



Advice

Twentieth Session of the FAO's Sub-Committee on Fish Trade

Brussels, 20 August 2025

1. Background

In 1965, the United Nation's Food and Agriculture Organisation (FAO) established the Committee on Fisheries¹ as an inter-governmental forum to address issues related to fisheries and aquaculture. The Committee meets every two years in Rome, Italy.

In 1985, the Sub-Committee on Fish Trade² was established, under the Committee on Fisheries, as a dedicated platform for addressing post-harvest matters of fisheries and aquaculture, specifically the trade, economic, and market dimensions. The Sub-Committee aims to support the responsible and sustainable movement of these products across international markets. The Sub-Committees meet every two years, alternating with the sessions of the Committee.

The twentieth session of the Sub-Committee on Fish Trade will take place from 8 to 12 September 2025 in a virtual setting. The European Commission will prepare the mandate for the EU's position at the session. With the present advice, the Market Advisory Council (MAC) aims to contribute to the preparation of the mentioned mandate. As done on previous occasions, the MAC would like to be participate in the official EU delegation.

2. Outlook, Global Themes, and Cooperation with other International Organisations

2.1. Global Trends in Fisheries and Aquaculture

¹ <https://www.fao.org/cofi/en>

² <https://www.fao.org/cofi/fish-trade/en>

Global fisheries are confronted with numerous challenges, including climate change, ocean pollution, and inadequate fisheries management in certain regions. Despite these obstacles, the 2025 edition of the FAO's "Review of the state of world marine fishery resources"³ indicates that approximately 77.2% of the global fisheries landings come from biologically sustainable stocks when weighted by production levels. Concurrently, the global fish trade has faced significant disruptions from events such as the COVID-19 pandemic⁴ and Russia's war against Ukraine⁵.

At the international level, artisanal fishing fleets often face challenges in securing fair market access, particularly in the relationship with large retailers, which impacts the economic and social sustainability of fishing communities. Therefore, it is important that the EU and the FAO encourage international cooperation in the context of initiatives that promote a fair market and the sustainability of coastal communities, such as the Ibero-American Network of Small-Scale Artisanal Fisheries (RIPAPE)⁶, including through the provision of economic instruments for projects and exchanges of good practices.

Within the EU context, 70% of the consumed fishery and aquaculture products are imported from third countries⁷. The EU fishing sector encounters ongoing challenges, including generational renewal and heightened environmental requirements. Maintaining a profitable, economically viable, and environmentally sustainable fisheries and aquaculture sector is essential for the EU's economic and environmental future. At the international level, the viability of primary producers must be recognised as the foundation of any sustainable and traceable value chain.

³ [FAO, Review of the State of World Marine Fishery Resources \(2025\)](#)

⁴ [MAC Advice on "Impact and Mitigation of the COVID-19 Pandemic on the Seafood Supply Chain" \(December 2020\)](#)

⁵ [MAC Advice on "Disturbances in the market of fisheries and aquaculture products due to the Russian invasion of Ukraine" \(February 2023\)](#)

⁶ <https://ripape.org/>

⁷ [EUMOFA, The EU Fish Market \(2024\)](#)

Strengthening their resilience is key to securing the long-term integrity of fisheries and aquaculture supply.

Equally important is the EU fish importing and processing industry, which strengthens food systems, supports local economies, sustains employment, and enhances the Union's overall competitiveness. Due to the close interdependence of these sectors, they require balanced and coherent support.

As global demand for fishery and aquaculture products continues to rise, the EU supply continues to decline, partially driven by geopolitical disruptions and stringent EU policies, particularly affecting the availability of responsibly sourced and affordable products. Therefore, the EU market increasingly relies on a stable and sustainable supply from third countries. To secure competitive access to sustainable raw materials and international level playing field, it is vital for the EU to promote responsible fisheries management within Regional Fisheries Management Organisations (RFMOs) and other international platforms. At the same time, it is essential to work toward ensuring that imported products placed on the EU market progressively align with standards equivalent to EU production, particularly in terms of food safety, labour conditions, and environmental protection, in a realistic and collaborative manner. To support this, there should be a clear and consistent definition of what constitutes an acceptable level of compliance for non-EU operators, along with appropriate transition periods for third countries to adapt and align with EU requirements. This balanced approach would help maintain a level playing field, support responsible sourcing efforts by importers, and reinforce consumer trust, while avoiding unintended trade disruptions.

Integration into global supply chains contributes to resilience, innovation, and access to new markets. While open international trade offers clear benefits, these must be carefully weighed against the potential risks of unfair competitions. Challenges in the sustainability of fisheries and

aquaculture typically arise from a limited range of species, products and regions, and these should be considered and addressed effectively on a case-by-case basis. Effective, science-based production management has proven successful in many regions where it has been properly implemented. Allowing a limited number of cases to undermine confidence in the broader EU trade of fishery and aquaculture products would be unjustified and counterproductive, especially given the sector's strong commitment to decent work, safety, quality, and compliance. Recently adopted EU pieces of legislation, such as the Corporate Sustainability Due Diligence Directive⁸, the Forced Labour Regulation⁹, and the CATCH IT system¹⁰, will play a key role in ensuring that these standards are met. However, their implementation must be efficient, targeted, and fair. To avoid excessive administrative burdens, the FAO should recall that implementation should be targeted, risk-based, and proportionate, adapted to operational realities, particularly for SMEs and family-run fishing operations, who may face challenges in compliance without adequate support.

The global expansion of aquaculture presents an opportunity to strengthen food security, price stability, and supply diversification. At the same time, in many FAO member countries, wild capture fisheries remain essential for food sovereignty, nutrition, livelihoods, and marine ecosystem balance, and must continue to be supported through effective and science-based management. Rather than imposing trade restrictions, the EU should reinforce partnerships with likeminded producing nations to build resilient and sustainable supply chains. Given the impacts of global climate variability and geopolitical instability on market access and costs, the EU must pursue multilateral cooperation to prevent fragmentation of fishery and aquaculture markets and ensure continued stability.

⁸ [Directive \(EU\) 2024/1760 on corporate sustainability due diligence](#)

⁹ [Regulation \(EU\) 2024/3015 on prohibiting products made with forced labour on the Union market](#)

¹⁰ [Regulation \(EU\) 2023/2842 amending Fisheries Control Regulation \(EC\) 1224/2009](#)

The EU should promote:

- Development of environmentally, socially, and economically sustainable fisheries and aquaculture production and value chains;
- Recognition of the specific challenges faced by artisanal fishers and other small-scale operators, including through the promotion of international cooperation initiatives, such as the Ibero-American Network of Small-Scale Artisanal Fisheries (RIPAPE);
- Responsible fisheries management within Regional Fisheries Management Organisations and other international platforms;
- Safeguarding of human rights and community development, including promotion of fair labour conditions and support for the economic development of coastal communities;
- Strengthening international trade, underpinned by science-based production management as well as strong commitment to safety, quality, and compliance across the value chain;
- Multilateral cooperation; resilient and sustainable international supply chains;
- The use of ocean diplomacy to mobilise global support for the ratification and enforcement of fisheries-related international agreements.

2.2. Global Themes and Cooperation with other FAO Bodies and International Organisations

The EU market benefits from predictable, rules-based global trade frameworks facilitated by the EU, the FAO, including the Codex Alimentarius, the World Trade Organisation (WTO), among other international organisations.

Cooperation between the FAO and regional fisheries bodies should remain on strengthening capacity development, data sharing, and providing technical assistance, rather than promoting

trade barriers. However, care should be taken to avoid duplicative or parallel compliance systems that risk diverging from EU standards or creating disproportionate obligations for operators. Strong support should be given to re-regulating with exporting States with the aim of aligning sustainability objectives, while also persevering development potential.

The EU should promote:

- Predicable, rules-based global frameworks (e.g., FAO, Codex Alimentarius, WTO);
- Cooperation between the FAO and regional fisheries bodies, focusing on capacity development, data sharing, and technical assistance.

3. The Code of Conduct for Responsible Fisheries

3.1. Implementation of Article 11 of the Code of Conduct for Responsible Fisheries:

Features and Challenges

While the voluntary Code of Conduct for Responsible Fisheries was broadly signed by the international community, States do not always put in place the necessary means for its implementation. The necessary balance between primary producers and the post-harvest and trade practices is not always achieved. While operators make efforts to improve the marketing of fishery and aquaculture products, their interests, particularly of the artisanal ones, are not always accounted for in broader international agreements.

In the EU context, the implementation of Article 11 of the Code of Conduct presents both significant opportunities and notable challenges. The sector is committed to strict safety, quality and labelling standards, in line with EU legislation and international frameworks. In that effort, reliable traceability systems and close cooperation with exporters and authorities in third countries is needed to harmonise sanitary measures and certification programs. Trade should prioritise products from responsibly managed fisheries to help marine ecosystems. To maintain

trust and promote responsible trade, there should be transparency, regulatory compliance, and active engagement with stakeholders. Additionally, partnerships with exporting countries can enhance post-harvest handling and foster value-added product development, particularly in developing regions.

The diverse and complex nature of global fishery and aquaculture supply chains present challenges, including variations in third-country capacities and frequent regulatory changes. Furthermore, ensuring timely access to accurate data, balancing market access with conservation measures, and managing evolving trade rules requires continuous monitoring and adaptability.

To ensure a successful and responsible implementation of Article 11, the EU should establish mechanisms for cooperation within the FAO and with partner States, particularly in developing regions, to promote regulatory alignment and proactive risk management.

The EU should promote:

- Adequate balance between primary producers and post-harvest and trade practices, including in the context of broader international agreements;
- Reliable traceability systems and harmonisation of sanitary measures and certifications programs via close cooperation with exporters and authorities of third countries, including via the CATCH IT system;
- Trade prioritisation of products from responsible production: transparency, regulatory compliance; active engagement with stakeholders; partnerships with exporting countries, particularly in developing regions.
- Mechanisms for cooperation within the FAO and with partner States, particularly in developing regions, to promote regulatory alignment and proactive risk management.

4. Compliance, Competitiveness and Market Access

4.1. Food Safety and Quality for Aquatic Products

The MAC welcomes the FAO's work on food safety and quality of aquatic products and believes that the Commission should maintain the strong collaboration with the relevant international organisations, such as the FAO and the World Health Organisation (WHO), and their common body the Codex Alimentarius.

The harmonisation of international standards is essential to ensure that the fishery and aquaculture products, particularly the imported ones, placed on the EU market are safe and of high quality. EU operators, including small-scale ones, make significant efforts to ensure that their production methods protect the products, avoid food fraud and ensure food safety. Investments to increase food safety should be promoted to ensure safe consumption.

The EU should support the FAO and the Codex Alimentarius's efforts on the assessments related to the consumption of fishery and aquaculture products and promote access to reliable data on contaminants and nutrients. The EU should also promote digital tools for food safety checks, which would improve traceability and transparency, especially in developing countries.

To ensure fair competition, it is essential that all fishery and aquaculture products placed on the EU market, including processed products, comply with the EU regulatory requirements. The EU can strengthen its economic stability and safeguard its high standards by creating more favourable conditions for EU operators to process/manufacture raw materials for the European market. This would reduce the need for imports of finished products from countries whose production conditions might differ from those in EU. The EU should advocate for the FAO's leadership in developing practical standards and technical assistance to help exporters meet the EU's food safety and sustainability requirements, supporting a safe and reliable fisheries and aquaculture supply chain for EU consumers. The EU should also promote impact assessments

comparing the environmental footprint of wild capture fisheries and aquaculture production with that of alternative protein sources, to ensure that sustainability policies do not inadvertently favour higher-impact products.

The EU should promote:

- Strong collaboration with the relevant international organisations on food safety and quality for aquatic products, including on harmonisation of international standards;
- The effective compliance with EU regulatory requirements by all fishery and aquaculture products, including imported processed products, placed on the EU market;
- The FAO and Codex Alimentarius's efforts on the assessments related to the consumption of fishery and aquaculture products, on access to reliable data on contaminants and nutrients, and use of digital for food safety checks;

4.2. Transparency and Legal Provenance for Sustainable and Competitive Value Chains

Transparency must be paramount in commercial transactions of food products, particularly of fishery and aquaculture products due to their perishable nature. International cooperation should promote transparency and legal provenance, while also promoting sustainable and competitive trade.

As the EU CATCH IT system is set to become fully operational in 2026, the EU should promote, via the FAO, awareness and early adoption of the system by third countries exporting to the EU. The FAO's and guidance should align with the EU's import requirements, avoiding parallel or conflicting obligations. The sharing of best practices from the development and rollout of CATCH IT can further enhance the FAO's technical assistance and help exporting countries transition to efficient, interoperable digital systems.

The EU should promote:

- Strong transparency and legal provenance of fishery and aquaculture products via international cooperation, while also promoting sustainable and competitive trade;
- Adoption of the EU CATCH IT system by third countries, including through sharing of best practices, to ensure efficient and interoperable digital systems.

4.3. Sustainable Value Chains for Competitive Markets

The FAO plays a vital enabling role in the global trade of fishery and aquaculture products and corresponding governance system. The FAO supports the development of internationally recognised standards by providing scientific advice, technical guidance, and voluntary best practices for food safety, traceability, and responsible trade. In many third countries, resources are needed to improve post-harvest systems, traceability, labelling, and marketing, for the sector to progress towards sustainable and competitive markets. Though, EU assistance to capacity development efforts should be granted in a manner that preserves the competitiveness and viability of EU fisheries and aquaculture value chains.

The FAO plays a central role in promoting sustainable fisheries through the implementation of the Code of Conduct for Responsible Fisheries, support for RFMOs, and assistance to countries in improving fisheries governance, data collection, and conservation measures, among other initiatives. EU efforts to align FAO objectives with existing EU conservation and control frameworks can improve coherence while safeguarding sectoral wealth. Furthermore, the FAO delivers vital capacity development to developing countries, helping them comply with global trade requirements and participate in sustainable fisheries and aquaculture value chains.

The EU should maintain close collaborating with the FAO, including when updating its own regulatory frameworks, to promote coherence, scientific integrity, and fair market access, ensuring that trade policies are both sustainable and supportive of include economic growth.

The EU should recognise the strategic role of the entire fisheries and aquaculture value chain (primary producers, auctions, processors, traders, retailers) in ensuring a consistent flow of safe and high-quality food to consumers across the EU. As seen during the COVID-19 pandemic, this value chain represents critical infrastructure, ensuring food security even in times of crises.

While the EU fisheries and aquaculture sectors are vital, international trade is needed to support the diversity and continuity of consumption. The EU should promote realistic transition periods that allow partner third countries to progressively align with EU standards on sustainability, food safety, and traceability, without causing major trade disruptions. Therefore, the EU should support an open and rules-based international trade, as integration in global supply chains enhances resilience, especially in the face of geopolitical tensions and climate-related challenges. This includes ensuring that EU operators are treated as strategic food suppliers within the EU's aquatic food system and receive appropriate investment and policy attention. While trade tools are of utmost importance to defend sustainability and to protect EU interests and historical fishing rights¹¹, the EU should continue building on strategic autonomy, while only using protectionist policies for sensitive EU fishery and aquaculture products as to maintain global cooperation.

Sustainability requirements should be applied fairly and consistently across food sectors. Particularly as fisheries and aquaculture, more than other food sectors, are already subject to stringent sustainability, control, and reporting frameworks under EU law. Therefore, when

¹¹ https://oceans-and-fisheries.ec.europa.eu/news/commission-welcomes-landmark-agreement-combat-non-sustainable-fishing-practices-fish-stocks-common-2025-06-03_en

introducing new environmental or social conditions for imported fishery and aquaculture products, the same should be applied to other food products. A comparative review, standardisation and mutual recognition of international and major sustainability standards should be considered to prevent regulatory or specifications overlap (duplication), market distortion, or confusion.

When the EU introduces restrictions on imports of fishery and aquaculture products, it is necessary to consider unintentional increases in the EU's reliance on land-based animal proteins, which often have a higher environmental impact. Such an outcome would contradict the European Green Deal and the EU's goals for sustainable food systems. The EU policies on fisheries and aquaculture and on trade must balance sustainability, competitiveness, and supply chain resilience. Therefore, partnering with international organisations, such as the FAO, will be essential to maintain high standards while ensuring fair and inclusive global trade.

The EU should promote:

- The recognition of the FAO's global role in enabling global trade of fishery and aquaculture products, development of internationally recognised standards, implementation of sustainable production practices, and capacity development;
- The recognition of the strategic role of the fisheries and aquaculture value chain in ensuring food security, including in times of crises, as well as of international trade;
- Progressive alignment by partner third countries with EU standards on sustainability, food safety, and traceability, while avoiding major trade disruptions, via open and rules-based international trade;
- Fair and consistent application of sustainability requirements across food sectors, including via a comparative review of international and private sustainability standards.

4.4. The FAO Blue Ports Initiative: Advancing Sustainable Fisheries, Trade, and Coastal Development for More Competitive Products

The FAO Blue Ports Initiative aims at promoting and sustainably developing ports and fishing coves, contributing to social inclusion, competitiveness, environmental sustainability, and efficiency in a horizontal way. The Blue Ports Initiative closely aligns with the priorities of EU stakeholders to ensure high-quality, traceable, and sustainability sourced fishery and aquaculture products, while strengthening the resilience of international supply chains.

In the context of this initiative, around the world, further coordination could be achieved, for example to implement projects on management and on origin labelling. Greater coordination should be promoted via regional communities, such as RIPAPE, as well as funding.

Well-functioning port infrastructure and responsible development in partner countries is fundamental to maintain stable access to safe and sustainable products. The Blue Port Initiative's integrated approach to upgrading fishing ports, including improvements in cold storage, processing capacity, and food safety systems, is essential to raising product quality, reducing post-harvest losses, and promoting legal, ethical trade practices. These investments directly benefit EU operators and consumers by creating more secure and transparent supply chains.

The alignment of the Blue Ports Initiative with the United Nations's Sustainable Development Goals and the FAO's "Blue Transformation" strategy is welcomed. The initiative's focus on value chain reinforcement, gender equity, and environmental sustainability ensures that port modernisation not only supports trade but also advance social and environmental outcomes in coastal communities.

The European Commission should view the Blue Ports Initiative as a strategic investment in the EU's own food security, sustainability goals and market competitiveness. Co-investment and

policy alignment between the EU and FAO can help that third-country ports better meet the EU standards on food safety, traceability, and environmental protection, without creating trade distortions or barriers for developing countries.

Similarly, aligning the Blue Ports Initiative with the EU energy transition strategy is essential, with a focus on modernising ports to support fleet decarbonisation and energy-efficient operations. This includes investing in zero-emission energy infrastructure, integrating it into the grid, and expanding shore-side electricity connections for fishing vessels to reduce reliance on fossil fuels. The MAC recalls the importance to involve fisheries producer representatives in the roll-out and governance of initiatives such as the Blue Ports Initiative to ensure that operational realities are adequately reflected.

The EU should promote:

- The implementation of the Blue Ports Initiative, with the aim of ensuring high-quality, traceable, and sustainability sourced fishery and aquaculture products, and strengthening of international supply chains, in line with the EU market's requirements;
- Increased coordination and implementation of international projects, including through the involvement of regional communities, such as RIPAPE.

4.5. FAO Guidance on Social Responsibility in the Fisheries and Aquaculture Value Chains

The implementation of the FAO Guidance on Social Responsibility in the Fisheries and Aquaculture Value Chains is a critical step towards fostering fair, inclusive, and ethical aquatic food systems from the primary producer to the final consumer, while also promoting food security and nutrition. The guidance offers a practical and internationally recognised framework

to promote decent work, safeguard human rights, and strengthen social outcomes across the global fisheries and aquaculture value chain.

Eliminating all forms of forced and child labour, ensuring fair and safe working conditions, and upholding the principles of non-discrimination and freedom of association are essential responsibilities for all actors in the sector. These principles are not only central to international labour standards but also vital for long-term sustainability and supply chain resilience. In line with the UN guidelines, human rights due diligence is increasingly embedded in fisheries and aquaculture sourcing practices. Key elements include risk identification, supplier audits, transparent reporting, and ongoing engagement with business relationships to prevent, mitigate, and address labour-related risks.

Combating illegal, unreported, and unregulated (IUU) fishing is also closely linked to social responsibility, as IUU fishing practices often coincide with labour exploitation and human rights violations. Full traceability and legal compliance throughout the supply chain are fundamental to responsible sourcing, and global efforts, such as those led by the FAO, play an essential role in reinforcing these standards.

Importantly, fishing and coastal communities, particularly small-scale producers, are recognised as key partners in building socially responsible and sustainable food systems. Inclusive development approaches that support training, equitable partnerships, and integration of local knowledge contribute to both community resilience and the preservation of marine resources. Such an approach can also contribute to eradication of poverty. In small-scale artisanal fishers and aquaculture farmers communities, these activities are generally family businesses, which can be outside social protections (healthcare, education, social risks, retirement, ...).

The FAO's social responsibility guidance should be promoted as a global benchmark for best practice. Its effective implementation, supported by capacity development, clear tools, and

alignment with regional policies, such as those of the EU, can help ensure fair market access, improve livelihoods, and reinforce the long-term viability of fisheries and aquaculture food systems. In the view of the MAC, the FAO should be encouraged to more systematically involve the ILO in the formulation and monitoring of social policies related to the blue economy, including working conditions aboard fishing vessels, port labour, and gender equity in coastal communities.

The EU should promote:

- The implementation of the FAO Guidance on Social Responsibility in the Fisheries and Aquaculture Value Chains as a step towards fair, inclusive, and ethical food systems;
- Ratification and enforcement of key ILO conventions, particularly C188 – Work in Fishing Convention, to effectively progress on the elimination of forced and child labour, and ensuring fair and safe working conditions, and upholding the principles of non-discrimination and freedom of association;
- The fight against IUU fishing, while ensuring full traceability and legal compliance;
- The FAO’s social responsibility as a global benchmark for best practice.