



Advice

Competitiveness of the EU Market of Fishery and Aquaculture Products – Simplification and reduction of administrative burden

Brussels, 26 March 2026

1. Background

Under the Competitiveness Compass for the EU¹, the European Commission identified simplification as a priority, particularly a systematic effort to make procedures for accessing EU funds and making EU administrative decisions simpler, faster, and lighter. The Compass sets a target of cutting the administrative burden by at least 25% for all businesses and by, at least, 35% for SMEs. These efforts are also detailed in the Commission’s communication on implementation and simplification “a simpler and faster Europe”².

The tools to deliver simpler rules and more cost-effective implementation include new forms of stakeholder consultation (e.g., high-level implementation dialogues, “reality checks” – direct outreach to stakeholders on the ground), targets to reduce burden, gradual stress-testing (screening of the EU acquis), and a closer partnership between EU institutions and Member States. Therefore, DG MARE will be proceeding with stress testing, systematic evaluations of legislation, implementation dialogues, and reality checks.

The stress testing will include legal analysis to map the acquis and identify inconsistencies, contradictions, and instances of insufficient clarity and of potential consolidation or

¹ https://commission.europa.eu/topics/eu-competitiveness/competitiveness-compass_en

² [Communication from the Commission on “A simpler and faster Europe: Communication on implementation and simplification” \(11 February 2025\)](#)

simplification, and economic analysis to identify the main impacts of legal provisions, consider the health of the affected sectors, and quantify the potential impact of simplification. The primary focus of DG MARE will be the evaluation of the Common Fisheries Policy Regulation.

2. Introduction

The Common Fisheries Policy has been generally effective in meeting its environmental objectives, particularly in terms of increasing the number of fish stocks managed at sustainable levels. Nevertheless, further efforts are needed to reach the socio-economic objectives, as the number of fisheries and aquaculture operators has decreased and profitability stagnated.

According to the latest Commission Communication³, the EU fishing fleet shrank by roughly 3% in vessel numbers, 5% in gross tonnage, and 3% in engine power during 2024. As of 1 January 2025, the fleet comprised 69,570 vessels. In comparison, the fleet numbered 83,734 vessels in 2013⁴, a decline of about 17 % over twelve years. Moreover, compared with the 96,000 vessels in 2000⁵, this marks a 28 % reduction. This ongoing alarming downward trend is a significant concern for the maritime socio-economic sustainability. Even more when the average age of the EU fleet is over 31 years.

While, worldwide, the aquaculture sector has reached record production levels⁶, the EU aquaculture sector has stagnated since 2020 due to administrative requirements, limited access to space and water, trade-related aspects, and governance issues. More alarming, some

³ [European Commission, Communication “Sustainable fishing in the EU: state of play and orientations for 2026” \(6 June 2025\)](#)

⁴ [STECF, The 2015 annual economic report on the EU fishing fleet](#)

⁵ [FAO, The State of World Fisheries and Aquaculture 2002](#)

⁶ [FAO, The State of World Fisheries and Aquaculture 2024](#)

segments of the EU aquaculture sector, such as shellfish production, significantly declined their production volume⁷.

The MAC welcomes the effort to strengthen the competitiveness of EU supply chain stakeholders in the market. The efforts to enhance the sector's competitiveness and simplify procedures must be carried out in such a way as to help the producing, processing and retailing operators comply with the sustainability requirements set out in the regulatory framework of the EU market of fishery and aquaculture products. Under no circumstances should "simplification" be achieved at the expense of environmental and social safeguards, which are the cornerstone of the long-term profitability of the producing, processing, and retailing sectors. However, environmental competent authorities at national and regional levels should work closely with the authorities responsible for fisheries and aquaculture to ensure that environmental rules are implemented in a way that does not hinder the sustainable development of food production in EU waters.

3. Stress testing

DG MARE will be undertaking legal analysis to map the acquis and identify inconsistencies, contradictions, instances of insufficient clarity, potential consolidations or simplifications, and economic analysis, to identify the main impacts of legal provisions, consider the health of the affected sectors, and quantify the potential impact of simplification.

3.1. Administrative burden

a) Landing Obligation

The Landing Obligation introduced new burdens on fisheries operators in terms of onboard work, recording of unwanted catches, and corresponding economic costs, while also contributing to an underutilisation of attributed quotas. Existing legal exemptions limit the potential impacts,

⁷ [STECF, The 2024 Aquaculture Economic Report](#)

particularly of the so-called “choke species”, that could affect mixed fisheries. In some countries, exemptions were developed to allow for the provision of fishing quotas and “mini quotas”.

There are also various challenges related to the implementation of the landing obligation⁸, including Insufficient port infrastructure to handle additional landings of unwanted catches, difficulties with handling, storage, processing of unwanted catches at port, lack of national funding to adapt port infrastructure, and inexistence of economic outlet for unwanted catches brought to land. In theory, there are different uses and market outlets available for catches below the Minimum Conservation Reference Size⁹, such as fish meal, fish oil, pet food, food additives, pharmaceuticals, and cosmetics. At the same time, the policy’s aim for these catches to be reduced / disappear in the medium to long-term acts as a deterrent to the development of a market and to finding motivated investors. Therefore, in practice, the handling and processing costs are significantly higher than the potential revenues for the value chain.

Generally, in the view of the MAC, the Common Fisheries Policy should promote selectivity, maximisation of catch utilisation and minimisation of waste, in line with circular economy principles.

3.2. Redundancies, implementation challenges, conflicts, incoherences

a) Producer Organisations

As part of the Common Market Organisation, recognised Producer Organisations play a key role in the implementation of the Common Fisheries Policy by managing fishing and aquaculture activities, market access, resources distribution, and implementation of consumer information

⁸ [MAC Advice on “Study supporting the evaluation of the Landing Obligation” \(18 September 2024\)](#)

⁹ [European Commission: Directorate-General for Maritime Affairs and Fisheries and EUMOFA, Market outlets for unwanted catches – Executive summary, Publications Office, 2020](#)

activities¹⁰. In accordance with Article 28 of the Common Market Organisation Regulation, each Producer Organisation shall submit a Production and Marketing Plan, for, at least, its main marketed species to its competent national authorities for approval.

As previously indicated¹¹, there are identified challenges in the establishment and functioning of Transnational Producer Organisations, as there is a complex recognition process, conflicts between Member States, and a challenging decision-making process. The establishment and recognition of Interbranch Organisations faces several challenges across Member States, particularly in terms of legal clarity and access to financing, as the EU legal framework remains underdeveloped. The establishment of Transnational Association of Producer Organisations also lacks a clear legal framework, as the existing EU framework does not provide specific provisions on their setting-up and functioning. In the view of the MAC, the Commission should put forward a clear and simple legal framework for the mentioned types of organisations.

As previously indicated, delays in the adoption of the funding programmes can significantly affect the ability of Producer Organisations, particularly those with limited financial capacity (e.g., new Producer Organisation, reduced number of members), to execute their planned activities. In the view of the MAC, under the next Multiannual Financial Framework, the financing for Producer Organisations should be strengthened, for example through the ring-fencing of support. To avoid potential negative impacts due to delays in the adoption of funding mechanisms, the Commission should guarantee the continuity of funding, including through access to funding from the previous financial period, and the use of alternative funds to cover gaps.

¹⁰ [European Commission, Report on Implementation of Regulation \(EU\) No 1379/2013 on the common organisation of the markets in fishery and aquaculture products \(2023\)](#)

¹¹ [MAC Advice on “Producer Organisations under the Common Market Organisation in Fishery and Aquaculture Products”](#)

As previously indicated, there are significant differences in the financial support provided to Producer Organisations and the eligibility criteria followed across the various Member States. In the view of the MAC, the Commission should aim to improve the level-playing-field in the financial support to Producer Organisations across the EU, including through the provision of similar funding intensities, the setting of a minimum financial allocation per recognised Producer Organisation, the development of clear guidelines on eligible actions, close monitoring by the Commission services of the national implementations, and the establishment of a database with comparative funding data.

In the view of the MAC, the Commission should take the opportunity to identify and address other implementation challenges and potential administrative burdens faced by the Producer Organisations, including in relation to access to financing, complexity of the legal framework, and competitiveness, building on previous work on the functioning of professional organisations¹².

b) EU sectoral funding

As demonstrated by the corresponding mid-term evaluation, the implementation of the European Maritime, Fisheries and Aquaculture Fund has faced delays due to the COVID-19 pandemic, the Russian war of aggression against Ukraine, the late approval of national legal frameworks, and capacity issues. Bureaucratic reporting procedures slowed down implementation. Early operations focused on strengthening institutional structure rather than providing direct economic support to economic operators. In practice, some companies faced delays exceeding a year.

¹² [European Commission: Directorate-General for Maritime Affairs and Fisheries, Common Market Organisation \(CMO\) provisions on professional organisations and consumer information – Final report, Publications Office of the European Union, 2025](#)

Therefore, in the view of the MAC, the Commission and Member States must proceed with a faster execution of the funds, so that companies receive financial aid in a timely manner. The Commission should take an active role in overseeing and expediting fund allocation at both national and regional levels. For the next financial period, early preparations should take place before the formal adoption of the programme. Monitoring and reporting systems should include the necessary guidance. Stakeholder engagement should take place throughout the whole process to address needs and innovation.

c) Registration of commercial designations for fishery and aquaculture products

Article 37 of the Common Market Organisation Regulation¹³ requires each Member State to maintain an updated national list of commercial designations for the species marketed in its territory, together with their scientific name. The list shall include the scientific name of each species and the commercial designation.

In practice, the registration procedure for new commercial designations can take up to one year, delaying market access and creating a competitive distortion, particularly for common products, such as certain shrimp or tropical fish species. In the view of the MAC, to ensure trade fluidity, the EU should allow products to be imported and marketed provisionally from the date a request for the addition of a new commercial name is submitted, provided that the rest of the labelling information is compliant, including the species name, and that such a name does not cause confusion with the established common names of other species. Under Article 37 of the Common Market Organisation Regulation, a new provision should be added to set a specific deadline for a decision by the Member State on the registration of new commercial designations.

¹³ [Regulation \(EU\) No 1379/2013 of the European Parliament and of the Council of 11 December 2013 on the common organisation of the markets in fishery and aquaculture products](#)

Point a) of paragraph 1 of Article 37 of the Common Market Organisation Regulation allows for the scientific name to be set in accordance with the FishBase Information System or the ASFIS database of the Food and Agriculture Organisation (FAO). In case of other pieces of legislation, such as Council Regulation (EU) 2024/2025 on fishing opportunities, references are made to FAO areas and divisions. Therefore, in the view of the MAC, Article 37 should be revised to prioritise the setting of scientific names in accordance with the FAO database, ensuring consistency across legislation. When the ASFIS database of the FAO is not up to date, then the FishBase Information System should be used. In the case of species not covered by the FishBase Information System, SeaLifeBase should also be taken into account.

d) Consumer information requirements¹⁴

Fishery and aquaculture products are subject to the consumer information requirements foreseen in the Food Information to Consumers Regulation¹⁵. Depending on the product type and segment, the products can be subject to the mandatory requirements of the Common Market Organisation Regulation¹⁶. Among other pieces of legislation, the products can also be subject to the Implementing Regulation on the country of origin / place of provenance¹⁷. In the future, other

¹⁴ [MAC-AAC Recommendation on “Consumer information on fishery and aquaculture products, particularly in the context of the HORECA Sector” \(23 October 2024\)](#)

¹⁵ [Regulation \(EU\) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers](#)

¹⁶ [Regulation \(EU\) No 1379/2013 of the European Parliament and of the Council of 11 December 2013 on the common organisation of the markets in fishery and aquaculture products](#)

¹⁷ [Commission Implementing Regulation \(EU\) 2018/775 of 28 May 2018 laying down rules for the application of Article 26\(3\) of Regulation \(EU\) No 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers, as regards the rules for indicating the country of origin or place of provenance of the primary ingredient of a food](#)

EU initiatives, such as the proposed Green Claims Directive¹⁸, and the voluntary tool on the sustainability of fishery products, could also impact labelling practices¹⁹.

In practice, the dispersion of rules across various legal instruments can be challenging for operators, particularly small ones, local and national authorities to interpret and implement. In 2014, the European Commission published a pocket guide on the EU fish and aquaculture consumer labels²⁰. In the view of the MAC, the pocket guide should be updated to reflect legislative developments since 2014, such as Implementing Regulation (EU) 2018/775. Furthermore, the pocket guide should be continuously updated when new pieces of legislation impacting labelling are adopted.

Under the Farm to Fork Strategy, the Commission announced the adoption of a horizontal framework law aiming to make the EU food system sustainable and to integrate sustainability into all food-related policies²¹. Until now, the Commission has not proceeded with the mentioned initiative and, while not formally acknowledged, it appears to have been abandoned²². In the view of the MAC²³, the Commission should reassess the relevancy of developing a framework law with definitions and principles on sustainability of food products, to ensure alignment between the various food products on the EU market (e.g., fishery and aquaculture products, agricultural products) under a new framework law or under an existing legal text.

e) Accessibility labelling requirements for consumer products - use of Braille

¹⁸ [MAC Advice on “Substantiation and Communication of Explicit Environmental Claims \(Green Claims Directive\)” \(30 November 2023\)](#)

¹⁹ [MAC Advice on “Development of Fishery Sustainability Indicators by STECF” \(30 January 2025\)](#)

²⁰ [European Commission, A pocket guide to the EU’s new fish and aquaculture consumer labels \(2014\)](#)

²¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13174-Sustainable-EU-food-system-new-initiative_en

²² <https://www.ombudsman.europa.eu/en/opening-summary/en/210064>

²³ In the past, the MAC provided advice on the potential development of a Sustainable Food System Framework. Most recently: [MAC Advice on “Sustainable Food System - Setting Up an EU Framework” \(13 December 2022\)](#)

The European Accessibility Act²⁴ sets out requirements to ensure that packaging, installation instructions and other product information on consumer products be accessible. As part of their transposition, some Member States, such as Spain²⁵, started developing labelling in Braille for consumer goods of special relevance to person with disabilities, including foodstuffs. Therefore, in practice, there is a lack of uniform labelling legislation in the Single Market due to national divergences, plus a lack of implementation at national level.

In the view of the MAC, to ensure coherence across the Union market, the European Commission should provide guidance on how Member States should implement the European Accessibility Act, particularly the use of Braille, in relation to foodstuffs.

f) Presentation of the catch certificate

Article 16 of the IUU Regulation²⁶ requires that the catch certificate be submitted at least three days before the arrival of the products in the Union. In practice, in some Member States, late submissions by operators systematically lead to requests for re-export of the consignment, without consideration of specific circumstances.

In practice, imports of fresh fishery products into the EU, particularly from the UK, can be negatively impacted by the requirement to submit the catch certificate at least three days in advance of the arrival of the products into the Union. In the case of imports from the UK, EU importers must wait three days after the fish is landed before importation to satisfy the

²⁴ [Directive \(EU\) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services](#)

²⁵ <https://technical-regulation-information-system.ec.europa.eu/en/notification/27007>

²⁶ [Council Regulation \(EC\) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing](#)

notification requirement. Since fish is a perishable product, the described practice is detrimental to the freshness and value, impacting the product quality for the end consumer.

In the view of the MAC, to ensure a more proportionate and harmonised application of the mentioned provision, without introducing amendments to the IUU Regulation, the European Commission should circulate an information note on how Member States should approach the issue of delays in the submission of catch certificates. Ideally, the information note should clarify that Member States are allowed to apply a case-by-case approach, in particular where: the delay in submission results from a clearly justified logistical or administrative issue, and there is no doubt regarding the traceability and conformity of the consignment. The described approach would preserve trade fluidity without weakening the control guarantees provided by the Regulation.

In the view of the MAC, whereas, at present, the competent authority (in the case of imported products from the UK, usually, the French Border Control Post) may voluntarily choose to reduce the notification period to facilitate trade, it would be preferable, if an opportunity for a technical revision of the requirement arises, to amend the requirement to a shorter notification period. The shorter notification period would facilitate trade and facilitate the availability of fresh fishery products in the EU market.

g) Packaging and Packaging Waste Regulation

The Packaging and Packaging Waste Regulation introduces various targets on companies concerning reuse, recycling, and reduction of packaging²⁷. To achieve these targets, the

²⁷ [MAC Advice on “Packaging and Packaging Waste Regulation: Impacts of the package reuse targets for the EU, fisheries, aquaculture and fish processing industries” \(18 March 2025\)](#)

Regulation imposes an open system for reuse across economic actors, supported by traceability and reserve logistics for hygiene cleaning.

While the Regulation pursues legitimate circular-economy objectives, its reuse obligations also apply to packaging formats, such as boxes for fresh fishery products, that function as direct food-contact hygiene and temperature-control tools in highly perishable supply chains. Fresh fish is among the most perishable products placed on the EU market. During transport, fresh fish remains in continuous direct contact with the inner surface of the box under melting ice conditions. The container, therefore, forms part of the hygiene control and temperature management system, rather than serving as a neutral logistics unit.

Even minor deviations in temperature or hygiene conditions may accelerate spoilage, reduce shelf life, increase microbial growth and lead to food loss. *Listeria monocytogenes* is of particular concern in fish value chains due to its ability to survive and grow at refrigeration temperatures, form biofilms on plastic surfaces, persist in surface scratches and circulate as “house strains” within food-production environments.

In a reuse system, food-contact containers circulate across batches, operators and Member States. This establishes potential transmission loops whereby microorganisms from one site may be reintroduced into subsequent batches via the packaging itself. Reusable containers, particularly when subject to wear, may retain moisture, residues and odour, creating favourable conditions for microbial persistence. Fresh-fish residues rapidly generate trimethylamine (TMA) and other volatile amines when washing is delayed, illustrating how odour, spoilage and microbial proliferation can develop quickly in the absence of immediate and controlled sanitation. In long-distance, open-loop logistics — where empty containers may travel before washing — reuse may therefore increase odour formation, contamination risk and shelf-life reduction, directly contributing to food loss.

The EU food-safety *acquis* imposes strict cumulative obligations. Regulation (EC) No 852/2004 requires containers used for food transport to be kept clean and effectively cleaned between loads. Regulation (EC) No 853/2004 requires that containers for fishery products prevent contamination and allow meltwater drainage. Regulation (EC) No 2073/2005 establishes microbiological criteria, including the absence of *Listeria monocytogenes* in ready-to-eat products placed on the market. Regulation (EC) No 1935/2004 requires that food-contact materials not compromise safety. Regulation (EC) No 178/2002 enshrines the precautionary principle and operator responsibility, and Regulation (EU) 2017/625 requires official controls to verify compliance across the chain.

Furthermore, for the operators of the fisheries and aquaculture supply chain, who are already subject to specific traceability requirements under the Fisheries Control Regulation and under food safety rules, the mentioned obligation would represent a double traceability – of the container and of the contents. The monitoring of the requirements for container and the contents would not necessarily be concordant, representing an additional implementation challenge for the operators.

As previously recommended in 2025, in the view of the majority of the membership of the MAC, the European Commission should assess the practical feasibility of the reuse targets for all kinds of stakeholders, and eventually assist SMEs in the implementation of the new legal framework – this could, following appropriate justification and solid substantiation, potentially lead to a delegated act, including requests of exemptions for fish boxes (particularly accounting that thermal control transportation packaging needs to be kept below 5 degrees Celsius), as foreseen in point 18 of Article 29 of the Packaging and Packaging Waste Regulation. Among the membership, Oceana and WWF dissented from the described recommendation.

In the view of the MAC, if an exemption for fish boxes under point 18 of Article 29 is not pursued, the relevant Commission services (i.e., DG MARE, DG ENV, DG SANTE) should also undertake an analysis of the expected costs and practical challenges for operators of the fishery and aquaculture supply chain of implementing this new type of traceability requirements on containers.

h) Hygiene rules for food of animal origin – temperature of melting ice

Regulation (EC) No 853/2004²⁸ lays down specific hygiene rules for food of animal origin. For the storage and transport of fresh fishery products, the Regulation foresees that it must be maintained at a “temperature approaching that of melting ice”.

In practice, Member States follow different definitions of the mentioned concept. As an example, the German authorities consider 2°C to be acceptable for raw materials used in the manufacture of fish oil, while the authorities of certain Member States consider that it should be closer to 0°C. Therefore, due to the varying interpretations of national authorities, operators are forced to re-label the packaging when trading fresh fishery products across the Single Market.

In the view of the MAC, the relevant Commission services (e.g., DG SANTE, DG MARE) should collect information on the interpretations followed by the various Member States. Following exchanges with the relevant stakeholders, the Commission should publish an information note clarifying the concept of “temperature approaching that of melting ice”, to facilitate the intra-EU trade of fresh fishery products. If relevant for food safety purposes, the Commission should consider consulting the European Food Safety Agency.

i) Hygiene rules for food of animal origin – production of fish oil

²⁸ [Regulation \(EC\) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin](#)

The hygiene rules for the production of fish oil intended for human consumption as laid down in Regulation (EC) No 853/2004 are not well adapted to the realities of the industry and do not reflect the latest best practices implemented in European production facilities. A concrete example concerns the use of Total Volatile Basic Nitrogen (TVB-N) as a measure to be determined when the organoleptic examination raises doubts about the freshness of the raw materials. The limit laid down in Regulation (EU) 2019/627 was developed for gutted fish and fish fillets stored in ice and not for whole fish used for the production of food grade fish oil. EFSA has also indicated that sensory assessment provides the most reliable indication of raw material freshness in this context²⁹.

In the view of the MAC, revisions to the fish oil production regulations should be reviewed on the principle that any criteria and thresholds (e.g. TVB-N) should be derived from scientific guidance and modern analytical evidence.

j) Health certificates for imported products of animal origin – issuing of replacements

Article 6 of Regulation 2020/2235³⁰ foresees that “competent authorities shall only issue replacement certificates for consignments of animals and goods intended for human consumption in the case of administrative errors in the initial certificate or where the initial certificate has been damaged or lost”.

In practice, the mentioned provision is applied in a very restrictive way in cases of administrative error, leading to a significant number of consignments being destroyed or re-exported, even

²⁹ [EFSA Panel on Biological Hazards \(BIOHAZ\); Scientific Opinion on Fish Oil for Human Consumption. Food Hygiene, including Rancidity. EFSA Journal 2010;8\(10\):1874 – Parameters for raw materials \(page 35\)](#)

³⁰ [Commission Implementing Regulation \(EU\) 2020/2235 of 16 December 2020 laying down rules for the application of Regulations \(EU\) 2016/429 and \(EU\) 2017/625 as regards model animal health certificates, model official certificates and model animal health/official certificates, for the entry into the Union and movements within the Union of consignments of certain categories of animals and goods, official certification regarding such certificates](#)

when the error has been formally acknowledged and corrected by the competent authority of the exporting third country. These cases often involve minor errors (e.g., scientific name of the species, batch number) without an impact on food safety or actual traceability.

Therefore, in the view of the MAC, Article 6 should be clarified via an information note from the European Commission.

k) Control of Vibrio bacteria in fishery products

The EU legal framework includes provisions for general food requirements, hygiene of foodstuffs, hygiene rules for food of animal origin, official controls on products of animal origin, and microbiological criteria for foodstuffs. According to EFSA, the occurrence and levels of Vibrio is expected to increase in seafood³¹.

Since Regulation 2073/2005³² does not list Vibrio, Member States are allowed to apply additional national rules. In practice, the lack of uniform legislation leads to different alerts and responses depending on the country, translating into contradictions between the various resolutions. For operators, this results in significant costs, supply disruptions, and loss of costumers. When the presence of Vibrio bacteria is confirmed, the corrective action is generally to cook the fishery product, even if the products were intended for cooking from the outset.

In the view of the MAC, to improve simplification and consistency, the EU could introduce harmonised, risk-based Vibrio control criteria (or EU-level guidance) focusing on high-risk seafood categories. This would reduce divergent national responses and help operators apply proportionate corrective actions without unnecessary disruption of supply chains.

³¹ [EFSA, Public health aspects of Vibrio spp. related to the consumption of seafood in the EU \(2024\)](#)

³² [Commission Regulation \(EC\) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs](#)

l) Physical in-office collection of certificates related to food safety controls

According to Article 5(5) of Regulation 2017/625³³, “official controls shall be performed as much as possible in such a manner that the administrative burden and operational disruption for operators are kept to the minimum necessary, but without this negatively affecting the effectiveness of those controls”. The EU framework allows for consignments of animals and goods to be accompanied by an official certified in electronic form. In practice, in some Member States, such as Spain, operators are required to collect the health certificates from the health authority, representing schedule restrictions and delays.

Therefore, in the view of the MAC, to improve simplification and reduce costs for operators, the Commission should put forward EU-level guidance on the mentioned Article as well as promote, across the EU, the use of digital platforms to access digital certificates.

m) Value Added Tax

The VAT tax rate applied to fishery and aquaculture products varies across the Single Market. In the view of the MAC, the Commission should encourage the Member States to develop a low and harmonised VAT tax rate across the EU for healthy and sustainably sourced fishery and aquaculture products, as a way to guarantee affordable nutritious products, to encourage the consumption of healthy and sustainable products, to reduce public expenditure connected to poor dietary choices, and to ensure a level-playing-field among market operators.

n) Marketing standards for fishery and aquaculture products - freshness criteria

³³ [Regulation \(EU\) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products](#)

As outlined in Article 33 of the Common Market Organisation Regulation, the EU legislative framework includes rules on the marketing standards of fishery and aquaculture products³⁴, including freshness categories and size / weight classifications.

As outlined in previous advice³⁵, in the view of the MAC, the freshness criteria are no longer relevant and should be replaced by an indication whether the product is “fit for human consumption” or “not fit for human consumption”, as per the General Food Law³⁶. An external evaluation study commissioned by the European Commission³⁷ highlights multiple times that the freshness criteria become irrelevant after the first sale, that there are compliance issues in the Mediterranean Sea basin, issues of subjectivity and inconsistent implementation across the actions and Member States.

4. Implementation Dialogues³⁸

On 1 July 2025, Commissioner Kadis held an Implementation Dialogue on the Maritime Spatial Planning Directive. On 24 November 2025, the Commissioner held an Implementation Dialogue on Small-Scale and Coastal Fisheries, for which the MAC was invited to participate. Each Commissioner is expected to hold Implementation Dialogues twice per year.

³⁴ [Council Regulation \(EC\) No 2406/96 of 26 November 1996 laying down common marketing standards for certain fishery products, Council Regulation \(EEC\) No 2136/89 of 21 June 1989 laying down common marketing standards for preserved sardines and trade descriptions for preserved sardines and sardine-type products, Council Regulation \(EEC\) No 1536/92 of 9 June 1992 laying down common marketing standards for preserved tuna and bonito](#)

³⁵ [MAC Advice on “Public Consultation - Review of the Marketing Standards Framework for Fishery and Aquaculture products” \(4 February 2021\)](#)

³⁶ [Regulation \(EC\) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety](#)

³⁷ [European Commission: Directorate-General for Maritime Affairs and Fisheries and Coffey International, Study, evaluation of the marketing standards framework for fishery and aquaculture products – Final report, Publications Office, 2019](#)

³⁸ https://commission.europa.eu/law/law-making-process/better-regulation/simplification-and-implementation/implementation-dialogues-0_en

4.1. Organisation of future Implementation Dialogues

In the view of the MAC, the Implementation Dialogues should include a broad and representative number of participants, including, when relevant, the Advisory Councils. The sessions should include sufficient time for interventions by the invited participants, but also for the Commissioner to react in a comprehensive manner to these. The Commission should provide details on the planned follow-up and the added value of the interventions made by the stakeholders.

4.2. Suggestions of topics for future Implementation Dialogues

a) Future of European Aquaculture

The MAC welcomes the announcement of an Implementation Dialogue on the future of the European aquaculture sector to take place on 30 June 2026.

In the view of the MAC, the Implementation Dialogue should cover the contribution of aquaculture to the supply of the EU market of fishery and aquaculture products as well as other market-related issues. In terms of consumption, the EU's internal market is one of the largest markets of fishery and aquaculture products in the world³⁹. As the self-sufficiency rate stands at 30%, the EU is vulnerable to market fluctuations, price volatility, international competition, and geopolitical risks. According to the FAO⁴⁰, on the worldwide scale, meeting the demand for greater availability of aquatic animal foods requires higher production. Therefore, the EU must address the challenges faced by the EU aquaculture sector to strengthen food security in the EU.

Besides the abovementioned market-related issues, the Implementation Dialogue would also necessarily have to, for a comprehensive overview, cover the implementation challenges of

³⁹ [EUMOFA, The EU Fish Market \(2024\)](#)

⁴⁰ [FAO, The State of World Fisheries and Aquaculture 2024](#)

primary production. In due respect of the area of competence of the Aquaculture Advisory Council, primary production aspects are not addressed in the present document.

b) Competitiveness of the post-harvest supply chain

An Implementation Dialogue on the competitiveness of the post-harvest supply chain, particularly focusing on the processing sector, would be welcomed. Fisheries and aquaculture represent sustainable and valuable resources as well as a key pillar for the economy of rural and coastal communities. The development of these sectors is closely dependent on the viability of the post-harvest supply chain, including auctions, processors, traders, distributors, fishmongers, and other retailers. The exchange could cover the implementation of the DG MARE acquis, particularly the new digitalisation requirements for the traceability of fishery and aquaculture products⁴¹, the marking of mixed lots, and sectoral support for the land-based sectors⁴². The exchange could also cover horizontal issues, such as the implementation of the Packaging and Packaging Waste Regulation⁴³, environmental⁴⁴ and sustainability labelling⁴⁵, including voluntary ecolabels, and consumer information⁴⁶. Other factors impacting the competitiveness of the post-harvest supply chain, such as energy, labour, and veterinary rules, could also be considered.

c) International trade of fishery and aquaculture products and the EU sector

⁴¹ [MAC Advice on “Upcoming Delegated Act on Additional Rules for Traceability of Fresh and Frozen Fishery and Aquaculture Products and Marking of Lots” \(12 March 2025\)](#), [MAC Advice on “Terms of Reference of the Study on Feasible Traceability Systems and Procedures for Prepared and Preserved Fishery and Aquaculture Products” \(24 May 2024\)](#)

⁴² [Multi-AC Letter on “Multi-AC letter on the future of the Multiannual Financial Framework” \(15 April 2025\)](#)

⁴³ [MAC Advice on “Packaging and Packaging Waste Regulation: Impacts of the package reuse targets for the EU, fisheries, aquaculture and fish processing industries” \(18 March 2025\)](#)

⁴⁴ [MAC Advice on “Substantiation and Communication of Explicit Environmental Claims \(Green Claims Directive\)” \(30 November 2023\)](#)

⁴⁵ [MAC Advice on “Development of Fishery Sustainability Indicators by STECF” \(30 January 2025\)](#)

⁴⁶ [MAC-AAC Recommendation on “Consumer information on fishery and aquaculture products, particularly in the context of the HORECA Sector” \(23 October 2024\)](#)

An Implementation Dialogue on the trade of fishery and aquaculture products and the EU sector would be welcomed. In terms of consumption, the EU's internal market is one of the largest markets of fishery and aquaculture products in the world. As the self-sufficiency rate stands at 30%, imports via various trade instruments, such as free trade agreements, economic partnership agreements, the Generalised Scheme of Preferences, and autonomous tariff quotas, play a role in the supply of the EU market. According to the FAO, on the worldwide scale, meeting the demand for greater availability of aquatic animal foods necessitates higher production. Depending on the region, the required increase in supply may be sourced from increased domestic production and supplemented by imports⁴⁷. Furthermore, exports of EU fishery and aquaculture products to other markets also play a role in the competitiveness of EU operators.

d) Interoperability between fisheries, food safety and customs control systems

An implementation dialogue on the interoperability between fisheries, food safety and customs control systems would be welcomed. Exporters and importers must use multiple platforms, such as CATCH, TRACES, national systems, and private Enterprise Resource Planning, which means that there can be some duplication in the controls related to fisheries, food safety, and customs. Digitalisation, interoperability, including with the systems of third countries under CATCH, and harmonisation should be promoted. Therefore, the integration of CATCH into TRACES is welcomed. Nevertheless, the practical implementation across veterinary, customs, and fisheries administrations and the authorities of third countries is operationally complex. Small inconsistencies between platforms can result in duplicated submissions, delays and uncertainty. The use of the multiple platforms can be particularly challenging for SMEs.

5. Reality checks

⁴⁷ [FAO, The State of World Fisheries and Aquaculture 2024](#)

In the upcoming 12-18 months, the European Commission will carry a series (10-12 or more) of reality checks in a workshop format. DG MARE will identify around 15 participants per workshop. The workshops will be organised according to EU languages or group of languages rather than according to topics.

In the view of the MAC, the workshops should include all stakeholders of the fisheries and aquaculture supply chain, including primary producers (fishers and aquaculture farmers), processors, traders, wholesalers and retailers, consumers, civil society organisations and environmental organisations, as well as competent authorities to promote a transparent and participatory discussion. The participation of representatives of the Advisory Councils would also be welcomed. The invited representatives should also reflect the geographical diversity across the EU. Experts should be provided with the opportunity to present the realities of fishery and aquaculture supply chains in detail, including existing procedures and bottlenecks, while covering examples for various types of products and supply (e.g., EU supply, imports, fresh, frozen). Pilot case studies – “end-to-end data journey” could be useful to determine administrative burden.

Furthermore, in the view of the MAC, the organisers should share the agenda and discussion points with the invited stakeholders in advance to allow for sufficient preparation. The organisers should also clearly explain how the inputs will be taken on board by the Commission. Reports of the workshops should be made publicly available by the Commission afterwards.

6. Recommendations

The MAC considers that, in the context of the ongoing efforts for simplification and reduction of administrative burden, the European Commission should:

- a) When undertaking “stress testing” of the DG MARE legal acquis, with due cooperation with other relevant Commissions services (e.g., DG SANTE, DG ENV), take into account the topics below:
- i. Landing Obligation
 - ii. Legal framework and financing of Producer Organisations
 - iii. EU sectoral funding
 - iv. Registration of commercial designations
 - v. Consumer information requirements
 - vi. Accessibility requirements for consumer products (use of Braille)
 - vii. Presentation of the catch certificate
 - viii. Packaging and Packaging Waste Regulation
 - ix. Hygiene rules for food of animal origin
 - x. Issuing of replacement health certificates for imported products of animal origin
 - xi. Controls of Vibrio bacteria in fishery products
 - xii. Physical in-office collection of certificates related to food safety controls
 - xiii. Value Added Tax
 - xiv. Marketing standards for fishery and aquaculture products (freshness criteria);
- b) Proceed with the organisation of an Implementation Dialogue on the “Future of European Aquaculture”, and schedule Implementation Dialogues on “Post-harvest Supply Chain”, “International Trade of Fishery and Aquaculture Products”, and “interoperability between fisheries, food safety and customs control systems”;
- c) In the context of the Implementation Dialogues, ensure sufficient time for interventions by the invited participants and for a comprehensive response by the Commissioner, while also providing details on the planned follow-up and the added value of the interventions made by the stakeholders;



- d) Under the “reality checks workshops”, promote a transparent and participatory discussion through the inclusion of all stakeholders of the fisheries and aquaculture supply chain, to identify existing practices, bottlenecks and simplification routes;
- e) Following the “reality checks workshops”, make the corresponding reports publicly available, and explain how the inputs provided by the participating stakeholders will be taken on board by the Commission services.