



Mr. Ruben do Couto Farias
President of the Executive Committee of
CCRUP Açores-Portugal

Madrid, on the date of the electronic signature

Dear Mister do Couto,

After receiving and analysing the Recommendation No. 62 of CCRUP regarding the fight against illegal fishing in the Outermost Regions, even though we fully share its goal, we would like to make some observations on its content.

Regarding the paragraph about the INDNR fishing in the Canary Islands, we are disappointed in the fact of not being consulted beforehand, since we would have been able to give data and information that would have contributed to a more precise diagnostic of the situation.

In that regard, we consider that certain statements are made regarding the import operations of fishery products, as well as regarding the fight against illegal practices, that do not correspond to the official data available in this General Secretariat of Fisheries.

In this respect, we want to underscore that Spain is the international leader on the fight against illegal, unreported and unregulated fishing (INDNR) and it is the **only country of the European Union whose fisheries inspection system is certified under ISO 9001 since 2015** for the activities of inspection, control, and fights against illegal fishing.





We would also like to highlight that, **in their report of September 2022, the European Court of Auditors underlined the excellence of the system deployed by Spain.** (https://www.eca.europa.eu/Lists/ECADocuments/SR22_20/SR_Illegal_fishing_ES.pdf, table 1 page 24)

Furthermore, it must also be highlighted that, within this system, the *“Integrated Management System for INDNR Fishing Control (SIGCPI in Spanish)”* has been installed, which includes an electronic document verification system for catch certificates that allows to prevent and stop any imports of products originating from INDNR fishing. Once detected, these products are confiscated before entering the EU market through our country. A total of 45,000 certificates is reviewed and processed by this system every year.

This is why we find inadequate to draw general conclusions on isolated or unverified cases, like the alleged presence of vessels included in international lists of illegal fishing in the waters of the Canary Islands, taking into account that there is no record backing this circumstance.

With regard to recreational fishing, we would like to inform you that on July 31, a term for a public consultation was opened for the project of ROYAL RECREE THAT REGULATES THE MANAGEMENT MEASURES FOR FISHING RESOURCES, whose third Final Disposition introduces amendments regarding maritime recreational fishing in external waters, in line with the updates introduced by the Regulation (EU) 2023/2842 of the European Parliament and the Council, of November 22, 2023, in order to intensify the control and collection of data of this activity.





We are available to provide any other additional information that you may find necessary.

Finally, we would like to reiterate Spain's firm commitment with both the fight of illegal, unreported and unregulated fishing and the Autonomous Community of the Canary Islands, in recognition of its geographic singularity and its condition of Outermost Region.

Best regards,

