

Working Group 2: EU Markets

Minutes

Monday, 23 March 2026 (14:00 – 17:30 CEST)

Zoom

Interpretation in EN, ES, FR

Welcome from the Chair, Stefan Meyer

[Presentation](#)

Adoption of the agenda and of the last meeting's minutes (05.02.26): Adopted

Action points

- State-of-play of the action points of the last meeting - information
- AOB:
 - Secretary General to coordinate with the Secretariat of the Pelagic Advisory Council concerning the proposal for joint advice on Russia.
 - Initiative suspended at the request of the Pelagic Advisory Council.

Traceability

- Presentation of the results of the Commission's questionnaire to stakeholders by Marta Moren Abat (MARE D4)

[Presentation](#)

The Chair highlighted the relevance of the questionnaire circulated by the European Commission, as demonstrated by the high number of submissions from stakeholders. The Chair welcomed the Commission's engagement with the MAC and the willingness to report about the progress as well as on exchanges with the Member States.

Marta Moren Abat (DG MARE) recalled that, following the revision of the Fisheries Control Regulation, the Commission put forward a delegated act, which was originally planned to include two articles on traceability and marking of lots. Following feedback from stakeholders that confirmed that more targeted rules were needed, the European Commission decided to remove the two articles from the draft implementing act given that for implementation of the revised rules in the Control Regulation, the Commission has powers to propose such implementing rules but not the obligation. In December 2025, the European Commission circulated an information note providing clarifications on the understanding of Article 53 of the Fisheries Control Regulation, which included a link to the questionnaire to stakeholders.



Ms Moren Abat explained that, while the revised Fisheries Control Regulation did not impose an obligation to the Commission to adopt a (delegated) act on traceability, the purpose of the questionnaire was to determine the needs to support implementation related to Article 58. The high number of responses illustrated wide response and the fact that the questionnaire reached a high number of stakeholders being able to provide a quite accurate complete result. From initial reaction, the replies to the questionnaire confirmed that there is some confusion among stakeholders on the obligation related to traceability in the fisheries Control Regulation before and after its revision.

Ms Moren Abat informed that 138 companies and associations from the fisheries, aquaculture, seafood transformation and commercialisation sectors had replied to the questionnaire. Among them, 55 were small-scale local organisations, while 83 operated at national or international level. In total, respondents came from 15 Member States, with some companies located outside the EU. In the meantime, DG MARE also held various bilateral exchanges with stakeholders.

Ms Moren Abat, concerning lots, stated that respondents indicated challenges when lots were merged or split, suggesting that further clarification would be advisable. Respondents identified challenges in the implementation of aggregation rules and the standardisation of digital tools. The respondents called for the need of improved interoperability and convergence between the IT tools used by each actor.

Ms Moren Abat, concerning data recording and storage, reported that the majority of respondents declared retaining data between three and five years. More than half of the respondents used both digital and paper format for storage. When only one of the means is used, it is, in 75% of cases, the digital format. The main takeaways indicated the need for coordination and consistent documentation for imported products and catch certificates, and if possible harmonisation between format and reporting tools used by actors,

Ms Moren Abat, concerning digital transmission, reported that 42% of the respondents transmit digitally the information requested in Article 58 (5) to the Member State authorities, and that 54% transmit it to their receiving operators. 28% of the respondents apply some kind of internationally recognised standards, most frequently GS1 and GDST. One of the main takeaways was the call for more harmonised EU-wide data formats and technical specifications, to avoid interoperability problems between suppliers, customers, and authorities.

Ms Moren Abat, concerning marking of lots, reported that 40% of the respondents declared applying internationally recognised standards, while the others indicated the use of company-specific lots numbering systems or national labelling rules or sector-specific practices. The key takeaways were calls for an implementing framework to consider complexities when lots are split, merged, repacked, or relabelled, especially in high volume environments,

Ms Moren Abat informed that the Commission may be working on a draft concept of the content of a potential delegated in the next months. If such act is decided to be done, it will work in cooperation and inclusive process with Member States as usual practice. . A technical discussion with the Member States



would likely take place in April or May 2026 for an initial exchange. The Commission representative expressed availability to maintain the MAC updated but encouraged the members to remain in contact with their national authorities to facilitate communication. Concerning the ongoing study on prepared and preserved products, she informed that, since it was under development, it was too early to draw conclusions. The final report should be available at the end of the year.

- **Exchange of views**

The Chair asked about the possibility of DG MARE sharing draft versions of the act with the MAC, in order to facilitate the development of advice.

Marta Moren Abat (DG MARE) responded that the draft legislation is shared with the Member States in an open, transparent and inclusive process, encouraging the stakeholders to exchange with the Member States. Ms Moren Abat welcomed feedback from stakeholders, including bilaterally, written, or in future meetings, depending on availability.

The Chair requested information on the timeline of the delegated act, including the expected date of effectiveness.

Marta Moren Abat (DG MARE) responded that if deemed necessary to prepare an act supporting implementation the aim was to adopt the delegated act over summer 2026 but the calendar is to be confirmed in the next weeks. Once adopted by the Commission, the act would be subject to a two-month scrutiny period as it is normal procedure for a delegated act.

Patrick Murphy (IS&WFPO) asked for information on the appropriate contacts in the Member States. Mr Murphy also wanted to know the appropriate approach, in case of lack of response.

Adrien Simmonet (UMF) emphasised the importance of exchanges with stakeholders on the transmission of information across the fisheries and aquaculture value chain. On a technical level, for the timing, operators generally referred to the catch date, so it was dependent on the actors of the first sale. In his view, the described approach raised questions on how control authorities managed data. The corresponding processes took time, impacting when information reached the various stakeholders. He encouraged further discussions on the time lapse for sharing of data and the corresponding controls by public authorities.

Marta Moren Abat (DG MARE), on the appropriate contacts, responded that the easiest and direct option is stakeholders contact the experts on control in the Member States.

Ms Moren Abat, mentioned that there is compatibility between IUU obligations and traceability and the implementation rules would help if necessary. The Commission representative recalled that several of the issues raised related to provisions already present in the previous version of the Fisheries Control Regulation.

Sarah Hautier (EuroCommerce) highlighted that, on several occasions, the minimum information requirements were not reaching the retailers. When control authorities carried out checks, downstream operators were not always able to fulfil their obligations. Ms Hautier wondered about the origin of the problem and the potential relevance of postponing the corresponding enforcement, so that all actors had



more time to adapt. She also wanted to know whether guidance on enforcement would be provided to control authorities.

Marta Moren Abat (DG MARE) responded that DG MARE was aware of the challenges. For example, under the IUU Regulation, information was transmitted per consignment, while, under the Fisheries Control Regulation, the information was transmitted per lot. Ms Moren Abat emphasised that it was not possible to postpone the obligations foreseen in the Fisheries Control Regulation and that the Commission does not have powers to amend such obligation by secondary legislation.

Thibault Pivetta (EMPA) wanted to know whether, under the replies to the questionnaire, the specificities of the aquaculture sector, particularly of molluscs production, had been addressed. Mr Pivetta highlighted that professional organisations had several questions regarding the definition of lots at the national level, as interpretations varied. He emphasised the importance of a clear definition covering aquaculture, which should take into account that it relates to live products and different sales methods.

Marta Moren Abat (DG MARE) acknowledged that there was less feedback from aquaculture operators in comparison with other stakeholders. Ms Moren Abat expressed availability to receive feedback from the aquaculture operators. She also encouraged the aquaculture operators to exchange with their national authorities.

Ulysse Pavard (DG MARE) acknowledged that more responses to the questionnaire were received from fisheries than aquaculture operators. Nevertheless, the French aquaculture sector was well represented in the responses. He expressed availability to exchange with aquaculture stakeholders.

Patrick Murphy (IS&WFPO) wondered about the possibility of stakeholders contacting DG MARE directly, instead of only providing feedback via the Member States.

Marta Moren Abat (DG MARE) expressed availability to receive feedback but encouraged the stakeholders to exchange with their Member States.

Patrick Murphy (IS&WFPO) asked for more information on expected penalties due to non-compliance, particularly how the holding up of fresh products had been considered. Mr Murphy also asked for more information on the relevant procedures to address situations of incomplete documentation.

Marta Moren Abat (DG MARE) responded that according to the Control Regulation, the delegated act would be limited to the scope of Article 58.

The Chair highlighted the importance of an overview of the enforcement authorities, providing the example of Germany, which included both federal and regional authorities.

Pier Salvador (COPA COGECA) underscored the importance of exchanges, at the EU-level, with stakeholders, since national authorities did not always share information with their stakeholders. In the case of aquaculture production, it could be particularly challenging due to the involvement of various ministries. Mr Salvador expressed availability to share feedback both at the EU and national level, emphasising the importance of the transmission of information via the Advisory Councils.



Marta Moren Abat (DG MARE) responded that the European Commission could not replace the Member States.

Hommel Kasa (SNCE) highlighted that, in accordance with the Commission's information note, harmonisation on interoperability was not yet a legal requirement. Mr Kasa wanted to know whether it was expected to become a requirement under the future delegated act. He welcomed the openness of DG MARE to receive input, mentioning that information was not always disseminated across the Member States.

Marta Moren Abat (DG MARE) expressed willingness to continue receiving input from the stakeholders. Ms Moren Abat explained that the questionnaire aimed to understand the needs of the stakeholders

- **Way forward**

The Chair asked the members for their views on the development of additional advice on the future delegated act on traceability.

The Secretary General commented that the timelines were rather ambitious for both the Commission services and the members. In practice, it would be difficult to develop advice without having access to the draft text of DG MARE. If a draft was made available by a Member State, it would be easier to launch the work of the Working Group.

Thibault Pivetta (EMPA) expressed support for the development of advice. Mr Pivetta suggested to make use of previous recommendations.

Hommel Kasa (SCNE) argued that, despite the limited timeframe, if it was possible to work on advice, the Working Group should proceed.

The Chair agreed that the development of draft advice should be based on the draft of the delegated act. The Chair suggested that, once a draft became available, the Working Group should initiate the work, which should cover both the text and general points.

The Secretary General commented that, as the next meeting was planned for June 2026, it could be necessary to proceed via a written procedure.

Trade Agreements & Trade Policy Instruments

- **Update on latest trade developments by Kinga Malinowska-Facci (MARE B3), including:**
 - **India (conclusion of Free Trade Agreement)**

Kinga Malinowska-Facci (DG MARE) informed that agreement on the EU-India Free Trade Agreement was reached in January 2026, and the text was undergoing the corresponding legal scrutiny. Following this stage, probably before the full translation, the agreement would be put forward to the European Parliament and the Council for ratification. The Commission was hopeful that the agreement could be finalised by the end of the year but added that it would depend on the corresponding political decisions. Launching the scrutiny phase prior to the complete translation was a new approach, illustrating the geopolitical importance of the trade agreement.



Ms Malinowska-Facci, concerning the content of the agreement, explained that liberalisation for products under Chapter 03 of the Combined Nomenclature was pursued. There was some liberalisation of Chapter 16 products, but sensitive products were excluded. The negotiators on behalf of India focused particularly on shrimp and on cuttlefish. Concerning rules of origin, the classical approach, based on vessel conditions, was pursued. One exception, similar to the one under the EU-Mercosur Free Trade Agreement, was agreed concerning ownership and charge-up vessels. Some limited origin quota protections for shrimp products were agreed but were not expected to be used extensively.

Ms Malinowska-Facci, concerning sustainable development, informed that the corresponding chapter was similar to other free trade agreements, covering both fisheries and aquaculture. The chapter covered cooperation in Regional Fisheries Management Organisations, fight against IUU fishing, and the promotion of sustainable aquaculture. Overall, the Commission was quite satisfied with the chapter, as India was initially reluctant to proceed with it. Nevertheless, unlike in other free trade agreements, the chapter was not covered by the dispute settlement mechanism, reducing the enforceability of the commitments. However, the chapter remained a good platform for cooperation on sustainability matters, including in the context of the corresponding Sub-Committee.

- **Mercosur (decisions on Partnership Agreement and interim Trade Agreement)**

Kinga Malinowska-Facci (DG MARE) informed that, since the previous update, Brazil and Paraguay had ratified the Free Trade Agreement. Three Mercosur countries had completed ratification. On the EU's side, the College of Commissioners validated the provisional application of the agreement. If the exchange of ratification instruments occurred before the end of the month, the agreement would, in accordance with the rules, become effective on the first day of the second month following the exchange. Therefore, implementation could begin as early as May 2026. Ms Malinowska-Facci highlighted that approval by the European Parliament remained pending, as the text was referred to the Court of Justice of the European Union for appreciation. She added that the text of the agreement was available online.

- **USA (internal procedures to implement the Framework Agreement)**

Kinga Malinowska-Facci (DG MARE) recalled that, in the case of the agreement reached with the USA, the implementation was via internal instruments. The implementation by the US administration was impacted by a recent judgment of the Supreme Court. On the EU's side, implementation remained pending the approval by the European Parliament and the Council. Following the situation in Greenland and the mentioned judgement, the European Parliament had suspended the approval process.

Ms Malinowska-Facci emphasised that, politically, in the Commission's perspective, upholding the agreement remained important for the EU, in order to ensure predictability for businesses. Earlier that week, the two legislative texts had been voted by the European Parliament's Committee on Trade, while a vote by the Plenary remained pending. The European Parliament had introduced new elements, including the possibility to suspend the legislation, if the USA does not meet their commitments, and a "sunrise clause", meaning that the legislation would only enter into force if certain conditions were met by the USA.

Ms Malinowska-Facci explained that, following the judgment of the Supreme Court, the US government adopted new tariffs, which were applicable to all third countries. For many products, including fishery and aquaculture products, the new 10% tariff was the same or lower than before. Nevertheless, as the new tariff



applied uniformly to all trade partners, the EU no longer benefited from a privileged trading position in the US market, impacting the competitiveness of EU operators in comparison with operators from third countries. For some products such as canned tuna, under the Most Favoured Nation (MFN) treatment, the tariffs remained quite high.

Ms Malinowska-Facci further explained that the current tariffs were challenged in trade courts due to the allegedly inappropriate legal basis. A hearing on the mentioned challenge was planned for April 2026. Furthermore, the US administration expressed its intention to recreate the previous tariffs via a different legal basis. These new tariffs were based on allegations of overcapacity and forced labour. In the view of the Commission, the EU is not a source of overcapacity, remaining available to collaborate. The EU legislative framework included tools against forced labour, which were applicable to both EU products and products from third countries. In the past, investigations on overcapacity and forced labour allegations took between four to six months to conclude. Nevertheless, it was difficult to predict the timeline of the ongoing investigations, as there had been a change in political will.

- **Exchange of views**

The Chair highlighted that President Trump put pressure on Norway to stop exports of salmon to Norway. The Chair wondered about potential pressures on the EU, including further risks of escalation.

Kinga Malinowska-Facci (DG MARE) responded that the Commissioner received oral confirmation that the USA would like to maintain the agreement reached in 2025. Ms Malinowska-Facci expressed hope that no further pressures would be taking place. From the EU's side, following the amendments put forward by the European Parliament, suspension of the agreement, in the case of escalation, was foreseen. The Commission representative added that she was not in a position to comment on the relationship between the USA and Norway.

The Chair asked whether the Commission would revise the list of tariff lines of the countermeasures against imports from the USA.

Kinga Malinowska-Facci (DG MARE) responded that the mentioned tariffs were suspended until August 2026. The Commission understood that the US administration might require time to rework and reinstate their previous tariff regime. Depending on the two ongoing investigations, the EU could react decisively, if the agreement was not respected. The USA would also be monitoring the implementation of the agreement by the EU, which was also relevant for some fishery products.

Janne Posti (Conxemar), concerning the potential provisional implementation of the EU-Mercosur agreement from 1 May 2026, wanted to know, taking into account the pending approval by the European Parliament, how the Commission assessed the risk that the implementation could be reversed.

Kinga Malinowska-Facci (DG MARE) responded she would not speculate. Nevertheless, if, under the current legislative mandate, the European Parliament decided to hold a vote on the agreement, several political groups expressed to be in favour of the provisional implementation. In her view, with time, the implications of the agreement should become clearer. In the context of previous trade agreements, for example with Korea and with Canada, similar concerns were expressed, which then did not materialise.



Felicidad Fernández (ANFACO-CYTMA) asked for more information on the schedule of market access under the EU-India free trade agreement, including the main exports from India in terms of Chapter 03 products. Concerning the USA, Ms Fernández highlighted that, 150 days following the judgment of the Supreme Court, an additional 10% tariff would be applied. Therefore, canned tuna would face a tariff of 45%. She requested more information on what would happen after the mentioned deadline.

Kinga Malinowska-Facci (DG MARE), concerning the free trade agreement with India, explained that there would be full liberalisation for products falling under Chapter 03 of the Combined Nomenclature. The transition period would take between four to six years, depending on the tariff line. Concerning the USA, Ms Malinowska-Facci stated that Ms Fernández's comments were in line with the Commission's legal assessment. The two ongoing investigations by the USA could potentially be finalised by the mentioned deadline, allowing for a differentiated treatment of the EU. Alternatively, the tariffs would lapse, since these are not renewable, but there was no clear legal text preventing the tariffs being issued again. She acknowledged that there was some uncertainty, but that the Commission remained committed to the agreement reached in 2025, in order to ensure predictability for businesses, while avoiding further penalising products, such as canned tuna, that already faced high tariffs under the Most Favoured Nation treatment.

Daniel Voces (Europêche) wanted to know whether the sustainability chapter under the EU-India Free Trade Agreement included references to the World Trade Organisation's Agreement on Fisheries Subsidies. Mr Voces also wanted to know whether the imminent entry into force of several trade agreements would be taken into account in the proposal of the next Autonomous Tariff Quotas Regulation. Theoretically, through the new free trade agreements, the EU would have access to more raw material.

Kinga Malinowska-Facci (DG MARE) responded that the sustainability chapter was on development cooperation, not fisheries-specific, and did not specifically reference the World Trade Organisation's Agreement. Concerning the next Autonomous Tariff Quotas Regulation, Ms Malinowska-Facci emphasised that the corresponding impact assessment and evaluation were still ongoing. Nevertheless, the proposal would need to consider the overall context.

Ms Malinowska-Facci took the opportunity to inform that there were positive developments concerning the USA's Marine Mammal Protection Act. The previous year, most EU Member States received their certification of comparability, but the certification of Ireland remained pending. The previous week, Ireland was certified. The Commission representative emphasised that this provided a stable reference moving forward.

CATCH

- **Presentation of proposal of draft advice on the implementation of CATCH by Katarina Sipic (Seafood Europe)**

[Presentation](#)

Katarina Sipic (Seafood Europe) explained that the document was divided into several sections, covering contextual and strategic elements, operational challenges, and a set of recommendations. Ms Sipic underscored that the implementation of CATCH was a key priority for business operators. Its development was essential to provide a system fit for achieving the objectives of the legislation. She recalled that 98% of the sector is composed of SMEs and that the EU's position as a net importer amplified some vulnerabilities.



Ms Sipic emphasised the importance of interoperability under the new digital system. In practice, operators were facing an increase in manual data entry, instead of automation. At the beginning of the implementation of the new system, the Single Market was disrupted. The document aimed to illustrate the supply chain dynamics, particularly the gap between real-world logistics and the assumptions built into the system. She indicated the level-playing-field was disrupted under the current implementation of CATCH. In terms of governance, she called for a more efficient framework, including through a better use of the Single Liaison Office (SLO) network.

Ms Sipic argued that the recommendations section included pragmatic measures to stabilise operations and guarantee legal certainty, while also seeking more structural improvements to the design and governance of the system. She emphasised that, since 10 January 2026, there were major asymmetries in the preparedness of the Member States as well as on the interpretations followed, resulting in different solutions in practice. At the same time, the majority of third countries remained outside of the system, creating a structural imbalance with significant consequences for the implementation of CATCH. EU operators faced a disproportional increase in the administrative burden.

Ms Sipic highlighted that SMEs, which form the backbone of the EU's fisheries and aquaculture value chain, were being forced to divert core operational staff towards manual administrative tasks, in order to maintain compliance. She outlined several of the main issues identified, including governance inconsistencies, divergent legal interpretations, regulatory scope and alignment problems, lack of interoperability, data quality concerns, burdensome data entry, and IT shortcomings, including missing master data.

Ms Sipic informed that, prior to the drafting of the proposal, her organisation met with the European Commission. The Commission appeared to be taking the main issues seriously, but there were still varying implementation speeds and approaches across the Member States. In her view, the primary focus of the advice should be on legal certainty, particularly under the *de facto* transitional phase. Digital submissions should remain as the default approach. Nevertheless, when digital submission was not possible, there should be a way to ensure legal certainty, while having compliant trade without disruption. She provided an overview of the key recommendations in her proposal.

- **Consideration of the proposed draft advice**

Daniel Voces (Europêche) expressed full support for the proposal. In his view, the MAC should continue to monitor the implementation of CATCH closely, as he was aware of several cases of difficulties faced by the EU fishing fleet, particularly concerning exports.

Marine Cusa (Oceana) expressed general support for the proposal, as identified problems required solutions in a prompt manner. Nevertheless, there were some points in the document that her organisation did not support. Ms Cusa requested the launch of a written procedure to allow a constructive exchange between the various concerned members.



Matthew Gréant (EJF) expressed agreement with Ms Cusa. In his view, the proposal was very relevant. While he understood the importance of proceeding promptly, Mr Gréant requested for additional consideration of the document via a written procedure.

- **Way forward**

The Secretary General recalled that, under the Rules of Procedure, the deadline for consultations via ordinary written procedure was of two weeks. The Rules of Procedure also foresaw the possibility of urgent written procedures. In that case, the minimum period was of three working days for the consultation of the Working Groups. He encouraged the members to share their views on the preferred timeframe.

The Chair proposed to proceed with an ordinary written procedure. In case of comments, the following consultations would be as urgent written procedures.

Illegal, Unreported and Unregulated Fishing

- **Presentation of the IUU Fishing Coalition’s guide “The Fisheries Import Control Scheme Handbook” by Thomas Walsh (IUU Fishing Coalition)**

Presentation

Thomas Walsh (IUU Fishing Coalition) explained that the IUU Fishing Coalition, established in 2014, is composed of five NGOs and aims to promote transparency as a tool to combat illegal, unreported and unregulated (IUU) fishing. The Fisheries Import Control Scheme Handbook was developed collaboratively with their counterparts in the United States and Japan. These three coalitions worked jointly to encourage major seafood markets to use their market power to drive improvements against IUU fishing. He added that all of these large market States operate import control schemes, and that the Coalition sought to support their development and improve harmonisation across the three regions.

Mr Walsh highlighted that the EU operates the most extensive catch certification scheme in terms of species coverage. Recent legislative revisions, including those entering into force on 10 January 2026, expanded data collection requirements. The USA operates the Seafood Import Monitoring Program, while Japan adopted a new catch documentation scheme in 2022, largely inspired by the EU model but somewhat more restrictive. Korea also operates a catch documentation scheme, currently limited to three species, and the UK retained its catch documentation system after leaving the EU.

Mr Walsh provided an overview of previous research carried out by the Coalition. In April 2025, the Coalition published a comparative report identifying 17 baseline Key Data Elements (KDEs) that should be collected by import control schemes. These KDEs cover the “who, what, where, when and how” of fisheries production. He explained that the EU now requires all 17 KDEs, particularly after the new CATCH system entered into force in January 2026. The USA and Japan each require 12 KDEs; Korea requires all 17 but only for a limited number of species and vessels; and the UK requires 13 KDEs under its system.

Mr Walsh argued that the ongoing divergence risked creating incompatible systems. For the Coalition, any new data requirements adopted internationally should be harmonised, and existing systems should be aligned to the 17 KDEs as a minimum baseline. He emphasised that harmonisation was essential to avoid enforcement gaps, ensure interoperability, prevent exploitation by bad actors, and maintain a level playing



field for EU operators. The growing complexity of diverging schemes made compliance difficult for operators and imposed unnecessary costs on international supply chains.

Mr Walsh outlined a recommended scope and operational best practices. These included ensuring 100% species coverage (which is not currently the case across all schemes), requiring all data to be submitted in digital format due to the fraud and administrative burdens associated with paper documents, applying robust and targeted risk assessment procedures, and enabling data exchanges between market States. He stressed that import control systems should not operate in isolation. Mr Walsh also referred to several complementary developments that strengthen the verifiability of data, such as monitoring, control and surveillance tools, electronic logbooks, vessel tracking, observers and electronic monitoring. He highlighted the importance of accurate and verifiable information collected at the point of catch. Improved transparency, aligned with the Global Charter for Fisheries Transparency, was essential.

Mr Walsh highlighted that many large market States globally still did not have catch documentation schemes, and, therefore, a large share of international seafood trade remained uncovered. Part of the purpose of the Handbook was to provide guidance, best practices and lessons learned, particularly from the EU, as CATCH was considered the most comprehensive system. Mr Walsh outlined the five key stages of import control scheme development: scoping, design, implementation, assessment and review, stressing that authorities must regularly assess whether their catch documentation scheme is well designed and effectively implemented. He emphasised the importance of regular coordination with stakeholders, including importers, to identify and address operational barriers.

- **Exchange of views**

The Chair highlighted that, according to the document, the EU's system remained the most comprehensive, including in comparison with the USA and Japan, and welcomed the ambition for harmonisation. The Chair recalled that, when CATCH was introduced, DG MARE undertook significant efforts to train the competent authorities of several third countries, while promoting interoperability with their national systems. In his view, it seemed counterintuitive that countries, such as South Africa, would not be able to follow on the IUU Coalition's recommendations, when already complying with CATCH for EU exports. He wanted to know whether the Coalition looking into third countries exporting to the EU. Building on existing infrastructures, moving towards a more harmonised and simpler export system, could incentivise a wider update of the EU-aligned approach.

Thomas Walsh (IUU Fishing Coalition) responded that the IUU Coalition had limited engagement with the administrations, but that it was exchanging with NGOs from third countries. The market States continued to have the right to request data in relation to imports. In his view, many developing market States should have systems that can engage with CATCH. Several companies were implementing the systems themselves. He expressed expectation that interoperability would continue to be strengthened.

The Chair emphasised that it was important to keep in mind the responsibility for providing the data and the responsibility for ensuring the corresponding reliability, as enforcement was a responsibility of the public authorities. The Chair wanted to know Mr Walsh's views on the involvement of private operators, including private schemes, in the promotion of interoperability.



Thomas Walsh (IUU Fishing Coalition) clarified that the flag State is responsible for checking the data, verifying and validating. Nevertheless, companies played a role, as the data is aligned and traceable throughout the supply chain. The competent authorities should remain responsible for the control of imports. The exact authority depends on the organisation of each State.

The Chair asked about the Coalition's timeline to convince third countries to implement comprehensive import controls schemes. In his view, the Coalition should also focus on the exporting States.

Thomas Walsh (IUU Fishing Coalition) responded that the ambition was quite high, building on the lessons learnt from the 15 years of the EU's system. The Coalition was starting from the market States where there were already existing contacts. Mr Walsh highlighted that there were multiple steps prior to a system being put in place. He provided the example of Australia, where discussions on the development of an import control scheme were delayed due to the political cycle. Nevertheless, by 2030, he would like to see commitments from further States to start the process, plus further harmonisation of the existing systems.

The Chair exemplified that South Africa used a national system to digitally produce the necessary documents for export to the EU. Therefore, there were potential synergies that could be pursued.

Due Diligence

- **Exchange of views on the revision of the Corporate Sustainability Due Diligence Directive and the upcoming sector-specific reporting standards**

The Secretary General emphasised the importance of the due diligence legislation for the European Commission and for the MAC. The due diligence rules were referenced in the MAC's annual work programme and in several previous pieces of advice but had not yet been addressed in dedicated advice. He encouraged the members to share their views on the appropriate way forward.

The Secretary General explained that the Corporate Sustainability Due Diligence Directive (CSDDD) imposes obligations on companies to carry out environmental and human rights due diligence. These obligations include the identification of adverse impacts, preventing and mitigating such impacts, providing remediation, implementing grievance mechanisms, as well as public reporting and supervision. In 2025, the Directive was amended by the first Omnibus Regulation, which modified the thresholds for companies subject to the obligations. Following the amendments, the Directive would be applicable to companies with more than 5,000 employees and a net worldwide turnover of more than €1.5 billion. The Omnibus Regulation removed the specific applicability to "high-impact sectors", which included "agriculture, forestry, fisheries" sector. Compliance was set from July 2029 onwards.

The Secretary General further explained that the Corporate Sustainability Reporting Directive (CSRD) required companies to publish sustainability information in management reports, in accordance with standardised EU reporting rules. The Directive would apply to companies with over 1,000 employees and €450 million turnover. The CSRD implies the developing of European Sustainability Reporting Standards, together with sector-specific reporting standards. These standards set the technical reporting rules on environmental, social and governance topics, for example on climate change, pollution, water and marine resources, biodiversity and ecosystems, resource use and circular economy, and workforce and human rights.



The Secretary General highlighted that the European Financial Reporting Advisory Group was developing sector-specific standards for "Agriculture, Farming, and Fisheries", which included aquaculture, as one of eight "priority sectors". The sector-specific standards were expected to cover impacts on marine ecosystems, fish stock sustainability, aquaculture nutrient pollution, biodiversity impacts, water & feed use, labour conditions on fishing vessels, forced labour risks, occupational safety. The adoption of these sector-specific standards was originally planned for June 2026, but the work remained at a research or early drafting stage. While working papers were publicly available, no formal stakeholder consultations had been launched. He commented that, following the Omnibus Regulation, the next steps remained unclear.

The Secretary General recalled that, under the work programme of year 10 (2025-2026), there was a commitment to adopt advice on "on the fight against Illegal, Unreported and Unregulated (IUU) fishing, forced labour and due diligence". He outlined several issues that could be addressed in future advice, in case the Working Group decided to proceed ahead, namely applicability and "trickle-down" effect of the CSDDD the fisheries and aquaculture value chain; specific reporting standards on fisheries and aquaculture under CSRD; connection to sectorial legislation (e.g., IUU Regulation and CATCH, Fisheries Control Regulation and traceability requirements) and other legislation (e.g. Forced Labour Regulation); and implementation period.

- **Way forward**

The Chair encouraged the members to share their views on the most added value for the development of substantial and focused advice by the MAC.

Laure Guillevic (WWF) requested more information on the timeline, including exchanges and coordination with the European Commission, in order to guide the future work.

Gerd Heinen (DG MARE) informed that, in the European Commission, the lead service for the CSDDD was DG JUST, while the lead service for the CSRD was DG FISMA. While both directives were horizontal in nature, these were being addressed separately. Mr Heinen stated that both services were quite busy, but expressed availability to check the availability of his colleagues in DG FISMA.

The Chair emphasised the overarching nature of the topic. Many companies and secondary stakeholders would be expected to comply with the reporting standards, but without fully understanding the specificities of the fisheries and aquaculture value chain. In his view, without a sufficient understanding of the realities of the sector, it would be challenging for the relevant institutions to design procedures and recommendations that are tailored and fit for purpose. He highlighted that the MAC has a strong understanding of the realities of the fisheries and aquaculture supply chain, which meant that the Advisory Council could provide specific added value. The MAC's expertise could support both Commission services in better understanding the specific characteristics and constraints of the sector.

The Chair suggested that it would be useful to have a clearer picture of the work being carried out by the European Financial Reporting Advisory Group on sector-specific standards. He proposed exploring whether contact with DG FISMA and with the Advisory Group would be relevant, in order to better understand the current state-of-play and to assess whether providing sector-specific information and background information from the MAC could be beneficial.



The Secretary General expressed availability to contact DG FISMA and the EFRAG via email message to request more information, including the potential scheduling of an exchange of views at a future meeting.

AOB

- **Draft Advice on “Addressing Risks in Global Squid Fisheries”**

Daniel Voces (Europêche) recalled that a written consultation had been launched for the consideration of draft advice on “addressing risks in global squid fisheries”. In his view, since the document referenced fishing practices and Regional Fisheries Management Organisations, it could be relevant to consult the Long Distance Advisory Council to proceed with joint advice.

The Secretary General suggested that, following the conclusion of the already ongoing first written consultation, the Secretariat could contact the Secretariat of the Long Distance Advisory Council. The Secretary General mentioned that joint consideration would require additional time, but there did not seem to be a particular urgency in the adoption of the advice.



Summary of action items

- Traceability
 - Once an initial draft of the delegated act is available, Working Group to proceed with the development of advice – if necessary, via written procedure.

- CATCH
 - Based on the proposal from Seafood Europe, draft advice on the implementation of CATCH to be considered via an ordinary written procedure and, if needed, to be followed by followed by urgent written procedures.

- Due Diligence
 - Secretariat to collect additional information on the state-of-play of the upcoming sector-specific reporting standards, including through the potential scheduling of exchanges with DG FISMA or the EFRAG.

- AOB
 - Secretary General to contact the Secretariat of the Long Distance Advisory Council for the potential joint consideration and adoption of the draft advice on “addressing risks in global squid fisheries”.



Attendance List

Representative	Organisation	Role
Adrien Simonnet	UMF	Member
Alen Lovrinov	Production Organization Omega 3	Member
Alessandro Manghisi	Aquaculture Stewardship Council (ASC)	Member
Alexandre Bonneau	SNCE	Member
Amandine Menu	PACT'ALIM	Member
Andrea Fabris	Associazione Piscicoltori Italiani (API)	Member
Angeles Longa	EMPA	Member
Angels Segura Uni6	AECOC	Member
Anna Rokicka	Polish Association of Fish Processors	Member
Antoine Galichon	European Parliament	Observer
Aodh O'Donnell	Irish Fish Producers Organisation (IFPO)	Member
Arthur Yon	FROM Nord	Member
Bertrand Charron	Aquaculture Stewardship Council (ASC)	Member
Caroline Gamblin	PACT'ALIM	Member
Chlo6 Pocheau	South Western Waters Advisory Council (SWWAC)	Observer
Claudio Pedroni	Associazione Piscicoltori Italiani (API)	Member
Cl6mence Robert	France	Observer
Corine Vroom	Visfederatie	Member
Daniel Voces de Onaindi	Europ6che	Member
Daniela Costa	Outermost Regions Advisory Council (CCRUP)	Observer
Dominic Rihan	Killybegs Fishermen's Organisation	Member
Emiel Brouckaert	EAPO	Member
Felicidad Fern6ndez	ANFACO-CYTMA	Member





Market Advisory Council

Representative	Organisation	Role
Gerd Heinen	European Commission	Expert
Giorgio Rimoldi	Unione Italiana Food	Member
Grace Howe	The Nature Conservancy (TNC)	Member
Guus Pastoor	Seafood Europe	Member
Huw Thomas	Global Dialogue on Seafood Traceability	Member
Iñigo Azqueta	ANFACO	Member
Ioannis Pelekannakis	HAPO	Member
Jacob Armstrong	WWF	Member
Janne Posti	CONXEMAR	Member
Javier Ojeda	FEAP	Member
Jean-Marie Robert	Les Pêcheurs de Bretagne PO	Member
Jens Høj Mathiesen	Danish Seafood Association	Member
Jérémie Souben	FEDOPA	Member
João Pereira	FRUCOM	Member
John Lynch	ISEFPO	Member
José Basílio Otero Rodríguez	Federación Nacional de Cofradías de Pescadores	Member
José Carlos Escalera	FECOPESCA	Member
Jules Danto	EAPO	Member
Julien Lamothe	ANOP	Member
Katarina Sipic	Seafood Europe	Member
Kinga Malinowska-Facci	European Commission	Expert
Laura Harpøth Espensen	EFFOP - Marine Nutrients Europe	Member
Laure Guillevic	WWF	Member
Linda Zanki Duvnjak	RZ Friska Riba P.O.	Member



Representative	Organisation	Role
Linne Verhoeven	Seafood Europe	Member
Manon Benlolo-Stoffel	France	Observer
Margot Angibaud	Europêche	Member
María Luisa Álvarez Blanco	FEDEPESCA	Member
Marine Cusa	Oceana	Member
Marta Moren Abat	European Commission	Expert
Matthew Gréant	Environmental Justice Foundation	Member
Mike Turenhout	Visfederatie	Member
Nicolás Fernández	OPP72	Member
Nídia Leal	Outermost Regions Advisory Council (CCRUP)	Observer
Nino Jikia	EuroCommerce	Member
Patrick Murphy	IS&WFPO	Member
Pedro Hernández Saez	CARBOPESCA OPP 66	Member
Pedro Luis Casado López	Asociación Armadores Punta del Moral	Member
Pia Maria Steinke	EuroCommerce	Member
Pier Salvador	COPA COGECA	Member
Pierandrea Leucci	European Commission	Expert
Pim Visser	NOVA	Member
Pedro Reis Santos	Market Advisory Council	Secretariat
Poul Jensen	Danish Seafood Association	Member
Roberto Alonso	ANFACO-CYTMA	Member
Sarah Hautier	EuroCommerce	Member
Sergio López García	OPP Puerto Burelo	Member
Stefan Meyer	Seafood Europe	Chair



Representative	Organisation	Role
Tamas Eisenbeck	Seafood Europe	Member
Thibault PIVETTA	EMPA	Member
Thomas Kruse	Danish Pelagic Producer Organisation	Member
Thomas Walsh	EU IUU Fishing Coalition	Expert
Ulysse Pavard	European Commission	Expert
Violaine De Neef	Market Advisory Council	Secretariat
Yobana Bermúdez	Seafood Europe	Member

