



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

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Mr. Pedro Reis Santos  
Market Advisory Council  
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B-1000 Brussels  
Secretary@marketac.eu

**Subject: Better Alignment of Import Control Schemes in Major Market States**

Dear Mr Reis Santos,

Thank you for your letter of 28 September. The EU catch certification scheme has been in force since 2010, and in that period, we have globally, regionally and bilaterally actively promoted market-related measures as part of the fight against IUU fishing.

In general, your recommendations reflect the line that the European Commission has been taking for the past years - both through the involvement of other large market States, such as the US and Japan, as well through our intense involvement in the elaboration of the FAO Voluntary guidelines on Catch Documentation Schemes (CDS) and our constant pursuit in RFMOs of the introduction of such schemes. In addition, we developed an EU IT system (CATCH) to handle catch certificates electronically upon imports to the EU.

Regarding **engagement with counterparts who are also big market States**, such as the US and Japan, I would first of all like to refer to the Joint Statements to combat IUU fishing from 2011 and 2012. Following these statements we created IUU working groups where part of our discussions relate to import related measures. In this context, the European Commission has always encouraged our counterparts to establish similar measures, in particular highlighting the EU catch certification scheme and later on the FAO voluntary guidelines on Catch Documentation Schemes. At the end, it is of course the decision of a third country to introduce such measures, but we are convinced that our efforts have played an important role in the US introducing the Seafood Import Monitoring Program (SIMP) and in Japan seriously considering to introduce additional market-related measures to the current implementation of RFMO schemes.

The Commission fully agrees that any further development of market-related control schemes should respect the six guiding principles of the **FAO Voluntary Guidelines for**

**Catch Documentation Scheme (FAO VG CDS).** In this context, we need to focus our support to the FAO on its awareness raising campaigns as well as for the development of a practical guide and best practices to assist States, RFMO's, and other stakeholders in developing, reviewing, harmonising and implementing CDS for wild capture fish.

This leads to your next recommendation on work in **RFMOs to align Key Data Elements (KDE)**. In this context, our approach is to continue to push for the introduction of new CDS measures on a case-by-case basis, notably taking into consideration criteria like the status of the specific stocks, the volume of catches or the economic relevance of the fishery, and the improvement of the existing CDS ones while referring to the FAO VG CDS. This could, in some cases, require adaptation of existing data requirements, but our first objective is to ensure the introduction of sound RFMO CDS, in the absence of any. Analysing the comparative table in the report from NGOs, it is clear that some cases and in certain cases all RFMOs do not require certain data as listed in the KDEs. While we fully recognise the ease for industry to have the same requirements everywhere, there is in many cases a practical or political reason why this data is not required. This exercise is of paramount importance account taken of the fact that the sound RFMO CDS can be considered as equivalent to the EU catch certification scheme. They need to be developed according to certain standards though.

In response to the recommendation on the use of digital means (in line with the FAO VG CDS), I would like to mention the EU IT system for catch certificates, CATCH. As you know, the use of this system will only become obligatory for EU stakeholders when the legislation is in force and applicable. Once we reach that stage, we will have a much stronger global position in influencing discussions on interoperability and data exchange. So, I call on you to invite all your members to start getting acquainted with CATCH as soon as possible, even if not obligatory yet, so we can address any errors that might be in CATCH at the moment.

This leads me to the recommendation on **interoperability** between electronic systems in market States **to allow for cross-checks to identify illegally caught fish**. The European Commission has already recognised that interoperability could become a challenge. We are therefore currently looking to a solution where international standards are developed, under the UN, in order to ensure correspondence between IT systems of all States, not only market States, for catch documentation schemes. Again, we work towards simple unique solutions rather than envisaging scattered ad hoc IT developments that could only complicate life of operators acting on different markets. This project is in its very early stages and we will keep you informed about the development.

Another aspect is **data exchange with other market States** for the purpose of cross-checks to identify illegally caught fish. Business confidentiality is at stake and needs to be respected just as data protection rules applicable in different countries will need to be complied with in this context. In any event, cooperation on submitted data is the basis for checks and verifications in the context of any CDS and we will further support such ties in the future.

Let me thank the MAC for its commitment and valid input. Should you have any question on this reply, I invite you to contact Ms. Pascale Colson ([pascale.colson@ec.europa.eu](mailto:pascale.colson@ec.europa.eu); +32 2 29 56273).

Yours sincerely,

Charlina VITCHEVA