

Fisheries Control Regulation (FCR)

- New Regulation since 2024
- Covers all FAPs, including aquaculture, inland fisheries & imports
- Traceability from catch/harvest at all stages up to delivery to end consumers
- Controls possible at any point (in the EU)

Regulation (EC) No 1224/2009 (new) ... establishing a Union control system to ensure compliance with the rules of the common fisheries policy ...

Control locations according to FCR

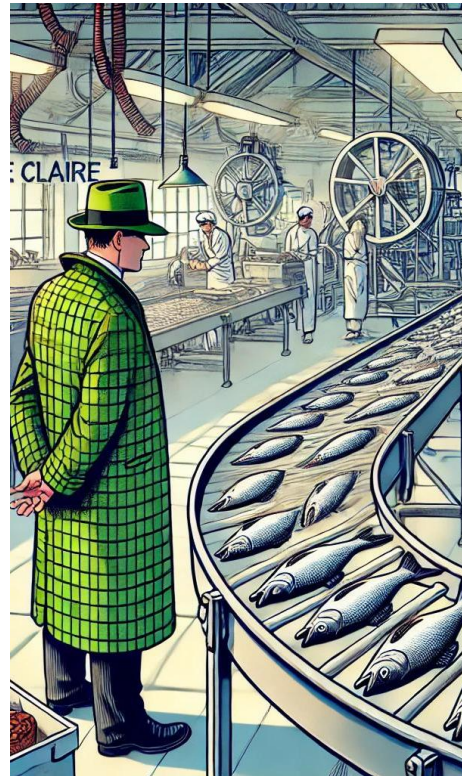
**Catch/harvest,
landing, first
sale**



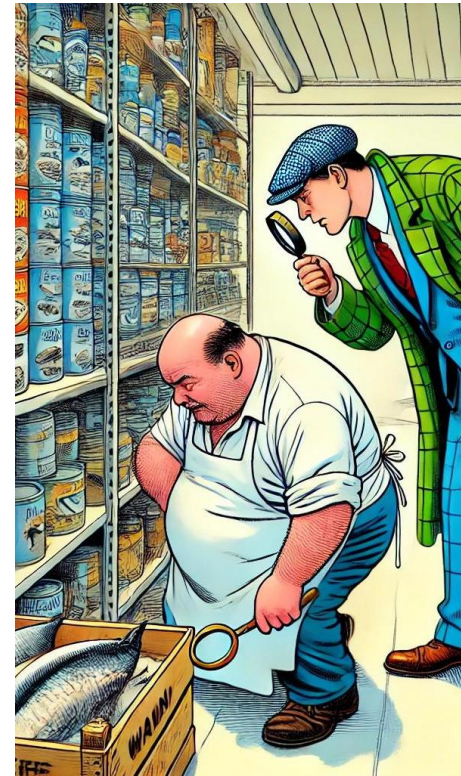
**Import,
logistics,
border crossing**



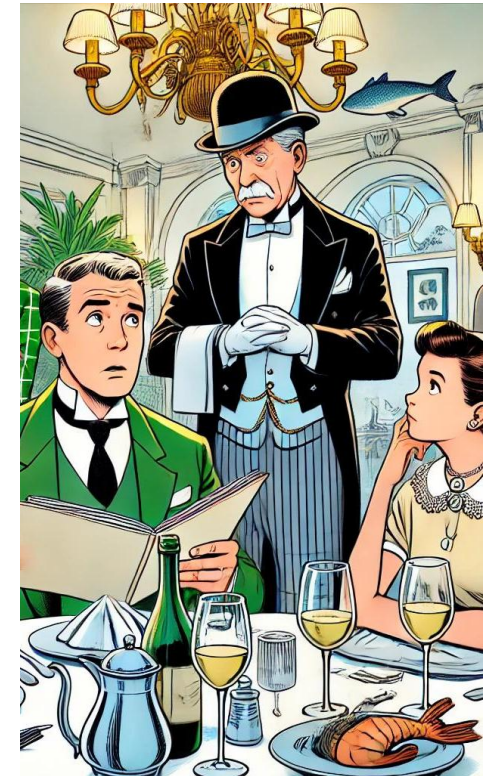
**Processing,
packaging**



**In retail
stores**



**In gastronomy
and food
service**



Lot information according to FCR

Regulation (EC) No 1224/2009 (new); Art. 58 (5)

- a) Lot Identification Number
- b) EU products:
 - a) Identification number of the fishing trip or fishing day
 - b) Aquaculture: producer name and registration number
- c) Imported products:
 - a) IMO No. or similar of the fishing vessel, Catch-ID
 - b) Aquaculture: producer name and registration number
- d) Species name (FAO code and scientific name)
- e) Fishing area or country of production
- f) Fishing gear category
- g) Date of catch/harvest
- h) Quantity in kg or pieces
- i) Undersized catches (quantity, pieces)
- j) Information according to marketing standard

Traceability of lots

- **Lot** information must be passed on in the supply chain
- When splitting, mixing and merging lots further down the chain, the original information must be preserved
- Applies from 01/2026 for **unprocessed products (CN 03)** and from 01/2029 for **processed products (CN 1604, 1605)**

Which products are affected?

Lot traceability (Art. 58, 5, 10, 11), based on Combined Nomenclature*

from 10 January 2026

“Unprocessed products” (CN 03)

- 0301 live fish
- 0302 Fish, fresh, chilled
- 0303 Fish, frozen
- 0304 Fish fillet, fresh, chilled, frozen
- 0305 Fish, dried, salted or in brine; smoked fish, whether or not cooked [...] smoking process:
- Crustaceans (ditto)
- Molluscs (ditto)
- Aquatic invertebrates (ditto)
- Flours, meals and pellets of fish, crustaceans, molluscs and other aquatic invertebrates, fit for human consumption

from 10 January 2029

Prepared or preserved products (CN 1604, 1605)

- 1604 Fish, prepared and preserved
 - fishfingers
 - cans
 - surimi
 - caviar
 - Prepared food with min. 20% fish
 - 1605 Crustaceans, molluscs and other aquatic invertebrates, prepared or preserved
 - Prepared food with min. 20% crustacean, etc
- 1212 21 seaweeds and other algae, fit for human consumption**

Does not apply to fish, crustaceans, molluscs and algae for ornamental purposes.

*COUNCIL REGULATION (EEC) No 2658/87 of 23 July 1987 on the tariff and statistical nomenclature and on the Common Customs Tariff

Who is affected?

Fisheries / Aquaculture

Affected

- Fisheries operators
 - EU and worldwide
 - Marine and freshwater
- Aquaculture
 - EU and worldwide
 - All species, all systems
- Live fish transporters
- Auctions, producer organizations, ...

Wholesale / Processors

Affected

- Wholesale
- Importers
- Logistics
 - Freight companies
 - Freight Service Providers
 - Cold stores
- Processors
 - EU and worldwide
 - From "small" to "large"
 - All types of processing and processing

Retail / Food service/ Gastronomy

Affected

- Retail
 - Fish trade
 - Food Retail
 - Discounters
 - Food Service
- Gastronomy
 - Restaurants
 - Canteens
 - Caterer
 - ...

Public authorities at all levels of the value chain

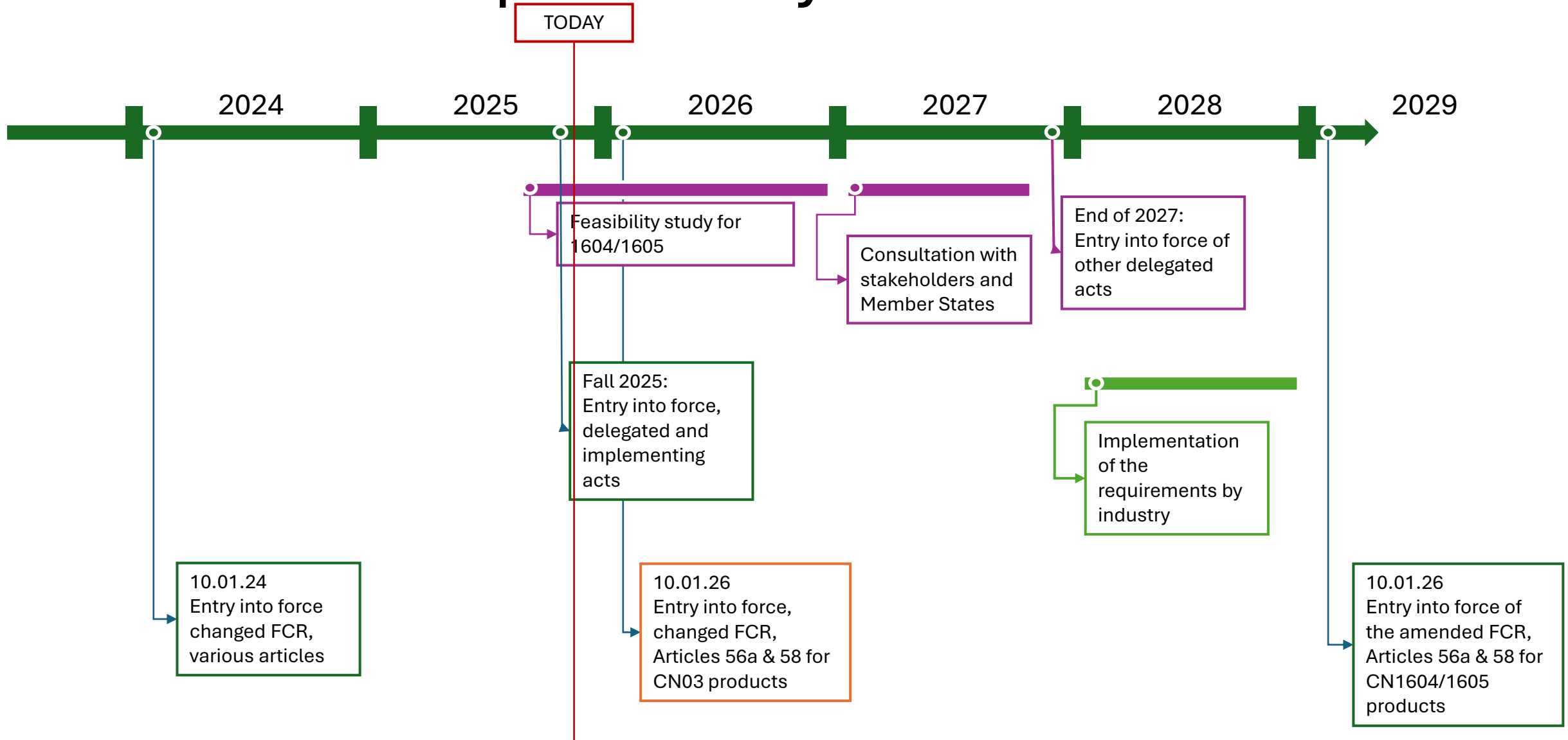
Digital traceability

Article 58, 6 and recitals:

- Lot information must be made available in a digital way
 - Within the supply chain
 - Upon request to the competent authority
- Minimum technical requirements and methods for labelling are/were to be specified in delegated acts.

Regulation (EG) Nr. 1224/2009 (new) Use of digital systems is mandatory for all market participants

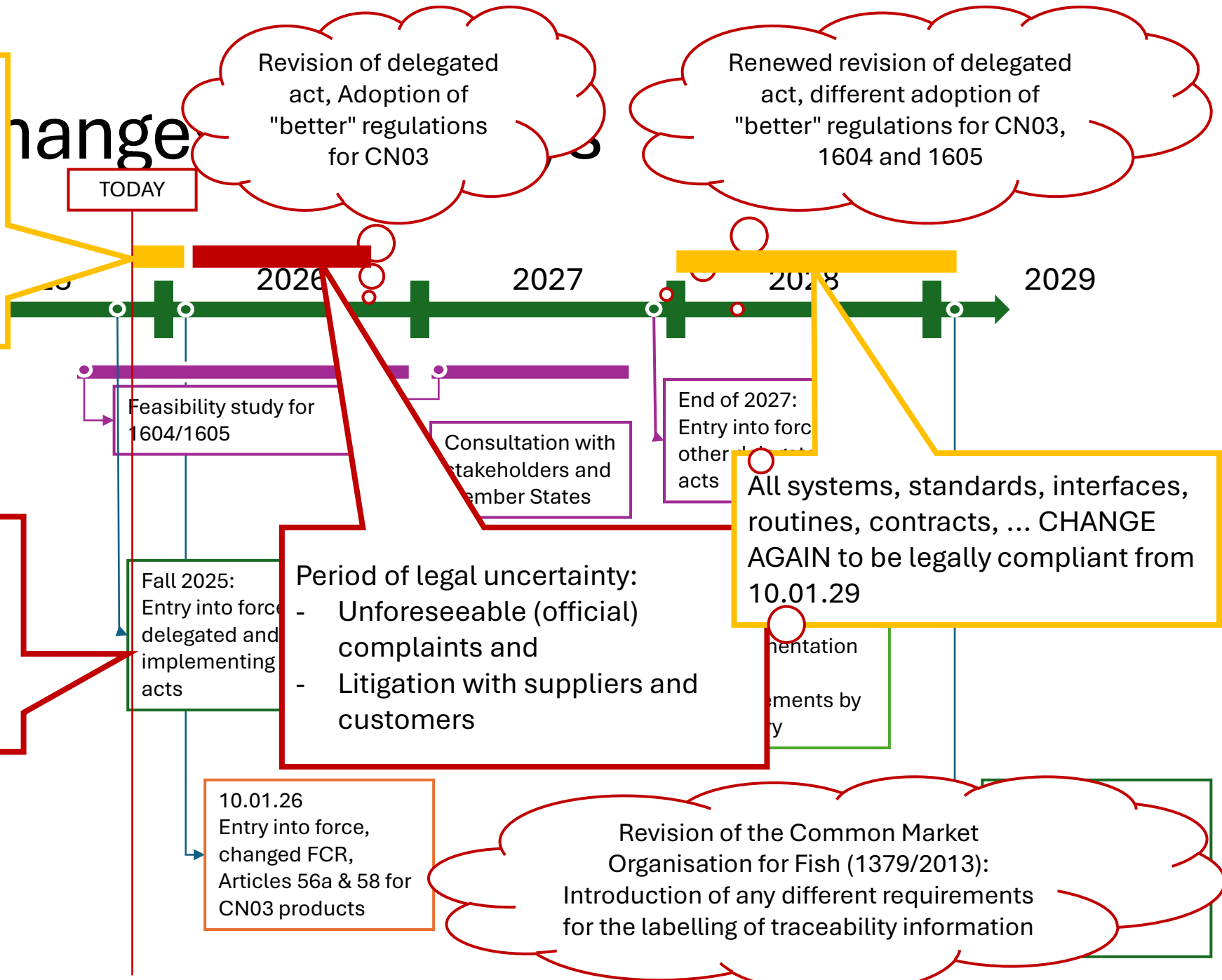
Timeline – as planned by EC



Change

From today, 44 days until entry into force!
Time for:

- Introducing new IT-system for lot traceability
- Changing ERP
- Implementing interfaces with all suppliers and customers



Implementation Area	Key Unresolved Prerequisite	Primary Consequence of Premature Implementation
Digital Interoperability	Data exchange standards reflecting the realities of business size and supply chain needs.	Fragmented national systems; data silos; unfair trade practices.
Small-Scale Fleet (<12m)	A viable, cost-effective, and widely adopted digital reporting solution for SSF.	Incomplete data at the start of the supply chain, rendering downstream traceability impossible.
Micro and small aquaculture operators	A viable, cost-effective, and widely adopted digital reporting solution.	Incomplete data at the start of the supply chain, rendering downstream traceability impossible.
Lot Management	Definition of procedures forming, merging and splitting of lots after first sale, quality-control and completion of inconsistent/incomplete lot information.	Incoherent data trails; legal disputes between operators; loss of marketability of food products.

An aerial photograph showing a large number of fishing vessels, primarily red and white, scattered across a vast blue ocean. The ships vary in size, with many appearing to be smaller-scale vessels. The perspective is from a high angle, looking down at the fleet. The water is a deep blue, and the sky is a lighter blue, suggesting a clear day.

SIZE OF EU BUSINESSES

- 98% of EU enterprises are SMEs, with 76% of the active fishing fleet being small-scale, more than 80% of the enterprises in the aquaculture sector being microenterprises, 86% of processing companies being small-sized and over half being micro-enterprises.
- These businesses lack the internal resources to sustain the financial and bureaucratic burden of investing in proprietary systems that may quickly become non-compliant or incompatible



Formally Postpone the 2026 Deadline (IMMEDIATE ACTION)

Formally postpone the application date for the digital traceability provisions (Article 58) for fresh and frozen products to prevent market turmoil, undue sanctions, and wasted investment across the supply chain.



Maintain Legal Certainty (INTERIM MEASURE)

Formally state that the existing rules (Article 67, Number 1-10 of Commission Implementing Regulation 404/2011) shall remain active until a new, functional Delegated Act enters into force, ensuring legal clarity for operators in the interim period.



Await and Analyse Evidence

Allow the Commission's own comprehensive study on feasible traceability systems (commissioned in May 2025, findings expected end of 2026) to be completed and thoroughly analysed by all stakeholders before new rules are drafted. This ensures the policy is evidence-based.



Co-develop the New Delegated Act

Convene a dedicated working group, ensuring the full and active participation of industry experts, to use the study's findings to co-develop a robust, practical, and legally sound Delegated Act that specifically resolves the three critical prerequisites: Interoperability, Lot Management Protocols, and the Small-Scale Fleet solution.



Establish a New, Realistic Timeline

Based on the completion and entry into force of the new Delegated Act, establish a new and realistic implementation timeline that gives businesses adequate time to adapt and invest in the correct, compliant technologies defined by the new rules.