

Advice

EU Strategy for Fisheries External Action

Brussels, 17 November 2025

1. Background

The mission letter to Commissioner Kadis¹ foresees the development of “a strategic approach to our fisheries external action, including by ensuring that Europe retains its international leadership with its zero tolerance approach to illegal, unreported and unregulated fishing” and that, as part of this, work will be done on “a new generation of Sustainable Fisheries Partnership Agreements, ensuring they are in line with our wider regional strategies and priorities, most notably for Africa and the Indo-Pacific”, while also promoting “a coherent approach for sustainable fisheries in all multilateral fora and bilateral dialogues”.

The letter also foresees “action to uphold a level playing field and protect the European fisheries chain from unfair global competition, notably on seafood products”. As part of the Commissioner’s mission, a “strategic approach for an EU ocean diplomacy” will also be developed, while aiming to ensure that “Europe leads the way on international ocean governance”. Similar commitments are made under the European Ocean Pact², which states that “the Commission will prepare in 2026 a Communication on a new strategic approach to EU fisheries external action in which it will outline these EU efforts. The approach will aim at closing gaps in global fisheries governance and reinforcing the EU’s commitment to sustainable ocean stewardship”.

¹ https://commission.europa.eu/document/028ce7d5-e328-4416-8f0d-35c8884acaa8_en

² [Communication from the European Commission on “The European Ocean Pact” \(5 June 2025\)](#)

On 7 July 2025, the European Commission published a call for evidence on the initiative “EU Strategy for Fisheries External Action”³, which will aim to set out a strategy approach as well as steps on how to ensure a level playing field and protect the European fisheries chain from unfair competition. Several of the topics expected to be covered by the communication, such as sustainable value chains and trade, fight against illegal, unreported and unregulated fishing, and the market contribution of the next generation of Sustainable Fisheries Partnership Agreements, fall under the area of competence of the MAC.

2. Problems the initiative aims to tackle

2.1. Developments over the past decade

The world has changed over the past decade and the EU’s role on international ocean governance is increasingly important. The EU market has a high dependency on imports of fishery and aquaculture products and on shared fisheries stocks. At the same time, the world faces geopolitical tensions and increased competition as well as challenges related to marine spatial use and climate change. Therefore, the EU external fisheries strategy should contribute to increased coherence, proactivity, and effectiveness, while aligning with the objectives of the Common Fisheries Policy (CFP), including long-term science-based fisheries management on the basis of independent scientific advice.

While the EU cannot impose its own regulations to third countries (e.g., landing and transshipment rules, control rules), the CFP Regulation includes a range of tools, from market-based measures to regional cooperation frameworks, aimed at promoting improved international ocean governance and sustainable value chains. While progress has been made, collaboration with non-EU countries on fisheries management and ocean governance varies, and additional measures

³ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14633-EU-strategy-for-fisheries-external-action_en

are needed to ensure the sustainability of certain non-EU fleets. Therefore, the EU should take action that contributes to improve international fisheries management, creates a level playing field, tackles IUU fishing, and meets international targets and objectives, including through effective implementation of EU import control rules across Member States⁴.

EU action should aim to reduce the dependency on fishery and aquaculture products from third countries, address the imbalance in the level playing field between EU and non-EU operators, support fisheries management to rebuild fish stocks which would allow to strengthen production and food security – including catches in non-EU waters. The EU should also continue efforts to promote sustainability, fair competition, and better governance in external fisheries. When engaging with third countries, for example through trade agreements, Regional Fisheries Management Organisations (RFMOs), and bilateral partnerships (e.g., scientific stock assessments, fisheries management, fair labour practices, traceability), the EU can contribute to overall improvements in the quality, legality, and long-term reliability of the supply of fishery and aquaculture products with benefits for both local communities and EU consumers. Therefore, the EU should ensure coherence across trade, environment, development, and fisheries policies. There should also be coherence with broader regulatory frameworks, such as the Corporate Sustainability Due Diligence Directive and the Forced Labour Regulation.

At the same time, the challenges faced by market operators, particularly SMEs, should be recognised. Increases in sustainability and due diligence requirements can lead to complex compliance obligations, higher costs, and potential trade disruptions, especially when supplier countries face difficulties in meeting new requirements. The situation is further complicated by the lack of universally agreed definition of “sustainability”, which leads to varying interpretations across regions and regulatory systems. In the EU, the progress towards achieving maximum

⁴ [MAC-LDAC Advice on “Urgent need for effective implementation of EU import control rules across Member States” \(27 June 2025\)](#)

sustainable yield (MSY) is ongoing and varies across different fisheries. This highlights the complexity of applying uniform standards to external partners and reinforces the need for a fair, flexible, and context-specific approach in promoting sustainability globally. Overall, the EU must uphold its high environmental standards on EU production and on products placed in the EU market, including those originating from third countries.

The MAC unequivocally supports the exclusion of products tainted by illegality from the EU market. Beyond such products, it is noted that tighter import conditions or additional requirements may limit sourcing options and flexibility, and induce more administrative burden and complexity for importers. If there is a reduction in the access to fishery and aquaculture products in the EU market, the resulting protein gap may be filled by increased consumption of land-based proteins, which have a different, and sometimes higher environmental and carbon footprint than some seafood options currently available in the market⁵. When assessing the impact of this potential shift, broader sustainability goals, including climate and biodiversity objectives should be evaluated. Therefore, a balanced and pragmatic implementation of the EU's external fisheries action is essential. It should uphold high environmental standards, while supporting realistic transitions, safeguarding EU food security (with due respect for food security in other countries), and ensuring continued access to marine proteins, as part of a resilient food system. Additionally, in international fora, such as the Food and Agriculture Organisation (FAO) of the United Nations, the EU should promote worldwide food security.

Ahead of possible legislative changes to the EU's external fisheries policy, particularly those affecting trade flows, the MAC asks for comprehensive impact assessments to understand the broader consequences for EU food systems but also for access to third countries aquatic protein, trade dynamics, and the availability of nutritious and low-emission protein sources. Moreover,

⁵ [MAC Advice on "Health and Environmental Value of Seafood" \(8 October 2021\)](#)

the pace of implementation should be accounted for. Rapid regulatory changes without sufficient time for adaptation or capacity development – both in the EU and in third countries – can strain supply chains and create uncertainty in the market.

2.2. Challenges in the sustainable fisheries management at international level

a) Regulating of public subsidies and incorporation of social issues

The EU should continue to take a leadership role in the promotion of science-based fisheries management at the international level. This includes supporting robust stock assessments and ensuring that management decisions are based on the best available scientific evidence. By promoting data-driven approaches, the EU can help improve the long-term sustainability of global fish stocks while also reinforcing trust and stability in trade relationships. In that context, it is important to consider the threats to sustainability caused by unilateral and uncoordinated quota decisions on shared stocks. Therefore, the EU should also take the lead in negotiations with coastal States to achieve comprehensive and science-based sharing agreements.

Eliminating forced labour across the fisheries and aquaculture supply chain is crucial. The recently adopted Forced Labour Regulation strengthens the EU's ability to prohibit products made with forced labour, including fishery and aquaculture products, from entering the internal market⁶. Ensuring decent working conditions across the fisheries and aquaculture supply chain is also crucial. Therefore, the EU should lead global efforts to promote binding standards on social responsibility, including on forced labour and decent working conditions, across RFMOs and initiatives of the FAO⁷. To be effective globally, and although labour practices, wages, and working hours vary significantly across regions globally, these efforts should be implemented in

⁶ [MAC Advice on “Forced Labour in the Fisheries and Aquaculture Market” \(30 November 2023\)](#)

⁷ [MAC Advice on “Twentieth Session of the FAOs Sub Committee on Fish Trade” \(20 August 2025\)](#)

collaboration with partner countries and RFMOs, taking into account regional contexts, while respecting and endorsing core labour rights and international standards.

The adoption of international agreements, such as the International Labour Organisation (ILO)'s Convention 188 and the Port State Measures Agreement (PSMA), can further contribute to improving the sustainability and social responsibility of global fisheries. These frameworks provide important guidelines for ensuring decent working conditions and combating illegal, unreported and unregulated (IUU) fishing, which are critical for building transparent and traceable supply chains. These agreements set a universal baseline for decent working conditions and transparency in fisheries and aquaculture supply chains. While some third countries may face capacity constraints in implementing them, this should be addressed through EU technical and financial support for ratification, enforcement, and capacity development, to help partner countries meet expectations.

In the view of EJF, Europêche and Oceana, when adopting international agreements, the ILO's Convention 188 should serve as the minimum standard on social responsibility. On the other hand, in the view of Conxemar and SNCE, requiring Convention 188 as a minimum might not be fit for purpose, and could hinder environmentally and socially sustainable protein from entering the EU market. These members highlight that just over 20 countries have ratified the Convention and that several high-income countries with robust labour legislation, such as the USA, Canada, Australia, and New Zealand, have not ratified it due to various reasons.

The European Commission should ensure coordinated action among the relevant Directorates-General, particularly DG TRADE and DG EMPL, in addition to DG MARE, to effectively address trade, labour, and sustainability dimensions of fisheries and aquaculture supply chains. The Social Partners for Sea Fisheries should also be fully involved in all initiatives related to working and living conditions in the fishing sector. The EU's market power should be leveraged to raise the

bar on social rights and working conditions. In the case of free trade agreements, conditionality on sustainability should be reinforced, including through mandatory requirements to implement core ILO Conventions. Additionally, the ongoing initiative on the integration of sustainability criteria under the regime of Autonomous Tariff Quotas for certain fishery products should also be taken into account⁸.

b) Dissemination and strengthening of action against IUU fishing

The EU, having positioned itself as a global ocean leader, must continue to take decisive action to chase and eradicate occurrences of illegal fishing and human rights abuses in the fisheries sector. The EU's framework against IUU fishing must be further strengthened. Therefore, the EU should continue to support non-EU countries to enhance transparency, reinforce their anti-IUU frameworks, and tackle the key enablers of IUU fishing. The EU should maintain the highest standards at home by ensuring full compliance by Member States, strengthening controls, particularly on imports, and applying rigorous due diligence in relation to suspected IUU cases involving EU vessels and nationals. Additionally, the EU should implement strong market actions against fishery products produced using or associated with forced labour. The EU market measures should be evidence-based, ensuring due process.

The EU must maintain and expand on the current “zero-tolerance” approach to IUU fishing. The upcoming CATCH IT system, which should be promoted internationally, along with other relevant regulations, is expected to improve traceability and transparency throughout the fisheries and aquaculture supply chain, helping to identify and exclude IUU products from the market. For third countries with limited digital or technological capacity, EU support in the form of training, infrastructure investment, and technical cooperation is essential. Capacity development should

⁸ [MAC Advice on “Integration of sustainability criteria under the regime of Autonomous Tariff Quotas for certain fishery products” \(28 April 2025\)](#)

be at the core of EU external engagement, ensuring that all actors, including SMEs, can benefit from the trade of fishery and aquaculture products.

The EU's "IUU carding system" remains a critical enforcement tool that must maintain its deterrent effect. The issuance of "red or yellow cards" should remain evidence-based and free from geopolitical interference, avoiding cases where political considerations and diplomatic sensitivities may deter the EU from issuing a "card". Furthermore, sufficient human resources should be allocated to the Commission units responsible for the monitoring and enforcement of the fight against IUU fishing, to enhance capacity and responsiveness.

The recently adopted Corporate Sustainability Due Diligence Directive is expected to encourage companies to strengthen their practices for verifying the legality of their seafood sources. Moreover, the EU's legal framework has tools to address non-cooperation by third countries in the sustainable management of shared fish stocks. Under Regulation (EU) No 1026/2012, the EU is empowered to adopt restrictive measures, including trade sanctions, against countries that fail to cooperate in the conservation and management of shared stocks.

Overall, the EU should uphold strong standards and regulations, while prioritising effective implementation, coordination, and enforcement of the existing rules, such as the IUU Regulation, the Forced Labour Regulation, the Corporate Sustainable Due Diligence Directive, and Regulation (EU) No 1026/2012.

2.3. World Trade Organisation's Agreement on Fisheries Subsidies

The World Trade Organisation (WTO)'s Agreement on Fisheries Subsidies (Fish 1) is a positive step to level the playing field by promoting sustainable fisheries management globally. By addressing harmful subsidies that contribute to overfishing and illegal fishing activities, the

agreement supports efforts to ensure that seafood products placed on the markets are sourced responsibly and sustainably.

The implementation of the agreement should be carefully managed to avoid penalising legitimate support for sustainable fisheries. The EU should advocate for the recognition of subsidies that promote sustainability, innovation, or social cohesion. The agreement should also avoid unfair asymmetries between EU and non-EU operators. Implementation challenges are likely to occur, as enforcement and compliance may vary between countries. Monitoring and verifying subsidy practices in complex global supply chains can be difficult. Therefore, the EU and the WTO should provide technical assistance to low-income countries, while also promoting a fair and transparent approach. Clear guidance and practical tools should be available to operators, including importers, to minimise risks.

The agreement will set the minimum framework to be respected by all nations. In this regard, the EU should introduce *force majeure* provisions to allow aid in exceptional and unforeseen circumstances (e.g., COVID-19 pandemic, Russia’s war of aggression against Ukraine), set a minimum common denominator of subsidy scrutiny applicable to all parties – with possible enhanced level of scrutiny on major fishing parties, and the establishment of a common definition of “artisanal fishing” to avoid deceptive practices, including potential deceptive classifications of industrialised fleets by some low-income countries.

2.4. EU international fisheries relations

EU international fisheries relations cover many areas, from trade and development to neighbourhood policy and foreign affairs, presenting both opportunities and challenges to the EU fisheries and aquaculture supply chain. Achieving coherence between internal and external fisheries as well as across related policy areas remains a persistent and ongoing challenge. Coherence between fisheries diplomacy and broader EU policies, such as the Clean Industrial

Deal, the Competitiveness Compass, trade arrangements, or human rights initiatives, is essential. Therefore, efforts should be made for better alignment between the mentioned policies.

The EU IUU Regulation has allowed the EU to stop seafood products that have been fished in an illegally, unregulated, or unreported manner from entering the EU market. This allows the EU to require traceability and proof of legality from non-EU States. In addition, trade agreements and efforts in regional partnerships, including RFMOs, aim at setting higher standards for fisheries and aquaculture management and traceability. This aims to ensure the legality and reliability and can improve the overall quality of the products placed on the market, while making supply chains more transparent. Stable agreements with partner countries help ensure steady access to marine products. Nevertheless, EU trade and fisheries policies must be aligned and complement each other to, among other aspects, ensure that trade arrangements effectively address concerns related to IUU fighting and human rights abuses/forced labour.

The complexity of overlapping policies can create challenges for operators. Although sustainable sourcing requirements are a foundation for long-term market stability and are meant to guarantee long-term access to affordable, fair and sustainable fishery and aquaculture products, their implementation might increase administrative burden, and operational costs, particularly for SMEs. Therefore, the EU should aim to accompany tighter rules with clear guidance and capacity development for processing and trade operators, particularly SMEs, and partner countries. Limitations in supply options due to higher administrative burden faced by third countries or price increases could limit the consumer access to affordable fishery and aquaculture products, and a decrease in aquatic protein could negatively impact the EU consumer diet, particularly of lower income households.

Overall, the EU's external fisheries policies should maintain high standards, while also considering trade realities and EU food security (without compromising food security in other countries). Fair

competition should be supported by ensuring that imported fishery and aquaculture products meet environmental, social, and safety standards equivalent to EU production, 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. Currently, inconsistencies allow products from third countries into the EU market that would not comply with CFP rules if produced domestically, creating an uneven playing field. While the EU's broad approach to improve ocean governance is necessary, efforts should be focused on sustainable management and exploitation of marine resources, as thriving global fish populations help ensure a steady and sustainable flow of fishery and aquaculture products into the EU market. The management measures should be clear and consistent, and efforts should be made to support partner countries and businesses. Actors along the supply chain should be consulted on the management measures to ensure that the policies are effective, workable and deliver on their objectives of sustainability, fairness, and transparency.

2.4.1. Joint Ventures in Fisheries

Despite being funded primarily through private capital and operating outside traditional EU funding instruments, Joint Ventures in Fisheries (JVs) should be recognised as part of the EU's external dimension and of the external fisheries policy⁹. Through operations in third countries with sovereign fishing rights, when well implemented, JVs can help secure access to marine

⁹ It is worth recalling that advice from the Long Distance Advisory Council (LDAC) recommends that, in order to access funding under EU programmes, JVs should have to be registered in a Member State or EU level register of JVs, or added to the SMEFF's authorisation register. This would allow ship-owners involved in JVs to be identified as a joint enterprise under foreign law and as an EU company (or individual) participating in the JV. In this manner, their vessels would appear in a register, an approach that could generate a positive return in terms of recognition or of support set out in the external dimension of the CFP. See [LDAC Advice on "Transparency in Joint Ventures" \(May 2025\)](#).

resources and can help the local economy, while also providing the opportunity to promote sustainable management and increased social standards¹⁰.

3. Aims of the Strategy

3.1. Strengthening social sustainability

The EU should ensure to that all fishery and aquaculture products placed on the EU market, regardless of origin, comply with environmental, sanitary and fair labour standards. As mentioned above, 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. Fostering labour standards, for both EU and non-EU supply, requires a coordinated approach involving national authorities, stakeholders, and international bodies. The EU should support capacity development and technical assistance programmes to help partner countries improve working conditions and implement effective monitoring and enforcement systems.

There should be a clear implementation of the Forced Labour Regulation through a targeted, risk-based approach, prioritising high-risk countries and sectors. Under the new Regulation, the Commission will lead investigations conducted outside EU territory, while, within a Member State, the competent national authority will take the lead whenever risks are identified. Therefore, the Commission should build the necessary operational capacity and actively engage stakeholders, including Advisory Councils and the Social Partners in Sea Fisheries, to support both the Commission and Member States in combating forced labour wherever and whenever required. The new rules should reinforce EU consumers' confidence that the products they purchase are ethically sourced. Clear guidance and practical tools should be developed to assist

¹⁰ [Fernández-Jardón, C. M., & Martínez Cobas, F. X. \(2023\). Estimation of the economic and social impact of Spanish joint ventures in fisheries, Vigo Free Trade Zone Consortium, University of Vigo](#)

operators carry out due diligence, including for the fisheries and aquaculture sector, as well as transparent supply chain traceability and verification mechanisms to identify and address risks related to forced labour.

The forthcoming criteria for the Corporate Sustainability Due Diligence should give substantial weight to forced labour risks in fishery and aquaculture supply chains, reinforcing coherence between trade, sustainability and human rights objectives. SMEs, including family-run businesses, should be supported in compliance. Furthermore, capacity development with third countries is key.

Internationally recognised standards on social and labour conditions should be incorporated across the fisheries and aquaculture value chain. The promotion of the adoption of these standards can strengthen the EU's approach to ensuring social sustainability for both EU and non-EU supply. Greater alignment with international instruments, such as ILO Convention 188, can help reinforce key labour rights, including those related to crew safety, onboard working conditions and living conditions, fair wages, disembarkation rights, and adequate rest periods. Commitments, implementation and enforcement of international frameworks for EU partner countries / the EU, together with EU social and environmental regulations, can help ensure that imported fishery and aquaculture products are not linked to forced labour. They also support the efforts of national authorities in verifying compliance across a wide range of social criteria. Their integration would be a value step forward preparing for the implementation of the Forced Labour Regulation. To be effective globally, and although labour practices, wages, and working hours vary significantly across regions globally, these efforts should be implemented in collaboration with partner countries and RFMOs, taking into account regional contexts, while respecting and endorsing core labour rights and international standards.

Additionally, the recognition and uptake of voluntary certification schemes that evaluate social performance can provide EU operators and national authorities with credible tools for verifying compliance with social sustainability requirements.

3.2. Strengthening economic sustainability

a) Building more sustainable value chains through trade and marketing rules of aquatic foods (imports and exports)

The EU should ensure, in a progressive manner, imports of fishery and aquaculture products with equivalent environmental and production regulatory requirements to those applied within the EU, with particular attention to products that currently fall short of these standards. Reinforced production and border measures, including strengthened controls, help safeguard fair competition and ensure a level playing field for EU operators.

To strengthen economic sustainability in the fisheries and aquaculture sector, the EU should develop a more inclusive and coherent strategy that fully integrates imported products, which account for approximately 70% of the EU's total apparent consumption. External supplies play a significant role in ensuring fishery and aquaculture products on the EU market, maintaining dietary diversity, and the competitiveness of the EU trading and processing industry.

The EU can promote sustainable value chains by ensuring respect for the objectives and the concept of sustainability, covering the three pillars of sustainability, foreseen in the CFP Regulation (Article 2.1), in the context of trade preferences, for instance GSP+ and Autonomous Tariff Quotas. Traceability and digital systems can improve transparency, even though administrative costs should be balanced. The recognition of third-country efforts and private certifications can help avoid duplication and complexity.

Market transparency can also be enhanced through consumer information¹¹ and the promotion of informed choices. Consumer information should be accessible, meaningful, and standardised. Providing consumers with clear and reliable information on how and where their aquatic food was produced supports informed decision-making, raises awareness and social impacts, and favours demand for responsibly sourced products. This approach rewards sustainable producers and contributes to a fairer, more accountable global trade (even though the implicit costs on the affordability of fishery and aquaculture products should also be taken into consideration).

b) Implementation of leverages at multilateral, bilateral and autonomous levels to enhance a level playing field

Throughout the various levels, a coordinated approach across the European Commission (DG MARE, DG TRADE, DG AGRI, DG SANTE) and other EU institutions is essential to ensure that fishery and aquaculture products are treated as a strategic food commodity, in line with EU environmental and food security objectives.

At the bilateral level, trade instruments play an important role in ensuring stable and competitive access to raw materials. Trade agreements should include enforceable sustainability clauses, with such provisions accompanied by clear guidance, well-defined compliance levels, and sufficient time for third-country operators to adjust. At the multilateral and bilateral levels, the EU should continue promoting responsible fisheries management through active engagement in RFMOs, while also advocating for improved labour conditions and human rights protections. At the multilateral level, the EU should advocate for reciprocity in standards. External action should strike a careful balance between advancing sustainability and supporting economic development in partner countries, particularly in coastal communities dependent on fisheries for livelihoods.

¹¹ [MAC-AAC Recommendation on “Consumer information on fishery and aquaculture products, particularly in the context of the HORECA Sector” \(23 October 2024\)](#)

At the autonomous level, the EU should ensure that the impact of internal rules (e.g., landing obligation, fisheries control measures) is balanced, while also striving to create a level playing field with the EU standards for products that are produced in non-EU countries. The CFP should explicitly aim to preserve environmentally, economically, and socially sustainable EU production capacity and a strong international governance arm, which includes access to fisheries territories, while trade policy should reinforce this with fair import and export conditions.

According to the FAO¹², globally, in 2021, the proportion of marine stocks fished within biologically sustainable levels was estimated to be 64.5% with 35.5% of stocks classified as overfished. When weighed by their production levels, approximately 77.2% of the fishery landings were estimated to be from biologically sustainable stocks. At a regional level, sustainability rates vary, particularly depending on the management efforts in place, demonstrating the importance of strong management systems¹³. In general, the EU fisheries and aquaculture supply chain, through stringent regulatory, safety and traceability requirements as well as voluntary initiatives and sourcing policies, focuses on sustainably sourced products. Therefore, while emanating from inherently complex international supply chains, many imported products do originate from sustainable, ethical and well managed production. In the context of a resilient and sustainable EU food system, a balanced and evidence-based approach should be taken, avoiding undermining the credibility of responsible businesses supplying from such production.

3.3. Promotion of enhanced global fisheries governance and continued upholding of the rules-based multilateral maritime order

¹² [Sharma, R., Barange, M., Agostini, V., Barros, P., Gutierrez, N.L., Vasconcellos, M., Fernandez Reguera, D., Tiffay, C., & Levontin, P., eds. 2025. *Review of the state of world marine fishery resources – 2025*. FAO Fisheries and Aquaculture Technical Paper, No. 721. Rome. FAO.](#)

¹³ Northeast Pacific (Area 67): 92.7%, Southwest Pacific (Area 81): 85.5%, Mediterranean and Black Seas (Area 37): 35.1%, Southeastern Pacific (Area 87): 46.4%, Eastern Indian Ocean (Area 57): 72.%, Eastern Central Atlantic (Area 47): 33.3%

a) Integrity of the Law of the Sea

The EU should continue promoting the United Nations Convention on the Law of the Sea (UNCLOS) as the foundation for global ocean governance, guaranteeing legal certainty and respect for international rules and conventions.

The European Commission can ensure the integrity of the Law of the Sea by ensuring full compliance with UNCLOS in all EU policies and international agreements, ensuring that EU market access and fisheries partnerships reflect its principles. This includes a failure to implement the “genuine link” between the fishing vessel and the owner, which should be better implemented by EU Member States and partner countries. The Commission should strengthen the role of UNCLOS in international and regional bodies to support science-based ocean governance, opposing actions that undermine the convention. The Commission should ensure consistency across trade, environment, and maritime policies. The Commission should support and transpose global initiatives, such as the Agreement on Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement) and new decisions of the Conference of the Parties of United Nations Climate Change Conferences (COP), and ensure that RFMOs are included in the decision-making process, and do not undermine the EU fisheries policies.

Furthermore, there should be support for partner countries to develop their capacity, including fisheries monitoring and enforcement, to meet international obligations, further reinforcing the rules-based international maritime order.

b) Retaining the EU’s international leadership with a zero-tolerance approach to IUU fishing and promotion of EU fisheries control rules globally

The EU should maintain a “zero-tolerance” approach to IUU fishing. The EU should actively engage and coordinate with international partners and RFMOs to promote the adoption of

similar standards worldwide, including catch certification systems. The EU should leverage trade policies to incentivise compliance, including conditioning market access on adherence to anti-IUU measures. Enforcement should be predictable, proportionate, and supported by dialogue. The new control rules should be rolled out with clear timelines and guidance to allow compliant supply chains to continue.

The EU's IUU "carding system" remains one of the most powerful and innovative tools in the global fight against IUU fishing. By publicly evaluating third countries' efforts to combat IUU fishing and issuing warnings or sanctions where governance is lacking, the EU has driven substantial fisheries reforms worldwide. Since its establishment, the scheme has prompted numerous countries to adopt stronger legal frameworks, enhance enforcement capacity, and invest in monitoring systems to retain access to the EU market. However, to maintain its credibility and leadership, the EU must ensure that the "carding" mechanism is applied rigorously, consistently, and without geopolitical bias. Major fishing nations with systemic compliance failures, regardless of their political or economic weight, should be held to the same standards as smaller or low-income States. Failing to act decisively in such cases undermines the legitimacy and credibility of the entire system and reinforces perceptions of unequal treatment.

To multiply the global impact of the EU's "carding system" and prevent the displacement of IUU products to non-EU markets, the EU should promote international alignment of IUU enforcement mechanisms. The EU should particularly intensify cooperation with major seafood importers¹⁴, such as the USA and Japan, to develop a common approach to market conditionality. While these partners share the EU's interest in keeping IUU-derived products out of their markets, they currently lack equivalent country-based sanctioning systems. Therefore, the EU should push for

¹⁴ [MAC Advice on "Better Alignment of Import Control Schemes in Major Market States" \(28 September 2020\)](#)

the adoption of similar mechanisms and establish frameworks for sharing intelligence on third-country performance.

The implementation of the IUU Regulation should be strengthened across all Member States to ensure that catch certificates and direct landings are properly verified, especially when originating from high-risk flag States or countries facing “yellow cards”. In the period of 2020 to 2023¹⁵, there were persistent failures by Member States to investigate high-risk imports, particularly a lack of verification requests to exporting third countries to confirm catch certificate details. Moreover, import refusal rates remain strikingly low across the EU. Therefore, the European Commission should uphold its role as guardian of the Treaties and hold Member States accountable, including through potential infringement procedures.

The EU leadership in the fight against IUU fishing also requires addressing the fundamental challenge of opaque ownership in relation to vessels supplying the EU market. While flags indicate where fishing vessels are registered, they reveal limited information about who ultimately owns or profits from fishing activities. A significant proportion of large-scale fishing vessels lack transparent ownership data¹⁶, with many owned by entities in countries different from their flag States. These deliberately opaque ownership structures enable operators to shift flags, rename vessels, and change jurisdictions to avoid scrutiny, sanctions and accountability, leaving enforcement efforts to target only front companies or crews while real beneficiaries remain beyond reach.

Global vessel transparency is a core pillar of any effective strategy against IUU fishing. The FAO Global Record of Fishing Vessels is the primary international platform designed to consolidate

¹⁵ [MAC-LDAC Advice on “Urgent need for effective implementation of EU import control rules across Member States” \(27 June 2025\)](#)

¹⁶ [Kinds, A., Relano, V., & Villasante, S. \(2025, May\). Beyond the Flag State Paradigm: Reconstructing the World’s Large-Scale Fishing Fleet through Corporate Ownership Analysis. The Outlaw Ocean Project / Oceana](#)

and share vessel identity and ownership information across jurisdictions. Despite its strategic importance, participation in the Global Record remains limited, and data coverage, especially on beneficial ownership and vessel history, is incomplete and inconsistent. Therefore, the EU should lead a renewed global push for full and meaningful engagement with the Global Record.

The EU should pair its control efforts with capacity development in third countries, helping trading partners to meet evolving standards, including through the promotion of CATCH IT. Transparent, evidence-based “carding” processes also reinforce credibility and global influence. Continuous diplomatic efforts and public communication will further position the EU as a global leader in sustainable fisheries governance.

c) Tailor-made regional approaches and maritime regions of focus

EU external action should be tailored to regional realities and recognise that, worldwide, 64.5% of all fishery stocks are estimated by FAO to be exploited within biologically sustainable levels and that, when weighted by production levels, stocks classified as biologically sustainable are estimated to account for 77.2% of the total landings¹⁷. Best practices from companies that are committed to sustainability, safety, and regulatory compliance should be shared to enhance the reputation of the sector and help ensure that the number of overfished stocks and illegal fishing further declines.

d) Role of a new generation of Sustainable Fisheries Partnership Agreements

SFPAs are included in the 20% of catches made outside EU waters and contribute to the supply of seafood to the EU market as well as to local markets. Since the EU is a deficit market for fishery products, in combination with improving the state of fish stocks in EU waters, the opening up of

¹⁷ [Sharma, R., Barange, M., Agostini, V., Barros, P., Gutierrez, N.L., Vasconcellos, M., Fernandez Reguera, D., Tiffay, C., & Levontin, P., eds. 2025. *Review of the state of world marine fishery resources – 2025*. FAO Fisheries and Aquaculture Technical Paper, No. 721. Rome. FAO.](#)

fishing grounds for the EU external fleet and of trade opportunities for non-EU countries to potentially export to the EU can be considered useful provided it is done sustainably. In-country capacity development through SFPAs, and more particularly their “sectoral support” component, can help partner countries develop their local markets and potentially gain access to the EU market, while enhancing their skills on sustainability management.

Under the present generation of SFPAs, there have been consistent concerns around the limited transparency of agreements, weak enforcement of sustainability clauses, and a failure to ensure meaningful benefits for local communities and economies¹⁸. The new generation of SFPAs¹⁹ should ensure a level playing field for EU operators, while supporting the long-term viability of the fleet and contributing to responsible food systems as well as food security for the EU and the partner countries.

Assistance to third countries should be conditional on clear, measurable progress, while avoiding the creation of loopholes that could undermine the competitiveness of EU operators. The scope of “Blue Funds” should be expanded in the new generation of SFPAs to include concrete support for training, processing, audits, and labelling, with a focus on strengthening supply capacity towards the EU market. Stakeholders, including local communities, should be directly involved in designing these agreements to ensure their practical operability and effectiveness.

New SFPAs can serve as platforms not only for access, but also for cooperation on stock management, transparency, and social standards, contributing to both transparent supply chains and long-term sourcing stability. The EU should encourage regional coordination among partner coastal States, especially in regions with transboundary stocks or shared ecosystems, such as

¹⁸ See, as an example, [EU IUU Coalition, A new generation of EU Sustainable Fisheries Partnership Agreements \(SFPAs\): Improving transparency to empower communities and prevent unsustainable and illegal, unreported and unregulated \(IUU\) fishing, May 2025](#).

¹⁹ [MAC Advice on “Roadmap on the Evaluation of the Sustainable Fisheries Partnership Agreements \(SFPAs\)” \(9 March 2021\)](#)

West Africa or the Western Indian Ocean. SFPAs should contribute to regional fisheries governance frameworks, harmonise standards across fleets, and promote joint monitoring, control, and surveillance initiatives. This would prevent harmful competition between neighbouring countries and help combat IUU fishing more effectively.

Transparency should be a pillar of all SFPAs. There should be public access to all agreements and protocols, disclosure of access fees, catch data, and financial flows, and identification of the beneficial owners of vessels operating under SFPAs. These measures help build trust, enable oversight by citizens and local authorities, and deter corruption or illicit practices. Sectoral support must be better aligned with national and community needs. Funds should be used transparently and monitored jointly with local stakeholders.

e) Articulation with EU ocean diplomacy

In the strategy's context, fishery and aquaculture products should be recognised as a strategic commodity within EU diplomacy, linked to climate, food security, and development goals. The operators of the fisheries and aquaculture supply chain should be recognised as strategic actors in food security, ocean monitoring, and maritime presence.

A coherent external fisheries policy is key to ensuring geopolitical leverage and food sovereignty, with due respect for food security in other countries, including through ocean diplomacy that fosters cooperation and market access, balancing high standards and supply security. The approach needs to bring together the various relevant services of the Commission, including DG MARE, DG TRADE, DG SANTE, DG INTPA, and EEAS.

Additionally, the EU should use the available instruments, such as trade measures, for concrete measures to protect its fishing rights against unilateral actions from third countries (e.g. Norway²⁰).

4. Recommendations

The MAC believes that, in the context of the upcoming communication on an “EU Strategy for Fisheries External Action”, the European Commission should:

- a) Set a strategy that contributes to increased coherence, proactivity, and effectiveness, while aligning with the objectives of the CFP;
- b) Strengthen collaboration, in line with international targets and objectives, with non-EU countries to promote improved international ocean governance and sustainable value chains, including through the measures foreseen in the CFP Regulation;
- c) Aim to reduce the dependency on fishery and aquaculture products from third countries, while also addressing any possible imbalance in the level playing field between EU and non-EU operators, and rebuilding stocks in EU waters as well as ensuring sustainable production outside EU waters – including catches in non-EU waters;
- d) Aim at ensuring the EU market is supplied with high quality, sustainable, legal, traceable, and affordable products that enable the processing industry and traders to provide consumers with balanced and nutritious diets – as global competition for fishery and aquaculture products intensifies, the EU must aim at optimising market sourcing that meet the EU standards;
- e) Aim to, in the context of access to the fishing waters of third countries and in the EU market sourcing, with due respect for food security in other countries, promote business and employment opportunities for the participating parties;

²⁰ [MAC Advice on “EU – Norway’s Trade of Fishery and Aquaculture Products” \(24 July 2024\)](#)

- f) When engaging with third countries, for example through trade agreements, RFMOs, and bilateral partnerships, continue efforts for overall improvements in the sustainability, quality, legality, traceability, and long-term reliability of the supply of fishery and aquaculture products;
- g) Ensure coherence across trade, environmental, and fisheries and aquaculture policies as well as with broader regulatory frameworks, such as the Corporate Sustainability Due Diligence Directive;
- h) Recognise the challenges faced by some operators, particularly SMEs, in both the EU and in third countries, in meeting increasing compliance requirements, and assess the possible impacts of these rules on EU food systems, trade dynamics, availability of nutrition and low-impact protein sources, and respect for broader sustainability goals;
- i) Promote science-based fisheries management at the international level;
- j) Account for the threats to sustainability and market supply caused by uncoordinated management of shared stocks by the relevant coastal States;
- k) Ensure that the EU leads global efforts, including through market power, to promote binding standards on social responsibility, such as on forced labour and decent working conditions, and to promote the adoption of the relevant international agreements, while offering guidance and support to partner countries;
- l) Maintain and expand on the current “zero-tolerance” approach to IUU fishing, including through the promotion of the CATCH IT system, cooperation with third countries, consistent application of import control rules across Member States, strengthened controls and rigorous due diligence;
- m) Strive for coherence across the various policies affecting international fisheries and aquaculture relations, such as trade, development, neighbourhood policy and foreign affairs, by promoting high standards, fair competition, transparency, and a level playing

field, while also recognising the importance of stability, competitiveness, and accessibility to sustainable proteins;

- n) Foster respect for labour standards by both EU and non-EU supply through a clear implementation of the Forced labour Regulation, stakeholder engagement and capacity development, substantial weight for supply chain risks under the forthcoming Corporate Sustainability Due Diligence criteria, promotion of internationally recognised standards, and recognition of voluntary certification schemes on social performance;
- o) Strengthen economic sustainability through due consideration of both EU and external supply, ensuring respect under trade arrangements for the three pillars of sustainability, implementation of market transparency through traceability provisions and digitalisation, and recognition of the importance of consumer information;
- p) Implement the available leverages on economic sustainability at the autonomous, bilateral, and multilateral levels, including through enforceable sustainability clauses in trade agreements, promotion of responsible fisheries management and improved working conditions and human rights protections, promotion of reciprocity in standards, open and fair-trade conditions, and preservation of EU production capacity;
- q) Continue promoting UNCLOS as the foundation for global ocean governance, including through full compliance at EU and international levels, including in RFMOs, support for and transposition of global initiatives, and capacity development with partner countries;
- r) Engage and coordinate with international partners and RFMOs to promote the adoption of similar standards on the fight against IUU fishing, including implementation of catch certification systems, leverage trade policies to incentivise compliance, rigorously implement the “carding system” without geopolitical biases, address opaque vessel ownership, and push for engagement with the Global Record on Fishing Vessels;
- s) Under the new generation of SFPAs, ensure a level playing field for EU operators, support the long-term viability of the EU fleet, and contribute to responsible food systems and



food security in the EU and partner countries, while also promoting cooperation and stakeholder engagement on stock management, transparency and controls, and social and environmental standards;

- t) Within EU ocean diplomacy, recognise fishery and aquaculture products as a strategic commodity, and recognise the operators of the supply chain as strategic actors in food security, ocean monitoring, and maritime presence.

Annex

Previous advice with particular relevance

- [“Twentieth Session of the FAOs Sub Committee on Fish Trade” \(20 August 2025\)](#)
- [“Urgent need for effective implementation of EU import control rules across Member States” \(27 June 2025\)](#)
- [“Integration of sustainability criteria under the regime of Autonomous Tariff Quotas for certain fishery products” \(28 April 2025\)](#)
- [“Consumer information on fishery and aquaculture products, particularly in the context of the HORECA Sector” \(23 October 2024\)](#)
- [“Health and Environmental Value of Seafood” \(8 December 2021\)](#)
- [“Fostering the European Union’s leadership in reducing the detrimental impact of flags of convenience in the fishing sector” \(8 October 2021\)](#)
- [“Roadmap on the Evaluation of the Sustainable Fisheries Partnership Agreements \(SFPAs\)” \(9 March 2021\)](#)
- [“Better Alignment of Import Control Schemes in Major Market States” \(28 September 2020\)](#)
- [“Level Playing Field” \(30 September 2019\)](#)