



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/B4/DK

Dear Ms Bermudez,

Thank you for your recommendation on Operational Stabilisation and Strategic Alignment of CATCH – Ensuring proportionality, legal certainty, and market stability.

I would like first to acknowledge the contribution of the Market Advisory Council in identifying avenues for strengthening the EU digital tool for catch certification CATCH for the purpose of harmonised and effective import controls to protect the EU market from products stemming from illegal, unreported and unregulated (IUU) fishing and ensure a level playing field.

CATCH is a flagship of the European Ocean Pact and a game changer for our policy against IUU fishing that reaffirms EU's global leadership. In September, we reached the symbolic 100.000th importer declaration validated in CATCH, which is the result of joint efforts of the Commission, Member States and EU operators.

The Commission's objective remains to continue developing CATCH to achieve its full potential while improving user-friendliness and reducing administrative burden. Since the launch of CATCH, developments have taken place through one major release and 10 patches in TRACES NT, and one more major release is planned this year.

We are also expanding our engagement with non-EU countries to promote the direct use of CATCH or the interoperability with comparable national IT systems. The list of countries interested in direct use is growing. To help build their capacity, DG MARE has organised 2 hands-on regional seminars for national authorities – for ASEAN countries (in September 2025) and for West African Countries in May 2026. A seminar for Central and South American countries is scheduled at the end of November, and others will follow in 2027.

I take the opportunity to recall that EU operators and non-governmental organisations are well placed to globally promote the use of CATCH and the new requirements of the EU catch certification scheme. EU importers are the first actor in the import control chain – it

Ms Yobana Bermudez
Chair
Market Advisory Council
yobana.bermudez@conxemar.com
Regus EU Commission
6 Rond-Point Robert Schuman
1040 Brussels
BELGIUM

is also your responsibility not to accept non-compliant documentation from suppliers abroad that would risk delays and even rejections of consignments with associated costs.

Regarding your recommendation for harmonised guidance to ensure legal certainty and proportionate implementation to preserve the integrity of the Single Market and ensure equal treatment of operators across the Union, I would like to recall that CATCH is the EU's harmonised IT system that provides basis for the equal treatment of operators across the European Union whereas the previous paper-based system enabled unequal conditions. To ensure the effectiveness of CATCH and a level playing field across the EU, it is crucial that all third countries comply with the same rules and that Member States competent authorities enforce the system towards their operators, as well as towards third countries, when data are incomplete or missing.

The European Commission has continuously provided harmonised guidance to Member States authorities, ahead of the mandatory use of CATCH as of 10 January 2026, and since then, on a regular basis. In September, together with EFCA, a training was provided to Member States on a harmonised approach for checks and verifications in a digital environment.

In addition, the European Commission has made publicly available regularly updated FAQs as well as training material (videos and manual) that will be overhauled early next year to take account of all major CATCH developments.

Concerning the recommendation to strengthen coordination between the European Commission, Member States and Single Liaison Offices (SLOs), the European Commission has regular exchanges with Member States authorities to promote harmonised implementation and to reply to technical questions; in that sense, several IUU Working Groups have been organised with Member States' competent authorities since the beginning of the year. There have also been specific exchanges on an ad hoc basis when temporary technical difficulties were confirmed.

As to the request for documented manual verification procedure in line with the provisions of Article 12c of the IUU regulation (**contingency arrangements**), the situation of unavailability of CATCH is covered by Article 6a(9) of Implementing Regulation (EU) 1010/2009, as last amended by Implementing Regulation (EU) 2025/1522. This Article lays down the procedure to be applied in that situation. In addition, in case CATCH would be unavailable, this information is transmitted by the European Commission to relevant authorities and not decided by EU authorities or operators on their initiative.

You also recommended that the Commission **prioritises the remediation of operational shortcomings** identified by operators and authorities, and **that operators should have access to clear, structured channels for reporting recurring operational issues**.

CATCH has been developed to meet the legal requirements of the IUU Regulation. Validation rules are for instance designed to harmonise the implementation of the catch certification scheme and ensure a level playing field. Gear classification of the revised catch certification scheme is based on international standards and enables products imported from any country to comply with annex III of Regulation (EU) N°1379/2013.

Beyond the legally required developments of CATCH, continuous system updates and improvements are based on feedback from Member States' authorities and operators.

Regarding the recommendation for progressive development of **full system-to-system interoperability, including under the EU Single Window Environment for Customs framework**, in line with Article 3 of Regulation (EU) 2022/2399, work towards interoperability between CATCH and CERTEX is ongoing; and in accordance with Article 12b of the IUU Regulation, by 10 January 2028, this work will be complete.

CATCH was integrated with EU CSW-CERTEX with all planned functionalities since 30 April. It is now up to Member States' customs administrations to carry out their national integration activities. Depending on the progress of integration activities by Member States' customs administrations, they can start automated real-time exchanges of information via EU CSW-CERTEX. It is therefore up to those administrations to work on this interconnection with their counterpart in DG TAXUD.

Concerning your recommendation on **cooperation with non-EU countries**, including major seafood exporting partners, in this first year of implementation of CATCH, priority has been given to interoperability with non-EU countries with already existing IT systems comparable to CATCH as well as to the promotion of direct use by non-EU countries without existing IT systems. Interoperability has already been established with 6 non-EU countries and interoperability dialogues are still ongoing with others, including major exporters to the EU. In addition, 13 non-EU countries have been granted access to CATCH for the purpose of direct use, many of them initially to target specific trade flows.

Member States and EU operators are also encouraged to promote the digitalisation of the flows with the authorities and exporters of non-EU countries.

You also recommend introducing **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.

I am pleased to confirm that this functionality already exists and is implemented by operators in CATCH who have the possibility to validate several users per entity, as well as the existence of a freight forwarder to act on behalf of the importer.

Regarding your recommendation for future major technical upgrades or developments to include structured, time bound **operational testing** involving representative operators (including SMEs), I can assure you that CATCH developments are systematically discussed with Member States and we invite operators to provide input to their national authorities. Operators can test the functionalities under development in the acceptance environment. Access credentials for operators have been shared with national authorities, to which they can be requested. Some developments support the effective implementation of CATCH while preserving the integrity of EU IUU controls and traceability objectives. New CATCH features available to operators are publicised on TRACES NT webpage.

I am looking forward to our continued fruitful cooperation. Should you have further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu.

Yours sincerely,

Charlina VITCHEVA

c.c.: Pedro Reis Santos secretary@marketac.eu