIONS AND QUANTITY-CONTROL (MEASURES OTHER THAN FOR SPS OR TBT REASONS)	Measures to limit the quantity traded, such as quotas. It also covers licences and import prohibitions that are not SPS- or TBT-related	<ul style="list-style-type: none"> An import-licensing procedure where approval is discretionary or requires specific criteria to be met Restriction of imports by a maximum quantity or value that is authorized. Tariff rate quotas – for EU fish traders as this may result in different tariffs (i.e. zero or WTO) being charged within or above quota limits
G	FINANCE MEASURES	Measures intended to regulate the access to and cost of foreign exchange for imports and define the terms of payment.	<ul style="list-style-type: none"> They may increase import costs in the same manner as tariff measures Advance payment requirements (import transaction and/or import taxes) Multiple exchange rates (varying rates, depending on the product category) Prohibition of foreign exchange allocation and other authorisations)
H	MEASURES AFFECTING COMPETITION	Measures to grant exclusive or special preferences to one or more limited group of economic operators	<ul style="list-style-type: none"> These refer mainly to monopolistic measures, such as State trading, sole importing agencies, or compulsory national insurance or transport
O	RULES OF ORIGIN	Laws, regulations and administrative determinations of general application applied by government of importing countries to determine the country of origin of goods	<ul style="list-style-type: none"> For fish products, rules of origin must be shown on import to EU countries. This includes processed products and may be open to challenge if the correct documents are not available
P	EXPORT-RELATED MEASURES	Applied by the government of the exporting country on exported goods.	<ul style="list-style-type: none"> Export-licenses, export quotas, prohibition of exports

Summary of issues identified

Species type	#	NTM category	#
Shellfish	6	HEALTH AND SAFETY	10
Farmed fish	24	TRACEABILITY AND LABELLING	8
Crustaceans	11	TECHNICAL MEASURES	17
Processed fish	9		

Origin label
Certificate of Origin
Catch certificates
Health certificate
Coating used in cans
Limited access to market at reduced duty
Different label criteria
IUU fishing
Names result in different duty (e.g. Gadus="cod")
SPS level of antibiotics
Finance measures
Health and safety
List of permitted species
Coating inside cans
Origin label
Managing origin to reduce tariffs
Financial measures VAT
Export measures
Differences in ports
Delays in export certificates
Delays in imports with fresh/super fresh

Region	#	Country
INTRA EUROPE / ICELAND&NORWAY	9	Vietnam
NORTH AMERICA	12	Bangladesh
SOUTH AMERICA	7	China
ASIA	19	Korea
MIDDLE EAST & NORTH AFRICA	9	Morocco
		Argentina
		Iceland
		Norway
		US
		Vietnam
		Angola
		Japan
		Netherlands
		Russia
		Italy
		France
		Argentina
		Gabon
		Chile

Cost	#
0-5%	12
5%	11
10%	10
25%	1

Value chain	
Primary producer / First buyer / Wholesaler (EXPORTS)	
First buyers / agent / wholesaler / processor (IMPORTS)	
Agent / Processors (EXPORTS)	
Secondary Processors (IMPORTS)	
Distributor / Retail / Catering (IMPORTS)	

Some examples

- Names simplification needed

- Delays in export certificates

- Delays in imports with fresh/super fresh

One EU country has a more restrictive law...

- Nephrops catchers in the UK dip their catch in 4HR to avoid browning.
- 4HR has been permitted in the EU since August 2006 for use in crustaceans up to a level of 2mg/kg, and has largely replaced the use of sulphites.
- Some countries outside the EU (e.g. Japan), do not permit this additive.

- There is a chemical used in cans that is put in the lacquer of the interior part of the tin
- France has prohibited it, rest of the EU hasn't
- This makes us to have to duplicate the number of references, increase cost, complicate management, etc.

Fish fingers. US exporters don't use correct "non-manipulation certificate" as required by EU, as product is exported first to Korea and not required

There is a +/- max tolerance on levels of antibiotics if close at point of export, difficult to judge how this may be when tested on import given random samples are taken.
If found "over" then go on a blacklist to be checked.

- Procedural, SPS level of antibiotics not accepted.
- No further communication with EU legal authorities
- Container destroyed if not accepted

Identifying trade issues



The choice experiments implementation is designed to elicit details of measures impacting the trade of seafood in Europe. It is built from five main attributes: species, non-tariff measure, region, value chain stage and cost impact.

Non-tariff measures choice experiment

CARD No.	Respondent No.	Comments				
		SPECIES: NTM: COUNTRY:	OTHER DETAILS:			
Species relevant for the respondent (tick only one for each card, and add cards as needed):						
Species (SELECT ONE):		SHELLFISH (e.g. Scallops, oysters, mussels) <input type="checkbox"/>	CRUSTACEANS (e.g. Prawns, lobsters, crabs) <input type="checkbox"/>			
		MARINE FISH (e.g. Cod, plaice, tuna) <input type="checkbox"/>	FARMED FISH (e.g. salmon, trout) <input type="checkbox"/>			
NTM attribute relevant for the respondent (tick only one for each card, and add cards as needed):						
Non Tariff Measure (SELECT ONE):		HEALTH AND SAFETY <input type="checkbox"/>	ENVIRONMENTAL BARRIERS TO TRADE <input type="checkbox"/>			
		TRACEABILITY AND LABELLING <input type="checkbox"/>	TECHNICAL MEASURES <input type="checkbox"/>			
Market Region (SELECT ALL THAT APPLY):		INTRA EUROPE & ICELAND/NORWAY	NORTH AMERICA	SOUTH AMERICA	ASIA	MIDDLE EAST & NORTH AFRICA
Value chain stage for respondent:		Circle cost impacts (or enter OWN %) for each relevant combination of Market region and Value chain stage (%)				
Primary producer / buyer / agent / Wholesaler (EXPORTS)		<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%
First buyers / agent / wholesaler / processor (IMPORTS)		<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%
Processors (EXPORTS)		<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%
Agent / Secondary Processors (IMPORTS)		<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%
Distributor / Retail / Catering (IMPORTS)		<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%	<input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 25%