Market Advisory Council

Advice

Competitiveness of the EU Market of Fishery and Aquaculture Products – Upcoming studies on the Fisheries Control Regulation

Brussels, 26 May 2026

1. Background

Under the Competitiveness Compass for the EU[1], 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.

DG MARE identified the Fisheries Control Regulation as a relevant source of regulatory costs within the fisheries policy, as a relevant part of the reporting obligations directly concerning

[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)

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business operators stem from this regulation. DG MARE is preparing a study that aims to identify and analyse the costs and benefits of the implementation of the Control Regulation with special regard to the recent legislative revision, particularly the digitalisation measures. DG MARE is also preparing a specific cost analysis study of the fisheries sector from the perspective of operators.

In accordance with information shared by DG MARE representatives, the studies will be developed over the course of 18 months, with conclusion planned for Summer 2027. The aim of the present advice is to provide guidance on the priorities, including most relevant questions and topics, to be addressed under the upcoming studies on the Fisheries Control Regulation.

In the view of the MAC, the preliminary results of the study on "traceability systems and minimum traceability information for lots of specific fisheries and aquaculture products"[3], launched by the European Commission in May 2025, could provide for relevant and valuable insights into the administrative challenges faced by operators.

2. Costs and benefits of the implementation of the Fisheries Control Regulation, particularly the new rules on digitalisation

a) Expected benefits

Simplification efforts should not happen at the expense of the EU's marine ecological and social resilience. Existing rules should continue to pursue the objectives they were made for, namely protect fish stocks and marine ecosystems, prevent illegal, unreported and unregulated fishing activities, ensure transparency and science-based decisions to secure the long-term sustainability of the fish stocks. Simplification should not be used to downsize the sustainability ambition set in the Fisheries Control Regulation and in the Common Fisheries Policy. Therefore, in order for

[3] European Commission's letter of introduction for the study on ""traceability systems and minimum traceability information for lots of specific fisheries and aquaculture products" (5 May 2025)

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the current regulatory framework to be effective, some of the current difficulties encountered by the sector to implement the requirements should be addressed.

The new rules on digitalisation of reporting and control under the revised Fisheries Control Regulation are expected to support the fight against illegal, unreported, and unregulated fishing, enhance traceability in supply chains, and help achieve the Common Fisheries Policy's objective of sustainability managing the EU's shared fishery resources. The new traceability requirements could also facilitate the cooperation between health and fisheries authorities, reducing the risk of sanctions for operators. In the view of the MAC, the study should look into these opportunities.

Long-term benefits may include better integration of social and environmental considerations into decision-making and regulatory frameworks, including by ensuring that responsibilities and costs linked to verified impacts are allocated in a transparent, proportionate, and risk-based manner, without undermining the continuity of compliant fisheries and aquaculture trade and food supply.

Traceability data elements are expected to be collected and shared digitally through electronic systems, which means that operators would be better equipped to identify risks of unsustainable or unethical sourcing as well as risks relating to health and safety. If fully and adequately implemented across the entire supply chain, the new traceability requirements could improve internal management processes, provide downstream operators with immediate and detailed documentation on the fishery and aquaculture products, and generate operational synergies across the sector, the administrators, and consumers. As technology continues to evolve, traceability systems should become increasingly easier to implement and manage, in addition to being more cost-effective.

b) Expected costs

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According to an information note shared by the European Commission on 10 December 2025[4], the obligation to record and make available information "in a digital way" is "formulated in a technologically neutral way, allowing compliance through a range of means enabling digital data transmission, without requiring the development or use of specific digital systems or means across the entire supply chain". The note adds that "In practice, operators already may arguably meet this requirement using basic electronic tools, including manual data input. Digital transmission could be understood as referring to the transfer of information using electronic means that allow data to be created, stored, sent, and received in a digital format. This includes, for example, sending data via email, electronic files (such as PDF, XML, or CSV), online platforms, or any other electronic system capable of transmitting information in a non-paper, digital way".

The Commission's information note clarifies that "in the short term, compliance with Article 58 of the revised Control Regulation, as from 10 January 2026, requires no more than the transmission of the relevant lot information to the immediate supplier or buyer in a digital format, rather than in paper form, with a view to facilitating the flow, retention, and verifiability of data. This minimum standard, which is readily implementable by all operators, including small ones, does not preclude stakeholders from adopting more advanced solutions, as is already the case for several operators, including the use of specific interoperable standards and systems (e.g., GS1/GDST/barcodes)".

In the view of the MAC, this is similar to the "One Step Back, One Step Forward" approach to information exchange in food supply chains required by the General Food Law. In this respect, regarding the information exchange in the supply chain and the technical and operational procedures to implement this information exchange, on the level after first sales, fishery and

[4] Information-note on traceability of fishery and aquaculture products under Regulation (EC) No 1224/2009, as amended by Regulation (EU) 2023/2842

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aquaculture products seems to be not genuinely different from other food items in the EU market.

In the view of the MAC, in the short-term, for operators that continue to follow the "minimum standard" described in the Commission's information note, the costs should be limited, as staff adapts from paper-based transmission to transmission via email messages, electronic files, or electronic platforms. Nevertheless, it must be noted that there might be costs associated with the introduction of data from fishing vessels below 12 meters, as the logbooks can still be paper-based until 2028, as well as some legal uncertainty concerning the requirements for aquaculture products.

Digitally processable formats can improve efficiency and reduce human error compared to non-processable formats. At the same time, it is important to consider that the fisheries and aquaculture value chain is mainly composed by SMEs and even microenterprises[5] that have relied predominantly on paper-based systems. Until recently, the implementation of traceability in a digital way was rare and generally limited to larger enterprises or those operating in specific commercial circuits.

As indicated in the Commission's information note, stakeholders are not precluded from adopting more advanced digital solutions for the transmission of information, including through the use of specific interoperable standards and systems. In this context, digital standards and systems can be categorised as either "non-proprietary" or "proprietary". Whereas proprietary systems and standards are well established and maintained in some parts of the supply chain, these might not be accessible or affordable for others, due to high costs and technical complexity.

[5] As an example, in the case of the shellfish sector, in France, which is the leading Member State in production of shellfish by value, 98.3% of shellfish aquaculture enterprises are micro-enterprises (fewer than 10 employees), and 79.3% have fewer than five employees.

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For context of the above mentioned, “non-proprietary” standards and systems are characterised as a decentralised way, hosted and operated by multiple providers, granting accessibility at a minimal cost, allowing to receive and forward information across the supply chain, irrespective of the recipients’ or senders’ location and status. On the other hand, “proprietary” standards and systems are characterised as commercial platforms and service providers that require registration, licensing fees and subscription status for access to data, for introduction of data and for transmission along the supply chain. Such systems are most often found in the market to be centralised, operating from a central server architecture under an individual provider’s jurisdiction. In such systems, users enter a legal contract with the single provider to access the information. Transmission of information of information along the supply chain typically incurs a handling fee per transactions.

It is important to recall that, in the case of digital systems, “interoperability”[6] refers to the ability of a system to receive, interpret, use, and transmit digitally structured lot-related information from and to external systems, without loss of meaning or integrity, in a manner that enables continuous traceability and regulatory control throughout the supply chain. “Standards for interoperability” refers to internationally recognised or commonly agreed specifications, including traceability and data-exchange standards (e.g., GDST, GS1 EPCIS), that enable digital systems to exchange and process lot-related information in a uniform and unambiguous manner, while preserving traceability throughout the supply chain.

Examples of non-proprietary and proprietary standards and systems include the following:

	Non-proprietary	**Proprietary**
Standards	Spreadsheet file (CSV, XLSX)	GS-1 EPCIS

[6] For a legal definition of interoperability, see Article 2(40) of Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data. See also Articles 33 to 36 of the mentioned regulation.

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	XML-structured data	GDST
Systems	E-Mail Open API Cloud storage	Closed API Commercial tracking software provider

Presently, there are several computer solutions for traceability management, but there can be challenges related to the lack of interoperability between the various systems as well as related to the registering of product catalogues from different suppliers. In line with the current legislation, EU fisheries and aquaculture operators can define digital systems according to their technical and operational capacities. Therefore, in the view of the MAC, it would also be relevant for the upcoming studies to analyse the expected benefits and costs, at the operator's level, of developing and implementing more advanced solutions, including interoperable ones. It is worth reminding that, at present, the number of operators across the fisheries and aquaculture value chain with an implemented digital traceability system compliant with the existing international data standards on interoperability is limited[7], but recent presentations at the MAC suggest that there is an increased interest[8].

The exact costs for operators to implement advanced solutions, such as non-proprietary and proprietary digital systems that are interoperable, are challenging to estimate, depending significantly on the mode of supply (e.g., fish auctions, imports), the typology of the clientele and the situation of the companies, the size of the structures, the species treated and the degree of mixing of lots. The implementation phase of traceability software can be costly, as exemplified

[7] As an example, at present, in France, no shellfish aquaculture enterprise operates a digital system compliant with GS1 or GDST.

[8] 5 February 2026 meeting of Working Group 2

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by TRACABAAPP[9], which represented an investment of around €100.000 for the association of buyers who established it. As another example, the French sector, through the association France Filière Pêche, is conducting a national project[10] worth €800,000 to develop a technological solution capable of facilitating, accelerating and making reliable the exchange of information relating to regulatory traceability with a single, secure digital format and in a time frame close to that of the exchange of physical products.

In the view of the MAC, financial and other support should be provided to operators, especially SMEs, to facilitate the introduction of advanced digital systems. When choosing to implement advanced solutions with interoperability, operators can face significant licensing fees from commercial platform providers for the introduction of product-related data. Therefore, in the view of the MAC, it would be relevant for the upcoming studies to analyse existing business conducts of service providers, including potential unfair trading practices, as well as the costs incurred by operators who choose to use commercial platforms, while also analysing open and free models.

In the view of the MAC, the upcoming studies should also analyse the technical requirements for making existing data elements, documented in the context of control and import activities, accessible to the eligible operators and to control authorities, in order to avoid duplicated data entry. In the case of imports from third countries, there is data available via CATCH, under TRACES. In the case of EU capture fisheries, there is data available via digital first sales, under the national first sales reporting systems. These data are created and entered into digital systems in a structured format and could, in principle, be made available from there in a standardised and

[9] TRACABAPP is a French local initiative established by an association of Breton buyers to consolidate fish auction data provided in different formats for all first buyers. The implementation of the mentioned initiative represented a first investment of €100,000 for this association and requires continuous human and financial resources to adapt to potential updates in fish auction systems.

[10] https://www.francefilierepeche.fr/projets/outil-de-tracabilite-des-produits-de-la-mer/

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interoperable way, so that operators on the level of first sale can make use of these existing data elements to feed into their respective (advanced) digital system of choice.

Overall, successful implementation of the new digital traceability requirements depends on political will and budget availability from Member States, coordinated guidance and harmonised practices by competent authorities, clear multilingual technical documentation, and prioritised capacity-building for fishers and first sale operators – the least digitalised link in the value chain.

As mentioned above, the Commission's information note clarifying the meaning of transmission "in a digital way" was published on 10 December 2025, while Article 58 of the revised Fisheries Control Regulation entered into force on 10 January 2026. In the view of the MAC, it would have been preferrable to receive the information note earlier, as the lack of clarity could have led to unnecessary investments by the sector. The mentioned delay potentially also contributed to varying interpretation and inspection protocols by public authorities. In this context, it is important that the upcoming studies look both at the costs and benefits in a proportionate and pragmatic way.

3. Costs faced in daily business activities

Traceability, as foreseen in the Fisheries Control Regulation, refers to the collection of minimum traceability information and the ability to pass this information through the supply chain as well as track the movement of fishery and aquaculture products across the supply chain, as the information is transmitted from one operator to the next one. Suppliers must provide all the information related to the batch of fishery and aquaculture products from the first sale. The information must be available at all stages of production, processing and distribution, from capture to the retail phase. All products placed on the market must be properly identified in such a way to guarantee the traceability of each lot. In practice, the organisation of the transmission of information depends on various factors, such as type of product (e.g., fresh fishery product,

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frozen fishery product, aquaculture product) and the number of actors involved in the respective supply chain.

The transmission of the traceability information is important to comply with the mandatory information requirements to consumers foreseen in Article 35 of the Common Market Organisation Regulation. Currently, product traceability information is generally provided through a commercial document (e.g., invoice, packaging list, sales note, purchase order or label) linked to the product. Downstream operators, particularly the smaller ones, face challenges when requesting the digital transmission of information by their suppliers. Traceability information exchange is a common responsibility across all supply chain actors which ensures timely, accurate and reliable data transfer. As an example in the processing sector, German processors indicate that, based on their empirical experience, in the case of paper-based transmission of information, data collection can take ten to 20 minutes per lot, while quality assurance requires an additional five to ten minutes per lot, plus that, even in the case of digital transmission, there can still be significant manual effort. As an example in the retail sector, Spanish fishmongers spend one to two hours per day on the manual labelling of fishery and aquaculture products, with the implicit personnel costs[11].

In the case of fresh products, it is important to keep in mind that the product labelling work, usually in nighttime conditions, must be done very promptly to maintain the freshness of the products. However, there are instances where mistakes are made. If the distributor transmits insufficient or erroneous information, the retailer may only have the labels of damaged or illegible boxes, given the humidity and water conditions. There are also bottlenecks where operators need to input information into a digital format manually, for example, if the products are divided into batches for different buyers or if the product is sold in several pieces, there is

[11] FEDEPESCA, Sistema Electrónico de Transmisión de Datos de Trazabilidad: SETPESCA

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only one label that is not duplicated. It is important to note that the lack of a harmonised data format can result in duplication and errors, which could have a negative effect on downstream operators. Therefore, from that point of the chain on, the required traceability information is achieved with personal investments from the operator to avoid risking the spoilage of the food item.

In the context of the control of the implementation of the traceability requirements foreseen in the Fisheries Control Regulation, it is important to keep in mind that, after first sale, the enforcement of consumer information typically involves food safety authorities. As a result, controls of labelling requirements are often combined with other checks under the General Food Law. According to some feedback of a recent DG MARE study[12], this approach may challenge inspectors, as checking multiple regulatory areas may reduce their focus on consumer requirements.

Under the existing approach, control authorities can request, at any time, traceability information from the immediate supplier, as defined by Article 58 of the Fisheries Control Regulation. When the information is not presented in a satisfactory manner, the control authority has the discretion to request further or other information.

4. Potential implementation challenges

Previously, the MAC provided advice on the upcoming additional rules for traceability of fresh and frozen fishery and aquaculture products and marking of lots[13] as well as advice on the Terms of Reference for the study on feasible traceability systems and procedures for prepared and

[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

[13] 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)

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preserved fishery and aquaculture products[14]. Under these documents, several potential implementation challenges following the recent revision of the Fisheries Control Regulation were already addressed. Furthermore, as outlined below, there are some implementation challenges faced by operators that precede the recent revision.

a) Risk of duplication with other traceability requirements

Operators of the fisheries and aquaculture supply chain must comply with traceability obligations foreseen in the General Food Law[15] and in hygiene legislation[16]. As foreseen in Article 18 of the General Food Law, operators must take a "One Step Back, One Step Forward" approach to ensure the identification of the various parties across the supply chain.

In the case of fishery products, for hygiene traceability purposes, operators must transmit information on the species name and batch identification for recall reasons, the catch area, the date of minimum durability or freezing, and the net weight for consumer sales and lot tracking. Therefore, there are some similarities with the information that must be recorded under the fishing logbook requirements, in accordance with Article 14 of the Fisheries Control Regulation, such as the FAO alpha-3 code of each species and the relevant geographical area, the date and time of capture, and the estimated live weight, and then transmitted across the supply chain, in accordance with Article 58 of the same Regulation.

[14] 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)

[15] 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

[16] Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs, 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, 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

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In the case of aquaculture products, for hygiene traceability purposes, operators must transmit information on the production zone and site. As an example, for bivalve molluscs, information on the classified production zone systems (categories A, B and C based on microbiological contamination levels), mandatory registration documents for all live shellfish transfers, sanitary approval of purification and dispatch centres, and mandatory health marking are transmitted. Therefore, there are some similarities with the information that must be transmitted on the identification number of the lot, species name and FAO code, production zone, the name and registration number of the producer or aquaculture production unit, date of harvest, and quantity, under Article 58 of the revised Fisheries Control Regulation.

In the view of the MAC, the Commission should study the administrative overlaps related to the submission of identical or similar data into different systems, to streamline reporting processes. When possible, the Commission should explore how to facilitate, for example via guidance and/or under potential future delegated acts, the parallel transmission of information on fisheries and aquaculture-specific aspects under Article 58 the Fisheries Control Regulation, particularly under the landing declaration, so that they can be streamlined with other traceability requirements, specifically sanitary ones.

b) Exemptions from traceability requirements for small quantities of fishery products

Following the recent revision of the Fisheries Control Regulation[17], paragraph 8 of Article 58 on "Traceability" reads "Member States may exempt from the requirements set out in this Article small quantities of fishery products which are sold directly to consumers from catching vessels, from operators fishing without a vessel, or from freshwater fisheries operators, provided that

[17] Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control

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the products are used only for private consumption and that those quantities do not exceed 10 kg of fishery products per consumer per day. For salmon (*Salmo salar*) caught in the Baltic Sea, the threshold shall be two individuals per consumer per day" and that "Member States may exempt from the requirements set out in this Article small quantities of aquaculture products that are sold directly to consumers from an aquaculture production unit, provided that the products are used only for private consumption and that those quantities do not exceed 10 kg of aquaculture products per consumer per day".

Paragraph 2 of Article 59 reads "the buyer of the fishery products at first sale shall be registered with the competent authorities of the Member State where the first sale takes place. For the purposes of registration, each buyer shall be identified according to its VAT number, tax identification number or other unique identifier in national databases", while paragraph 3 reads "this Article shall not apply to consumers acquiring fishery products which are not thereafter placed on the market but used only for private consumption, provided that those quantities do not exceed 10 kg of fishery products per consumer per day. For salmon (*Salmo salar*) caught in the Baltic Sea, that threshold shall be two individuals per consumer per day".

As an example, in Spain, a country with a high level of apparent consumption of fishery and aquaculture products, the household consumption per person in 2024 was of 17.99kg per person, of which less than 8kgs are from fresh products, with an average expenditure of €200,06. The exemption for quantities that do not exceed 10kg would exempt more than half of the average purchase in a store. Therefore, in the Member States that apply the foreseen exemption, the exemption could be seen as discriminatory against the retail sector, while also decreasing transparency.

As the introduction of an exemption is optional to Member States, in the view of the MAC, it would be relevant for the Commission to collate the list of existing and planned exemptions, and

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to examine the effects on the competitiveness across the supply chain and level-playing-field across the Member States.

c) Transmission of the "Fishing Trip Identifier" / "Fishing Day"

Following the recent revision of the Fisheries Control Regulation, under Article 58, as a traceability requirement, for lots of fresh and frozen fishery or aquaculture products not imported into the Union, information on "the unique fishing trip identification number(s), or the unique fishing day identification number(s)"shall be made available.

i. Recent revision of the Implementing Regulation

Paragraph 6 of Article 146c of Commission Implementing Regulation (EU) No 404/2011[18], determined that "a unique human readable fishing trip identifier shall be used to link the fishing log-book data with landing declaration data, transhipment declaration data, sales note data, take-over declaration data and transport document data".

The above-mentioned implementing regulation was repealed by the Commission Implementing Regulation (EU) 2025/2196[19], which simplified the minimum requirements on data. Under the new regulation, data on the vessel name, external identification number of the vessel, and supplier information (name and address) is no longer required, instead there is the "unique fishing trip identification number".

[18] Commission Implementing Regulation (EU) No 404/2011 of 8 April 2011 laying down detailed rules for the implementation of Council Regulation (EC) No 1224/2009 establishing a Community control system for ensuring compliance with the rules of the Common Fisheries Policy

[19] Commission Implementing Regulation (EU) 2025/2196 of 17 October 2025 laying down detailed rules for the implementation of Council Regulation (EC) No 1224/2009 as regards access to waters and resources, control of fisheries, surveillance, inspection and enforcement, deduction of quotas and fishing efforts, data and information, and repealing Commission Implementing Regulation (EU) No 404/2011

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Article 68, titled “information to the consumer”, of the repealed regulation explicitly required the indication of the commercial designation, the scientific name of the species, the catch area, and the production method to be transmitted on the label or appropriate mark of the products offered for retail sale. The 2025/2196 implementation regulation does not include an equivalent requirement. Nevertheless, under Article 35 of the Common Market Organisation Regulation, in the case of products falling under Chapter 03 of the Combined Nomenclature, the mentioned information must be transmitted to the consumer.

In the view of the MAC, the Commission should study whether the transmission of the minimum consumer information requirements for the digital transmission of the unique fishing trip identification number constitutes a reduction of administrative burden. The systematic transmission and processing of additional fisheries control data (e.g., fishing trip identifiers, vessel identifiers, catch certificate references) by downstream operators may generate significant administrative and IT burdens.

ii. Production batches from multiple production areas / producers, mixed lots

In relation to the implementation of Article 35 of the Common Market Organisation Regulation and the new Article 58 of the Fisheries Control Regulation, it is important to note that several fishing vessels, across more than one fishing area, can contribute to a single production batch. For example, when a processing plant mixes catches from various fishing vessels into one lot of frozen fillets, the processor must manage multiple unique identification trip identification numbers for a single output lot.

Furthermore, there can be cases where a primary producer uses two different fishing gear interchangeably, which means that, within the same lot, there could be the same species caught using two types of gear. In these cases, for the downstream operators, it can be challenging to discern which fishing gear and vessel information should be transmitted. Therefore, the setting

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of a one-to-one digital link between the final product and the original catch operations can be technically challenging for the downstream operators.

At the same time, it is important to recall that, under the Fisheries Control Regulation, since 2010, via a paper-based documentation system, there have been specific mandatory requirements on traceability applicable to fishery and aquaculture products. As previously mentioned, the transmission of traceability information, in accordance with Article 58 of the revised Fisheries Control Regulation, is relevant to comply with the mandatory information requirements to consumers foreseen in Article 35 of the Common Market Organisation Regulation, including, since 2013, with the mandatory indication as consumer information of the "category of fishing gear". Therefore, in the view of the MAC, the aim should continue to be an implementation of fisheries control requirements in a way that does not hinder compliance with consumer obligations.

In the view of the MAC, the Commission should study whether specific challenges, including ones from before the recent revision of the Fisheries Control Regulation, have been faced by operators, particularly processors and retailers, in relation to the implementation of the unique fishing trip identification number in connection to the mixing of batches. The Commission should study where support could be provided to operators to comply with the requirements to exchange data across the supply chain.

iii. Applicability to aquaculture products

The concepts of "fishing trip identifier" / "unique fishing trip identification number" / "fishing day identification number" were designed from the perspective of capture fisheries. These concepts are structurally inapplicable to the aquaculture sector, as there is no fishing vessel, no trip, and no equivalent identifier.

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In practice, the aquaculture sector, particularly the shellfish sector, uses the production zone number, as defined in national prefectural classification order, and the sanitary approval number of the dispatch centre as the primary identifiers. Until now, the Commission has not provided guidance on how aquaculture operators should comply with the mentioned requirements, generating legal uncertainty.

In the view of the MAC, the Commission should develop sector-specific guidance on how aquaculture operators can comply with the requirements of Article 58, specifically with the inapplicability of the "fishing trip identifier".

d) Transmission of the information on the common marketing standards

Following the recent revision of the Fisheries Control Regulation, under Article 58, as a traceability requirement, in the case of lots of fresh and frozen fishery or aquaculture products, for products subject to common marketing standards, the information required in order to comply with those standards shall be made available. The requirement originates from Article 33 of the Common Market Organisation Regulation and from the specific framework on common marketing standards for fishery and aquaculture products[20].

As outlined in previous advice[21], 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 Law[22]. Since

[20] 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

[21] MAC Advice on "Public Consultation - Review of the Marketing Standards Framework for Fishery and Aquaculture products" (4 February 2021)

[22] 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

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freshness varies throughout the chain, the transmission of information of the first value determined at the first sale may become less relevant later in the supply chain. For the retail sector, in general, the information received is limited to what is required under the "Hygiene Package" and the data required to comply with the consumer information requirement of the Common Market Organisation. In the view of the MAC, the upcoming study could analyse the administrative burden and the corresponding added value related to the transmission of the information on the freshness criteria across the supply chain, as required by the revised Fisheries Control Regulation.

e) Sector-specific implementation of the concept of "lot"

From an operational perspective, the constitution of a "lot" varies between the fisheries and aquaculture sectors.

As mentioned above, in the fishing sector, there can be specific challenges related to several fishing vessels, across more than one fishing zone, contributing to a single production batch. There can also be challenges related to the presence, within the same lot, of the same species caught using two types of gear.

In the case of the aquaculture sector, a single commercial batch may combine animals grown across multiple production zones over multiple years, subsequently transferred to purification basins and/or affinage sites before expedition. The described multi-stage, multi-site production cycle does not align in a simple manner with the definition of "lot" implied by Article 58 of the revised Fisheries Control Regulation[23].

[23] At the national level, France issued a dedicated technical instruction (DGAL/2023-701) to clarify the definition of a shellfish lot and introduced a new national registration document model, generating an additional administrative requirement for operators.

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In the case of mixing of various lots of fishery and aquaculture products, at any stage after first sale and before the retail stage, any traceability information data element can potentially become a duplicated entry. This applies to the information on species, fishing trip identification numbers, IMO numbers, production areas, gear categories, and capture quantities, when these are merged/mixed from various previous lots. On the level of the individual operator, only the lot number is expected to be a unique and single identifier.

In the view of the MAC, in coherence with the legal framework on traceability and labelling and with the Commission's information note, the Commission should clarify whether multiple entries in each data element are allowed or not[24]. If allowed, it should be done in a way that ensures the transmission of the legally foreseen minimum information across the supply chain, in line with Article 58 of the Fisheries Control Regulation. In the case of controls, control authorities should be able to request additional (upstream) data from the respective operators, specifically asking for the information of the lots involved in the forming of the merged/mixed lot.

In the view of the MAC, the study should analyse the practical implementation of the concept of "lot" across the various sectors of the fisheries and aquaculture value chain. Furthermore, the Commission should promote a harmonised implementation across the Union and analyse differences in implementation between Member States.

f) Various implementation practices by economic operators across the Union (method of transmission of information)

[24] As a theoretical example, a box of cod fillets sold to a supermarket with raw material originating from multiple fishing vessels would indicate once the commercial designation, the scientific name, the geographical area, and the fishing gear, while listing multiple fishing trip identification numbers, dates of catches, and quantities.

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As mentioned above, the information note shared by the European Commission on 10 December 2025 provided welcomed clarity on the interpretation of the new requirements on the transmission of information in a digital way.

Nevertheless, the practical implementation of Article 58 of the revised Fisheries Control Regulation, especially in the context of intra-EU trade, can vary across the Union: in the context of business relationships, depending on the destination market, downstream operators might expect or even require the use of a specific method of transmission of information (e.g., email message, electronic file, electronic platform) by the upstream ones[25].

In the view of the MAC, the upcoming study should analyse the implementation practices developed across the Union (e.g., email message, electronic file, electronic platform, advanced systems), including potential impacts for the sector. Furthermore, the Commission should create guidelines that provide information and promote a harmonised interpretation and implementation of the requirements across the Union, including in relation to potential additional delegated acts.

5. Recommendations

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

a) Under the upcoming study on the costs and benefits of the implementation of the Fisheries Control Regulation, take into account:
    i. Expected benefits, such as support to the fight against IUU fishing, enhancement of traceability in supply chains, contribution to the CFP objective of sustainable

[25] For example, French shellfish operators have been required by their trading partners in Italy to transmit the traceability data elements via e-mail message, while, in other destination markets, they have been asked to use other methods of transmission of information.

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management of fishery resources, internalisation of externalities, screening of Key Data Elements from catch to sale by control authorities, facilitation of cooperation between health and fisheries authorities, reduction of sourcing, health, and safety risks, improvements to internal management, digital transmission to retailers, off pack consumer labelling for end consumers (QR codes), and increased confidence across the sector;

ii. Expected costs and related challenges related to the existing regulatory requirements, such as staff adaptation from paper-based transmission to the transmission of information in a digital way, including trainings on data quality and consistency, and investments made by operators on digital traceability.

b) Under the upcoming cost analysis study on the fisheries sector from the perspective of operators, take into account:

   i. Potential implementation challenges and corresponding administrative burdens, such as on possible overlaps with food safety traceability requirements, the exemptions from traceability requirements for small quantities of fishery products, the transmission of the "fishing trip identifier" / "fishing day", the transmission of the information on the common marketing standards, the sector-specific implementation of the concept of "lot", and analyse differences in implementation in Member States.

c) Coordinate with the competent authorities to promote a common interpretation of the market-related requirements of the revised Fisheries Control Regulation across the EU;

d) Provide further guidance documents on the implementation by Member States and by operators of the traceability requirements under the current legal framework of the Fisheries Control Regulation, especially on the definition of mixed/merged lots, the formation of digital lot information on the level of primary production (both fisheries and

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aquaculture), the free accessibility of interoperable systems, and the potential inserting of multiple entries in the data elements required by Article 58;

e) Promote a continuous and structured dialogue with the stakeholders, including via the MAC, to ensure informed decision-making that accounts for the realities of the fisheries and aquaculture supply chain.

There are expectations that, in the medium to long-term, the European Commission, via the empowerments foreseen in the revised Fisheries Control Regulation, will adopt further delegated acts imposing additional rules on traceability and marking of lots. The MAC commits to, as more details are made available by DG MARE, provide additional recommendations to assist in these efforts.

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