

Differences in scope and quality of checks by Member States persist

Preliminary findings on the implementation of EU import controls measures in 2020-23



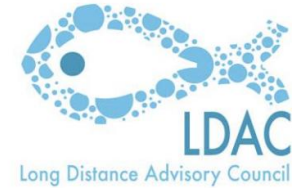
Market Advisory Council, March 2025

Presented by:

Jesus Urios Culianez from the Environmental Justice Foundation (EJF), a member of the **EU IUU Fishing Coalition**

Disparity in implementation of import controls across Member States

According to the 2018-19 biennial reports



MAC-LDAC Advice

The need for harmonised import controls between Member States in order to prevent the products of illegal, unreported and unregulated (IUU) fishing from entering the European Union market

Brussels & Madrid, 21 April 2023

Disparity in implementation of import controls across Member States

According to the 2018-19 biennial reports



“Significant differences in scope and quality of checks by Member States weaken the system”

European Court of Auditor report (2022)

→ **ECA recommends differences be addressed by 2026**



EU Catch Certification System Ecosystem



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CHECKS OF ALL IMPORT CCS
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**APPLICATION OF A RISK-BASED
APPROACH TO ASSESSING CCS**



**VERIFICATION OF CCS TO
ASCERTAIN COMPLIANCE OF
IMPORTS**



PHYSICAL INSPECTIONS



**REJECTION OF CONSIGNMENTS
IN THE CASE OF NON-
COMPLIANCE**



**BIENNIAL REPORTING ON
ACTIVITIES UNDER THE EU IUU
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Focus Areas



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Have verifications and rejections increased since 2018-19?



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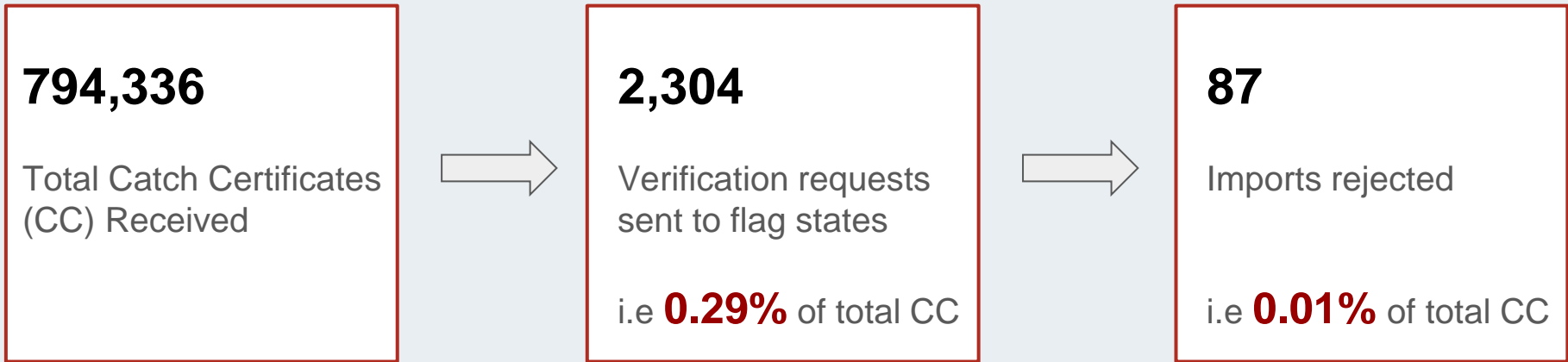


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Low verifications and rejections rates of imported fishery products persist across the EU

Across all Member States that shared data - between **2020-2023**:



Particularly low verifications and rejections rates of imported fishery products by some top importing Member States

Comparison of some top importing Member States:

Year	# Catch Certificates (CC) submitted			# Verification requests sent to flag state			# rejected imports		
	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23
Spain	122,222	109,271	121,337	551	207	314	13	10	15
Italy	96,736	83,005	60,903	1	0	2	0	0	2
Germany	41,965	35,452	60,477	223	431	322	1	9	7
Denmark	38,878	41,120	37,911	88	91	90	2	3	2
Sweden	32,505	31,584	31,132	0	0	0	0	0	0
Netherlands	22,878	29,311	26,635	89	101	140	16	10	3
Portugal	24,446	15,795	20,223	0	7	13	0	0	2

- Lack of control persists in Italy, Portugal & Sweden



Particularly low verifications and rejections rates of imported fishery products by some top importing Member States

Comparison of some top importing Member States:

Year	# Catch Certificates (CC) submitted			# Verification requests sent to flag state			# rejected imports			% CC from China or a yellow carded flag state		
	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23
Spain	122,222	109,271	121,337	551	207	314	13	10	15	9%	9%	9%
Italy	96,736	83,005	60,903	1	0	2	0	0	2	13%	8%	9%
Germany	41,965	35,452	60,477	223	431	322	1	9	7	6%	6%	4.8%
Denmark	38,878	41,120	37,911	88	91	90	2	3	2	2%	1%	1%
Sweden	32,505	31,584	31,132	0	0	0	0	0	0	1%	0.1%	0.3%
Netherlands	22,878	29,311	26,635	89	101	140	16	10	3	15%	11%	10%
Portugal	24,446	15,795	20,223	0	7	13	0	0	2	19%	19%	16.5%

- Lack of control persists in Italy, Portugal & Sweden – with a higher IUU-risk for IT & PT



Particularly low verifications and rejections rates of imported fishery products by some top importing Member States

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⇒ 0.01% rejections

- Lack of control persists in Italy, Portugal & Sweden – with a higher IUU-risk for IT & PT
- Low rejections, even in Member States with tighter controls (e.g. Spain: 0.01% of CC are rejected)



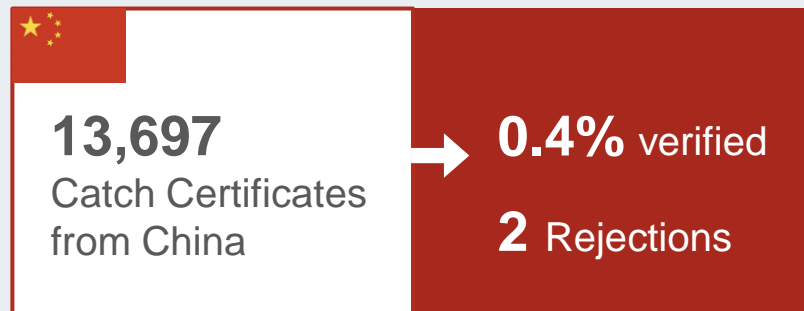
Fisheries products from China are still not being rejected or adequately verified

Across all Member States that shared data:

2020 - 2021

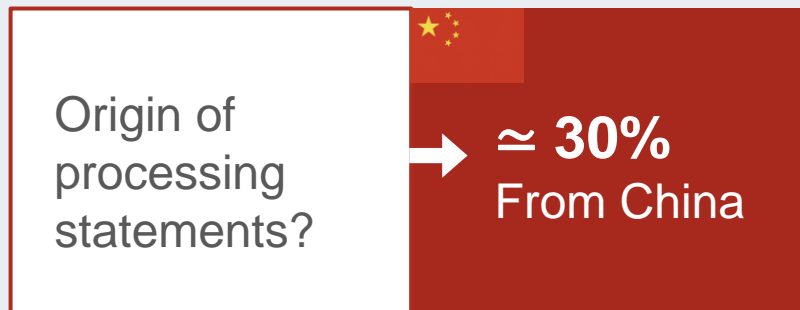


2022 - 2023



Most Member States do not verify information with processing states

Each year (2018 - 2023)



- Only few Member States verify catch certificates information with the processing states
- Some countries (e.g. Italy) do not provide information on number/origin of processing statements



Have physical inspections increased since 2018-19?



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PHYSICAL INSPECTIONS

Under the EU IUU Regulation,
Member States have to physically inspect >5% of direct landings
(on average across all flag states of origin)

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Non-compliance with the 5% legal threshold for physical inspection of direct landings persists

Comparison of Member States that declared receiving direct landings from third countries (excluding Latvia):

Year	# total Direct Landings (DL)					
	2018	2019	2020	2021	2022	2023
Spain	159	151	146	220	244	217
Netherlands	264	258	204	1217	1081	1137
Denmark	662	395	282	514	509	523
Poland	136	119	120	117	93	92
Lithuania	41	15	123	122	93	107
France	686	693	469	1148	-	-
Ireland	36	25	31	644	700	609
Sweden	230	156	211	338	349	334

Note that the “-” in the table indicate that the data was not shared by the Member State



Non-compliance with the 5% legal threshold for physical inspection of direct landings persists

Comparison of Member States that declared receiving direct landings from third countries (excluding Latvia):

Year	# total Direct Landings (DL)						% DL Inspections (>5% required)					
	2018	2019	2020	2021	2022	2023	2018	2019	2020	2021	2022	2023
Spain	159	151	146	220	244	217	96.9%	92.7%	86.3%	74.5%	75.0%	81.1%
Netherlands	264	258	204	1217	1081	1137	5.3%	7.4%	3.4%	4.1%	4.4%	3.2%
Denmark	662	395	282	514	509	523	5.1%	4.1%	7.8%	5.3%	5.1%	4.6%
Poland	136	119	120	117	93	92	4.4%	2.5%	5.8%	4.3%	2.2%	2.2%
Lithuania	41	15	123	122	93	107	4.9%	13.3%	3.3%	4.9%	8.6%	9.3%
France	686	693	469	1148	-	-	14.6%	17.0%	17.1%	13.1%	-	-
Ireland	36	25	31	644	700	609	27.8%	20.0%	100.0%	44.7%	39.3%	34.3%
Sweden	230	156	211	338	349	334	5.7%	5.8%	5.2%	5.3%	5.7%	6.0%

- Great differences between Member States in the proportion of DL being physically inspected
- Some of the Member States that receive the most DL inspect below the legal minimum threshold of 5%



Non-compliance with the 5% legal threshold for physical inspection of direct landings persists

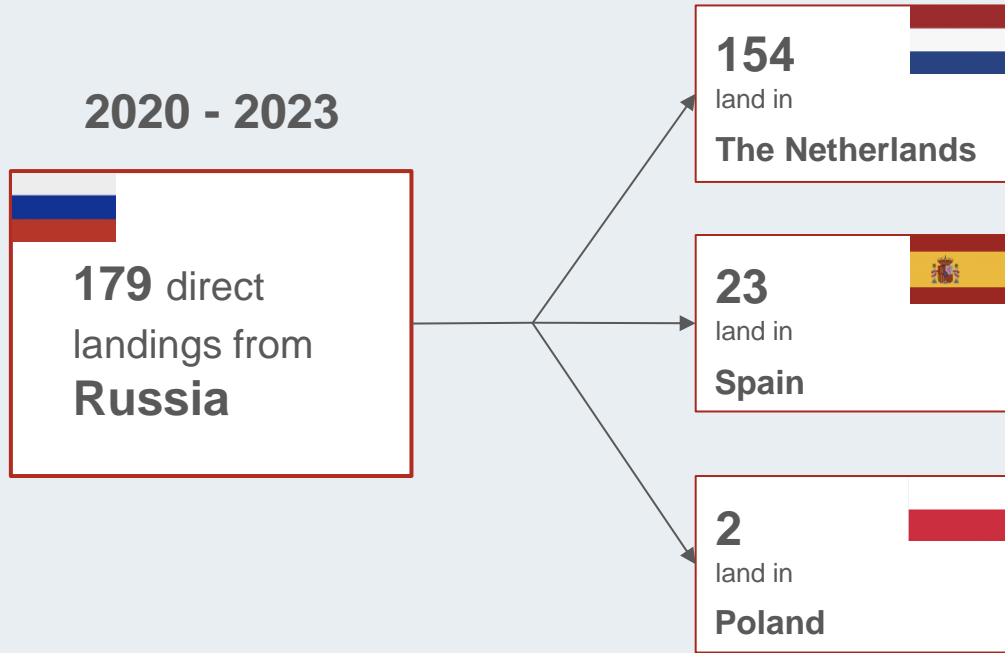
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Lithuania	41	15	123	122	93	107	4.9%	13.3%	3.3%	4.9%	8.6%	9.3%
France	686	693	469	1148	-	-	14.6%	17.0%	17.1%	13.1%	-	-
Ireland	36	25	31	644	700	609	27.8%	20.0%	100.0%	44.7%	39.3%	34.3%
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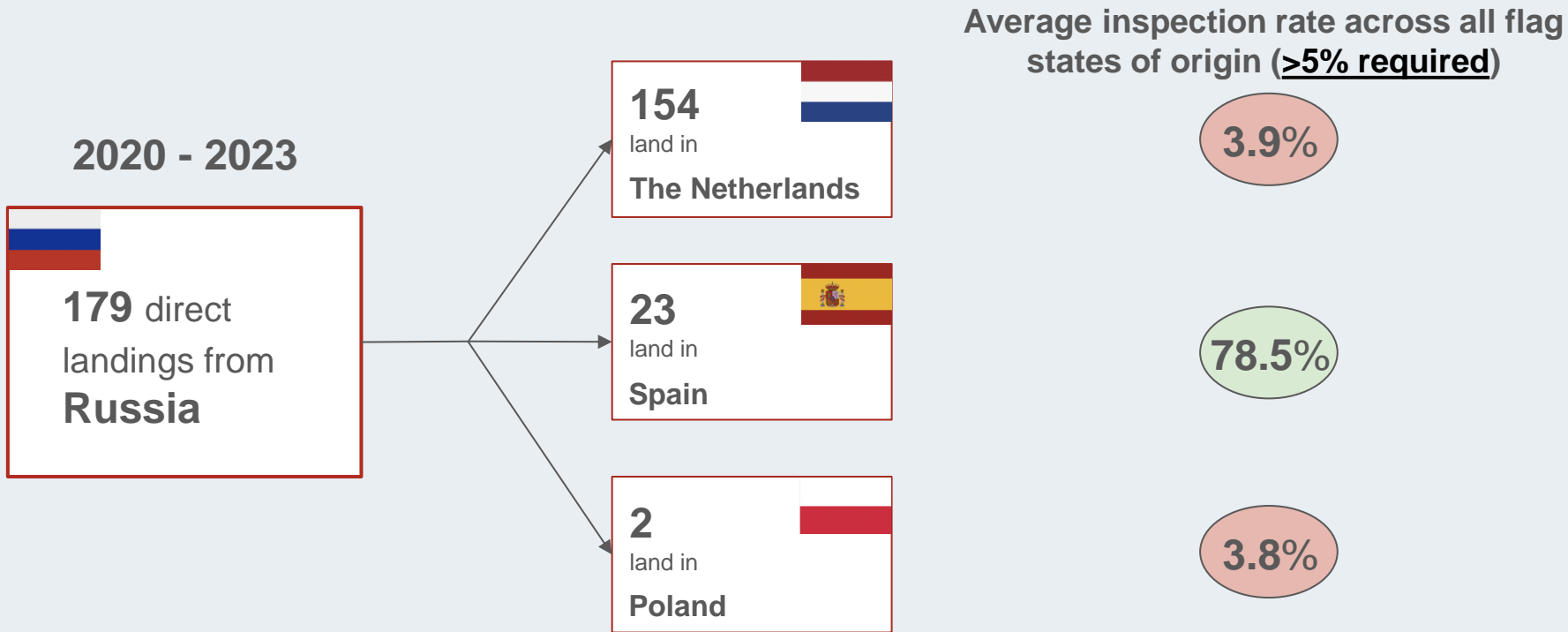
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- Some of the Member States that receive the most DL inspect below the legal minimum threshold of 5%



Case study: disparity in physical inspections between the Member States receiving Russian Direct Landings



Case study: disparity in physical inspections between the Member States receiving Russian Direct Landings



ECA demands the Commission take action to remedy disparity in import controls by 2026



Recommendations of the European Court of Auditor (2022 report)

By 2026, the Commission should:

- Pursue digitalisation → CATCH IT
- Uniform risk identification criteria → included in CATCH IT
- **Monitor that the scope and quality of checks by Member States are sufficient to address the risks, and take necessary actions to remedy any shortcomings**
→ CATCH IT alone will not suffice



A vibrant underwater scene featuring a massive school of small, silver fish swimming in clear blue water above a diverse and colorful coral reef. The fish are densely packed, creating a shimmering effect. The coral below is multi-colored, with shades of orange, yellow, green, and pink. The overall atmosphere is bright and lively.

Thank you for your attention