



Advice

Operational Stabilisation and Strategic Alignment of CATCH – Ensuring proportionality, legal certainty, and market stability

Brussels, 31 July 2026

1. Background and strategic objective

The Market Advisory Council (MAC) reaffirms its support for the objectives of the EU system to prevent, deter and eliminate illegal, unreported and unregulated (IUU) fishing, including through enhanced traceability, transparency and harmonised controls across seafood supply chains. The digitalisation of catch certification procedures through CATCH represents an important step towards strengthening the effectiveness and consistency of import controls within the Union and creates a significant opportunity to align digital information handling for imports with the future EU Single Window Environment for Customs (EU SWE-C).

Following the entry into mandatory use of CATCH on 10 January 2026¹ under the revised IUU framework, operators and competent authorities across the Union have entered a new implementation phase requiring rapid operational adaptation. The MAC acknowledges the efforts undertaken by the European Commission, Member States, third countries, and operators to support the deployment of the system.

¹ Regulation (EU) 2023/2842 of the European Parliament and of the Council amending Council Regulation (EC) No 1005/2008 (the “IUU Regulation”) and Council Regulation (EC) No 1224/2009 (the “Fisheries Control Regulation”). CATCH became mandatory for EU operators and import control authorities on 10 January 2026. Catch certificates validated, endorsed or signed before that date may be used by importers until 10 January 2028.

At the same time, Food Business Operators (FBOs) have identified a number of recurring operational, technical and administrative challenges arising during the early implementation phase, particularly affecting supply chains dependent on time-sensitive imports and complex sourcing structures, characteristic of long value chains. The same has been identified and reported by Member States². The MAC considers that the long-term success of CATCH depends on ensuring operational stability, proportionate and consistent implementation across the Union, legal certainty for operators and authorities, and the progressive development of interoperability both within the Union and with relevant third-country systems.

The FBOs stress that the identified operational challenges concern implementation and workflow efficiency and should not be interpreted as a request to weaken EU IUU controls or traceability objectives.

2. Operational realities observed during early implementation

Stakeholders highlight that operational realities of CATCH's implementation can be grouped into four overlapping areas: administrative burden on operators, technical limitations of the system, supply chain and logistics impacts, and divergence in implementation across Member States.

a) Administrative burden on operators

Operators report significant administrative workload linked to the manual transcription of third-country documentation into CATCH. It is reported that processing a single catch certificate may require between 50 minutes and several hours, increasing the risk of retranscription errors and requiring the reallocation of operational staff to compliance-related tasks. The issue is the cumulative administrative burden created by repeated manual handling of already documented

² Meetings of the Council in the AGRIFISH configuration of [26 January 2026](#) ("AOB: Fisheries control") and of [30 March 2026](#) ("AOB: CATCH").

information (see annex, example 1 and 2), not the absence of traceability or supporting documentation.

Operators further report that information entering catch certificates must subsequently be re-entered manually into processing statements and importer declarations, with no automatic transfer of data between stages. These repeated workflows create disproportionate burdens and risk of introducing manual transcription errors.

b) Technical limitations of the system

Reported technical limitations affecting the use of CATCH include missing or restrictive master data entries, validation constraints related to species codes, fishing gear types, vessel information or address formats, remaining technical bugs, and limited visibility of draft workflows. The absence of effective system-to-system interoperability results in duplicate data handling and continued reliance on manual processes, despite the digitalization objective of the framework.

- Example A: A single export consignment of frozen sockeye salmon loaded into 22 refrigerated containers involved product collected through 44 tender vessels from 454 fishing vessels and supported by 2,970 official fish-ticket records. The current system's practical limit of 26 vessels per certificate further illustrates the mismatch between the system's capacity and operational reality in supply chains that may at times involve more than 600 vessels. The challenge here is the practical difficulty of reproducing highly granular vessel-level and ticket-level information manually within shipment-level workflows (Annex, example 1), not the absence of traceability information.
- Example B: Operators report a mismatch between the gear classification used by CATCH and the gear categories defined under Regulation (EU) No 1379/2013 on consumer

information for fishery products. CATCH requires fishing gear selection using ISSCFG 2016 abbreviations (e.g., “TM” for midwater trawl), which are not fully aligned with the gear categories used under that Regulation. According to members, this can result in catch certificates containing gear terminology not explicitly recognised under the EU legal framework, generating legal ambiguity and potential downstream labelling and compliance issues for operators relying on catch certificate data in subsequent EU market documentation.

- Example C: Operators report so-called “silent failures” in the workflow: operators receive insufficient feedback at the draft stage, and competent authorities cannot systematically monitor drafts in real time. Issues therefore become apparent only once transport is underway, or consignments arrive at the border, at which point rectification carries disproportionate cost. The MAC notes that, while CATCH is reportedly integrated within TRACES, operators and authorities continue to report operational frictions linked to workflow integration and information handling across systems.

c) Supply chain and logistics impacts

The fisheries sector relies heavily on efficient and time-sensitive logistics in a sector that relies on long, complex and highly specialised value chains. A particular impact is reported for fresh and chilled products. According to operators, delays linked to technical validation issues, incomplete master data or administrative bottlenecks affect logistics planning, customs clearance, and product handling. In the case of perishable products, members report that delays reduce product freshness, shorten shelf life, and increase the risk of food waste.

Operators report additional operational costs linked to delays in clearance procedures, including storage costs, demurrage charges, additional container rental costs and contract disruptions. According to feedback from operators in certain Member States, such delays may extend over

several weeks in complex cases, with costs amounting to €100.000³. Members also report indirect costs where consignments are ultimately redirected to non-EU markets.

d) Divergence in implementation across Member States

FBOs report on differences in implementation practices and operational readiness across Member States. According to operators, divergent interpretations of documentation requirements and varying implementation approaches reportedly create legal uncertainty and operational unpredictability. Members also report that technical issues and system disruptions are not always resolved at the same pace across Member States. Where CATCH is perceived as less reliable or less predictable at certain points of entry, there may be a risk of diverting consignments to other ports, gradually distorting trade flows within the Single Market.

- Example D: In the Netherlands and Germany, veterinary and CHED⁴ procedures can only commence after CATCH approval is completed, creating a sequential control process. By contrast, in Denmark, CATCH and veterinary controls are processed independently and in parallel. According to operators, the sequential approach generates additional delays for time-sensitive imports, particularly for short shelf-life products, and increases administrative burden at border control posts without strengthening the substantive IUU control.

In parallel, the EU has more than 140 trading partners, however, as most third countries currently remain outside the digital workflow, the burden of data digitisation falls predominantly on EU

³ [Marielle Marie, "Catch certificates: Europe in disarray," Actualités](#)

⁴ CHED under Regulation (EU) 2017/625 (Official Controls Regulation). Common Health Entry Document, established under Regulation (EU) 2017/625 of the European Parliament and of the Council on official controls and other official activities. CHEDs are issued via the TRACES system and must accompany consignments of animals and goods entering the Union through designated border control posts.

operators⁵. This creates administrative cost asymmetries for EU operators and may weaken the competitiveness of certain processing activities within the Union. The MAC, therefore, considers that the progressive development of interoperable workflows and technical cooperation with relevant third countries will be important for the long-term effectiveness and operational feasibility of CATCH.

3. Structural priorities for the long-term success of CATCH

a) Interoperability and digital integration

The MAC considers that interoperability should become a central component of the CATCH architecture. Operators note that current workflows rely heavily on manual data re-entry, including in situations where information already exists in third-country or private digital systems. Members emphasise that highly documented and legally compliant seafood supply chains have nonetheless become operationally difficult to process where information already available in existing documentation must be repeatedly re-entered manually into different systems or workflows. The technical possibility for automatised text recognition from paper-based documents (OCR), an automatised pre-filling of entry-fields based on text-recognition and AI-based entry-field recognition as well as the possibility for structured data import and export from CATCH (e.g., as xml-file) should be foreseen in the next version builds of CATCH⁶.

⁵ Data aggregated from <https://eumofa.eu/weekly-eu-import>

⁶ On 9 March 2026, the European Commission launched the [TraceMap traceability tool](#), an AI-powered tool to help speed up the detection of food fraud and foodborne incidents and outbreaks. The tool allows the use of AI to introduce data, including handwritten, from documents into TRACES. Therefore, synergies should be pursued to integrate a similar possibility for the introduction of data from catch documentation.

In this context, the MAC highlights the relevance of the future development of the EU Single Window Environment for Customs and the future business-to-government (B2G) interface foreseen under Article 3 of Regulation (EU) 2022/2399⁷.

The MAC considers that future technical developments of CATCH should remain strictly aligned in timing and scope with the adoption of the relevant legal acts and the gradual introduction of the B2G interface, to avoid *de facto* obligations without a clear legal basis. Technical requirements in CATCH should not anticipate or replace political and legislative decisions on data submission, responsibilities and liability under the Single Window framework. A legally sequenced and coordinated rollout is essential to provide legal certainty, operational feasibility and trust for operators across the supply chain. To facilitate seamless system-to-system interoperability and data exchange, consideration should be given to the adoption of globally recognised data standards, such as GS1 / EPCIS and the data standards developed by the Global Dialogue on Seafood Traceability for the sector of fishery and aquaculture products.

b) Harmonised implementation and legal certainty

The MAC considers that consistent implementation across Member States is essential for ensuring both effective controls and predictable business conditions. Members stress the importance of harmonised guidance, regular coordination between competent authorities, and a clear distinction between legal obligations established under the IUU framework and technical or operational system design choices.

⁷ The Regulation foresees the integrated submission of information by economic operators, but leaves the concrete implementation, timing and technical modalities of the B2G interface to subsequent Commission implementing acts, by December 2031, as foreseen under Regulation (EU) 2022/2399. Regulation (EU) 2022/2399 establishing the European Union Single Window Environment for Customs. The Business-to-Government (B2G) scheme is to be implemented nine years after the date of application of the Regulation (12 December 2022), i.e., by December 2031, through subsequent Commission implementing acts.

The network of Single Liaison Offices (SLOs) plays an essential coordinating role in this respect. Members note, however, that SLOs are in several Member States staffed by very small teams — in some cases a single officer — and that national IUU teams more broadly appear under-resourced relative to the operational demands of the new digital framework. The MAC considers that adequate staffing and resourcing of SLOs and associated competent authorities is a precondition for harmonised implementation, timely resolution of technical issues, and effective exchange of best practices across the Union.

On the legal obligations side, members report instances where documentation requirements linked to re-export or processing operations have been interpreted inconsistently across Member States, creating uncertainty regarding the scope of catch certificate obligations. The MAC considers that the Commission should provide explicit clarification of the legal scope of catch certificate obligations under the IUU framework, so that operators and authorities can rely on a consistent reading across Member States.

On the technical and administrative side, the MAC considers that, during the ongoing operational stabilisation phase, pragmatic and proportionate approaches may be necessary in situations where strictly technical or administrative issues do not affect the substantive assessment of IUU risk or the traceability of products. Such proportionate treatment should be explicitly transitional, limited to errors arising from the manual digitisation of third-country paper documentation, and should in no way reduce the effectiveness of substantive IUU controls.

c) Market resilience and competitiveness

The fisheries value chain is highly integrated and dependent on stable logistics and predictable import procedures. According to members of the MAC, prolonged operational inefficiencies will create disproportionate burdens for EU operators, particularly SMEs and operators handling complex or multi-origin consignments. Members stress the importance of ensuring that

digitalisation contributes to simplification and operational efficiency, while maintaining the integrity of IUU controls and traceability objectives.

The MAC notes that the long-term credibility and effectiveness of CATCH depend not only on the robustness of controls, but also on the practical usability and operational reliability of the system for authorities and operators alike.

4. Recommendations

In the context of the implementation of CATCH, the MAC considers that the European Commission should:

- a) Provide additional harmonised guidance to ensure legal certainty and proportionate implementation during the ongoing operational stabilisation phase, including clarification on the application of requirements in situations affected by transitional, technical or administrative constraints, limited to errors that do not affect the substantive assessment of IUU risk or product traceability. The MAC considers that harmonised implementation and coordinated operational guidance are essential to preserve the integrity of the Single Market and ensure equal treatment of operators across the Union. Divergent implementation practices risk fragmenting import procedures within the Single Market and creating unequal operational conditions between ports and Member States.
- b) Strengthen coordination between the European Commission, Member States and SLOs, including through regular technical exchanges aimed at promoting harmonised implementation, exchange of best practices, and rapid identification of operational issues. The MAC also invites the Commission to support Member States in ensuring adequate staffing and resourcing of SLOs and national IUU teams. In clearly documented situations involving technical or administrative system constraints, a documented manual verification procedure in line with the provisions of Article 12c of the IUU regulation

(contingency arrangements) should be available to maintain trade continuity while preserving the integrity of IUU controls.

- c) Prioritise the remediation of operational shortcomings identified by operators and authorities, including missing master data, restrictive validation rules, alignment of gear classification codes between CATCH (ISSCFG 2016) and Regulation (EU) No 1379/2013. Focus should be on workflow visibility limitations, specifically the “silent failure” issue, affecting draft workflows and other remaining technical bugs. Operators should have access to clear, structured channels for reporting recurring operational issues.
- d) Support the progressive development of full system-to-system interoperability, including with future Business-to-Government interfaces under the EU Single Window Environment for Customs framework, in line with Article 3 of Regulation (EU) 2022/2399 — with the objective of reducing duplicate data entry, improving administrative efficiency and facilitating the handling of complex but fully documented supply chains. In this context, the MAC also further encourages the Commission to pursue structured bilateral technical exchanges with relevant third countries and regional authorities, including major seafood exporting partners, to facilitate interoperability, improve mutual understanding of traceability architectures and support workable digital integration pathways.
- e) Introduce operational functionalities enabling delegated actions within CATCH, allowing authorised representatives, including customs agents, freight forwarders and Producer Organisations, to perform specific tasks on behalf of operators where appropriate, to address the documented administrative overload, particularly on SMEs.
- f) Ensure that future major technical upgrades or developments include structured, time-bound operational testing involving representative operators (including SMEs) and a range of supply-chain configurations, so that practical implementation constraints, costs and proportionality issues are identified before mandatory deployment.



These measures should support the effective implementation of CATCH while preserving the integrity of EU IUU controls and traceability objectives.

Annex - Illustrative operational examples reported by operators

- **Example 1**

<u>Level</u>	<u>Number in sentence</u>	<u>Meaning</u>
Shipment	1	One export consignment
Containers	22	Refrigerated logistics units carrying the frozen product
Tenders	44	Collection vessels that received fish from harvesting vessels
Fishing vessels	454	Vessels that caught the fish
Fish tickets	2,970	Official Alaska harvest/landing records linked to the product

This is a real-life example of a single export consignment of frozen sockeye salmon, loaded into 22 refrigerated containers, which was not sourced from one vessel or one landing. It represented aggregated product collected through 44 tender vessels from 454 fishing vessels and supported by 2,970 official Alaska fish-ticket records. This illustrates that vessel-by-vessel and ticket-by-ticket data entry at shipment level can become operationally unworkable, even where the underlying fishery is lawful, documented and subject to public oversight.

- **Example 2**



The photo illustrates the paperwork that must be manually entered into CATCH for three consignments to the EU from a Peruvian squid exporter.