

Ms Charlina Vitcheva  
Director-General, DG MARE  
Rue Joseph II 99, 1049 Brussels

Ms Sabine Weyand  
Director-General, DG TRADE  
Rue de la Loi 170, 1049 Brussels

Brussels, 27 April 2026

**Subject: EU-Indonesia Comprehensive Economic Partnership Agreement**

*Dear Director-General Vitcheva and Director-General Weyand,*

As foreseen in Article 43 of the Common Fisheries Policy Regulation, the Market Advisory Council (MAC) advises the European Commission and the Member States on matters related to the EU market of fishery and aquaculture products.

The draft EU-Indonesia Comprehensive Economic Partnership Agreement (CEPA)<sup>1</sup> foresees duty-free access to tuna filets from Indonesia, including an immediate liberalisation of fresh fillets and a progressive elimination of duties for frozen fillets. The described liberalisation does not seem consistent with the information previously shared and discussed with the MAC<sup>2</sup>.

In the EU market, tuna is a high-value product segment, representing a key value-added segment for the EU fleet, including small-scale coastal fishers. A full liberalisation of access for tuna fillets creates significant competitive pressure on EU operators, which risks undermining investments, market positioning, and the level playing field. Indonesia's scale of production and export capacity, combined with structural differences in regulatory, social and monitoring frameworks, further exacerbates the imbalance and potential market distortion.

Moreover, the absence of enforceable guarantees in these areas further reinforces the described concerns. It is important to keep in mind that, in the Indian Ocean, Indonesia has objected to key catch limits, continuously fails to correctly report on its derogation to board regional observers for at-sea transshipments and is unable to estimate the size of its fleet, while also underestimating the number of fishing devices used in fisheries (particularly anchored fishing aggregating devices). Additionally, Indonesia has not ratified key conventions of the

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<sup>1</sup> [https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements\\_en](https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/indonesia/eu-indonesia-agreements_en)

<sup>2</sup> At the 18 September 2025 meeting of our Working Group 2, as recorded in the [minutes](#), a Commission representative informed that "as for market access, a cautious approach was taken for sensitive products, including for tuna products. Modest tariff-rate quotas were set for tuna products".

International Labour Organisation, and several reports question their ability to prevent both labour abuses and illegal, unreported, and unregulated (IUU) fishing<sup>3</sup>.

Therefore, we would like to request clarification from the European Commission on the rationale and calibration of the tariff concessions for tuna fillets, especially accounting the previous indication that tuna would be treated as a “sensitive product” and that only modest tariff-rate quotas would be pursued. We would also like to request information on whether a socio-economic impact assessment has been conducted on this specific product segment.

We would like to request, prior to the conclusion of free trade agreements with an impact on the market of fishery and aquaculture products, a meaningful and strengthened engagement with the MAC, including through continued transparent sharing of information. In accordance with the role foreseen under the Common Fisheries Policy Regulation, the MAC hopes to contribute to informed and balanced EU policymaking.

We kindly request a prompt response and remain available to discuss in further detail.

Yours sincerely,



Yobana Bermúdez  
Chair of the Market Advisory Council

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<sup>3</sup> [International Organization for Migration, et al. \*Human Trafficking, Forced Labour and Fisheries Crime in the Indonesian Fishing Industry\*. International Organization for Migration, 2016](#), and [Greenpeace Southeast Asia. \*Forced to the Bottom: Squeezing Indonesian Fishers and Oceans for Dirty Tuna Profits\*. 2026](#).