



Mandate

18 November 2025 Inter-AC Meeting

Brussels, 17 November 2025

1. Background

On 18 November 2025, DG MARE will be organising an Inter-Advisory Councils meeting. The morning session of the meeting will be dedicated to an exchange of views with Director-General Vitcheva on “General EU Fisheries matters” and an exchange of views on the “Strategy on EU fisheries external action”. The afternoon will be dedicated to a presentation by DG MARE on the Multi-Annual Financial Framework, a presentation by ACs on a joint advice on the functioning, a discussion on functioning (representativeness, membership, rules on conduct, financing), and sharing of experiences by LDAC and MEDAC on the performance reviews. The invitation includes guiding questions for the session on the Strategy on the EU fisheries external action.

The MAC will be represented by Yobana Bermúdez (MAC Chair), Christine Absil (MAC Vice-Chair), Julien Lamothe (MAC Vice-Chair and Chair of Working Group 1), Pierre Commère (Chair of Working Group 2), Benoît Thomassen (Chair of Working Group 3), and Pedro Reis Santos (Secretary General). Other members will be able to follow the meeting online as observers.

2. General EU Fisheries matters (exchange with Director-General Vitcheva)

a) Implementation of the Fisheries Control Regulation¹

¹ [MAC Advice on “Upcoming Delegated Act on Additional Rules for Traceability of Fresh and Frozen Fishery and Aquaculture Products and Marking of Lots”](#)

According to the revised Fisheries Control Regulation, full digital traceability requirements will apply to fresh and frozen fishery and aquaculture products from 10 January 2026. Our Working Group 2 had the opportunity to exchange with your services on the upcoming draft articles. The draft delegated act published in July included the two articles, but these were removed from the version adopted in August. Therefore, we would like to know about the expected next steps, including further technical exchanges, and the effects on the entry into force of the requirements.

While the MAC welcomes the strengthening of traceability across the supply chain, with due interoperability, several points would benefit from further clarity. These include the notion of “international standards that guarantee interoperability”, the determination of the entities responsible for lot identification, the data recording period, the definition of “aquaculture production unit”, and the references to the concept of “lot” and “unique identification number”. Furthermore, the Commission should share information on best practices and funding opportunities for SMEs.

b) Vision for Fisheries, Aquaculture and their Market in 2040

Under his mission letter, Commissioner Kadis is committed to the preparation of a vision for the fisheries sector with a 2040 perspective. In the view of the MAC, the communication should cover also aquaculture and the entire supply chain. The “Vision for Agriculture and Food” was published in February 2025 and positively mentions the fisheries and aquaculture sector, but lacks concrete policy actions. In the view of the MAC, food policy should always include fishery and aquaculture market supply chains. Therefore, more information is needed on the timing of the vision for fisheries and the coordination between the various Commission services.

In the view of the MAC, the “Vision” should cover the three pillars of sustainability, recognise the nutritional and environmental benefits of fishery and aquaculture products, recognise the strategic role of the value chain for food security, ensure sustainable and sufficient supply, ensure

a level-playing-field in the EU market and trade with fair conditions, recognise the contributions to the economy and culture of rural and coastal communities, tackle generational renewal, recognise the importance of public support and of the continuation of a dedicated sectoral fund, acknowledge the impact of recent crises on the supply chain and on consumption, promote stakeholder engagement, and connect clearly to horizontal EU policies.

c) Simplification targets

The MAC welcomes the ongoing efforts of the Commission to strengthen the competitiveness of the EU. On behalf of our Advisory Council, I thank your services for the opportunity to exchange on the initiatives of DG MARE to meet the simplification targets set by President von der Leyen. In the case of other sectors, there were specific Omnibus Regulations to reach the targets. In the case of DG MARE, the focus will be on the evaluation of the Common Fisheries Policy, including Common Market Organisation (CMO), and the implementation of the revised Fisheries Control Regulation. Therefore, more clarity on the timeline would be welcomed and the link to the evaluation of the Common Fisheries Policy & CMO.

d) Labelling and consumer information concerning plant-based imitations²

In 2021 and in 2023, the MAC provided you with advice on the labelling of plant-based imitations. In your letters of reply, you maintained that the existing legal framework, specifically the Food Information to Consumers, sufficiently regulates the matter. Since then, the European Parliament adopted a resolution calling on the Commission to investigate the matter and to revise the legislation of plant-based imitations. The PECH Committee published a study on “Labelling of

² [MAC Letter on “State-of-play on labelling and consumer information concerning plant-based imitations of fishery and aquaculture products” \(21 October 2025\)](#)



plant-based seafood substitutes”. In the context of the AGRIFISH Council, several Member States called for the protection of traditional names of animal origin food.

Recently, the Commission published a legislative proposal to amend the Common Market Organisation for agricultural products. The proposal introduces restrictions to the use of designations associated with meat. Some of the restrictions (e.g., “fillet”, “loin”) could have an impact on current national labelling practices of fishery and aquaculture products. Therefore, as indicated in a recent letter to you, the MAC would welcome information on whether your services are considering new initiatives on the labelling of plant-based imitations. We would also like to hear about your collaboration with other Commission services, such as DG AGRI and DG SANTE, to ensure a common approach to food labelling policy in the EU market.

3. Strategy on EU fisheries external action

For the MAC, the upcoming “Strategy on EU fisheries external action” is a key priority. Yesterday, we adopted advice on the topic. We take the opportunity to thank Director Fernando Andresen Guimarães for his availability to exchange with us on the upcoming communication.

- a) Do you share the view expressed by many stakeholders that compliance with flag, coastal, port and market States responsibilities is central to an international level playing field? Are there are other elements that you consider relevant in this regard? Do you agree that the main issues of concern are flags of convenience, IUU fishing, transshipment in the high sea and implementation of the FAO port state measures agreement (PSMA) and effective monitoring and control systems in RFMOs and coastal States? Which other issues would you consider to be of main concern? Would enhancing transparency obligations, projecting the EU control rules internationally and fostering new technologies be the right levers? Which other concrete actions, instruments or measures would be relevant in this regard.**



The EU should aim at promoting improved international ocean governance and sustainable value chains and take action that contributes to improve international fisheries management, create a level playing field, tackle IUU fishing, and meets international targets and objectives, including through effective implementation of EU import control rules cross Member States.

The IUU Regulation has allowed the EU to stop seafood products that have been fished in an IUU manner from entering the EU market. The EU should maintain a “zero-tolerance” approach to IUU fishing. The EU should actively engage and coordinate with international partners and RFMOs to promote the adoption of similar standards worldwide, including catch certification systems. The EU should leverage trade policies to incentivise compliance, including conditioning market access on adherence to anti-IUU measures. Enforcement should be predictable, proportionate, and supported by dialogue. The EU’s IUU “carding system” remains one of the most powerful and innovative tools in the global fight against IUU fishing. To maintain its credibility and leadership, the EU must ensure that the “carding” mechanism is applied rigorously, consistently, and without geopolitical bias.

To multiply the global impact of the EU’s “carding system” and prevent the displacement of IUU products to non-EU markets, the EU should promote international alignment of IUU enforcement mechanisms. The EU should particularly intensify cooperation with major seafood importers, such as the USA and Japan, to develop a common approach to market conditionality. The implementation of the IUU Regulation should be strengthened across all Member States to ensure that catch certificates and direct landings are properly verified, especially when originating from high-risk flag States or countries facing “yellow cards”.

The EU should also address the fundamental challenge of opaque ownership in relation to vessels supplying the EU market. While flags indicate where fishing vessels are registered, they reveal limited information about who ultimately owns or profits from fishing activities. Deliberately

opaque ownership structures enable operators to shift flags, rename vessels, and change jurisdictions to avoid scrutiny, sanctions and accountability, leaving enforcement efforts to target only front companies or crews while real beneficiaries remain beyond reach. Global vessel transparency is a core pillar of any effective strategy against IUU fishing, so the EU should lead a renewed global push for meaningful engagement with the FAO Global Record of Fishing Vessels.

The EU should pair its control efforts with capacity development in third countries, helping trading partners to meet evolving standards, including through the promotion of CATCH IT. Continuous diplomatic efforts and public communication will further position the EU as a global leader in sustainable fisheries governance.

b) Certain stakeholders argue that the EU should make greater use of its market influence and diplomatic engagement to promote sustainable fisheries worldwide. In your view, would a combination of strengthening requirements to comply with key international agreements and commitments on fisheries, calibrating trade arrangements against the fulfilment of these requirements and supporting capacity building in third countries be a way forward? How should we account for regional specificities? What alternatives would you propose?

A coordinated approach across the Commission (DG MARE, DG TRADE, DG AGRI, DG SANTE) and other EU institutions is essential to ensure that fishery and aquaculture products are treated as a strategic food commodity, including within EU diplomacy, in line with climate, food security, and development goals. A coherent external fisheries policy is key to ensuring geopolitical leverage and food sovereignty, including through ocean diplomacy that fosters cooperation and market access, balancing high standards and supply security.

At the bilateral level, trade instruments play an important role in ensuring stable and competitive access to raw materials. Trade agreements should include enforceable sustainability clauses, with

such provisions accompanied by clear guidance, well-defined compliance levels, and sufficient time for third-country operators to adjust. At the multilateral and bilateral levels, the EU should continue promoting responsible fisheries management through active engagement in RFMOs, while also advocating for improved labour conditions and human rights protections. At the multilateral level, the EU should advocate for reciprocity in standards. External action should strike a careful balance between advancing sustainability and supporting economic development in partner countries, particularly in coastal communities dependent on fisheries for livelihoods.

At a regional level, according to the estimates of FAO, sustainability rates vary, particularly depending on the management efforts in place, demonstrating the importance of strong management systems. In general, the EU fisheries and aquaculture supply chain, through stringent regulatory, safety and traceability requirements as well as voluntary initiatives and sourcing policies, focuses on sustainably sourced products.

Capacity development should be at the core of EU external engagement. For third countries with limited digital or technological capacity, EU support in the form of training, infrastructure investment, and technical cooperation is essential. Capacity development should focus on sustainability management, improvements of working conditions, implementation of effective monitoring and enforcement systems, compliance with human rights and social sustainability, trade standards, and development of markets.

Overall, the EU should uphold strong standards and regulations, while prioritising effective implementation, coordination, and enforcement of the existing rules, such as the IUU Regulation, the Forced Labour Regulation, the Corporate Sustainable Due Diligence Directive, and Regulation (EU) No 1026/2012.

c) Enhancing environmental and social sustainability is a largely shared goal. Do you agree that the priority is to ensure that the ecosystem approach, the consequences of climate

change and the implementation of the BBNJ agreement are effectively addressed in all areas where EU fisheries is active externally? How can the EU fleet embark on decarbonising while remaining competitive? Beyond advocating for implementing ILO labour standards and social rights and the EU regulation banning products stemming from forced labour, which other action could the EU carry out to upgrade working conditions of fishers globally?

The EU market has a high dependency on imports of fishery and aquaculture products and on shared fisheries stocks. At the same time, the world faces geopolitical tensions and increased competition as well as challenges related to marine spatial use and resources, and climate change. Therefore, the EU external fisheries strategy should contribute to increased coherence, proactivity, and effectiveness, while aligning with the objectives of the CFP, including long-term science-based fisheries management on the basis of independent scientific advice.

The Commission should contribute to strengthen the role of UNCLOS in international and regional bodies to support science-based ocean governance. The Commission should support and transpose global initiatives, such as the BBNJ Agreement and new COP decisions, and ensure that RFMOs are included in the decision-making process.

Eliminating forced labour across the fisheries and aquaculture is crucial. The recently adopted Forced Labour Regulation strengthens the EU's ability to prohibit products made with forced labour, including fishery and aquaculture products, from entering the internal market. Ensuring decent working conditions across the fisheries and aquaculture supply chain is also crucial. Therefore, the EU should lead global efforts to promote binding standards on social responsibility, including on forced labour and decent working conditions, across RFMOs and initiatives of the FAO. To be effective globally, and although labour practices, wages, and working hours vary significantly across regions globally, these efforts should be implemented in

collaboration with partner countries and RFMOs, taking into account regional contexts, while respecting and endorsing core labour rights and international standards.

The ILO Convention 188 and the PSMA set a universal baseline for decent working conditions and transparency in supply chains. In the case of third countries facing constraints in implementing these, the EU should provide technical and financial support for ratification, enforcement, and capacity development to help partner countries meet expectations.

The forthcoming criteria for the Corporate Sustainability Due Diligence should give substantial weight to forced labour risks in fishery and aquaculture supply chains, reinforcing coherence between trade, sustainability and human rights objectives. SMEs, including family-run businesses, should be supported in compliance. Furthermore, capacity development with third countries is key.

The Commission should ensure coordinated action among the relevant Directorates-General, particularly DG TRADE and DG EMPL, in addition to DG MARE, to effectively address trade, labour, and sustainability dimensions of fisheries and aquaculture supply chains. The Social Partners for Sea Fisheries should also be fully involved in all initiatives related to working and living conditions in the fishing sector. The EU's market power should be leveraged to raise the bar on social rights and working conditions where feasible.

d) Two factors stand out as identified roots of unfair competition: capacity-enhancing public subsidies and lack of transparency on ultimate beneficial ownership of fishing vessels or companies. How concretely do you think the EU can tackle these issues, including ways of triggering international cooperation?

The WTO Agreement on Fisheries Subsidies (Fish 1) is a positive step to level the playing field by promoting sustainable fisheries management globally. By addressing harmful subsidies that

contribute to overfishing and illegal fishing activities, the agreement supports efforts to ensure that seafood products placed on the markets are sourced responsibly and sustainably.

The implementation of the agreement should be carefully managed to avoid penalising legitimate support for sustainable fisheries. The EU should advocate for the recognition of subsidies that promote sustainability, innovation, or social cohesion. The agreement should also avoid unfair asymmetries between EU and non-EU operators. Implementation challenges are likely to occur, as enforcement and compliance may vary between countries. Monitoring and verifying subsidy practices in complex global supply chains can be difficult. Therefore, the EU and the WTO should provide technical assistance to low-income countries, while also promoting a fair and transparent approach. Clear guidance and practical tools should be available to operators, including importers, to minimise risks.

4. Multi-Annual Financial Framework (MFF)

In the view of the MAC³, a dedicated financial instrument for fisheries, aquaculture, and maritime affairs is essential. The current EMFAF and the preceding funds have played a decisive role in structuring and supporting the fisheries and aquaculture sector in the EU.

For the future of primary production and of the rest of the supply chain, funding should be strengthened and increased, to support and accelerate their transition to sustainability, while ensuring resilience, and guaranteeing the continued viability of the sector and the health of our oceans. The next funding period must address several topics of relevance for the supply chain, such as support for generational renewal, training, ensuring food security and safety in the EU through the provision of healthy and affordable aquatic foods, support for Producer Organisations, support for safe working conditions, modernisation of production and processing

³ [Multi-AC letter on the future of the Multiannual Financial Framework \(MFF\) \(15 April 2025\)](#)

facilities, and sustainability from sea to consumers. The reallocation of EU expenditure through national programmes per Member State would be detrimental and contrary to the necessary targeting of support.

As the ACs are considered bodies pursuing an aim of general EU interest, if the EU proceeds with a multiannual budget composed of national programmes, the MAC asks for clarity on how DG MARE would provide for the future operating grants of the ACs. The ACs play a key role in the implementation of the CFP and in stakeholder engagement. To ensure that the ACs can continue their mission, it is imperative that appropriate funding is allocated to them and to DG MARE.

5. Discussion on functioning (representativeness, membership, rules on conduct, financing)

The MAC is composed of 75 member organisations representing the entire fisheries and aquaculture value chain (primary producers, auctions, processors, traders, suppliers, retailers, trade unions) and other interest groups (environmental and development NGOs, consumer groups), from 12 Member States. Through the participation of the major federations in the EU, the geographical representativeness of the MAC is *de facto* EU-wide.

Across the various operational years, the membership has continuously increased, including through specific efforts by the Secretariat to promote membership applications, to increase representativeness, both in terms of interests and of geography. Most recently, the representativeness of the aquaculture sector was reinforced with the joining of several associations. The other interests group college was also reinforced with the joining of a new environmental NGO and of a consumers group.



As indicated on our letter of 4 March 2025⁴, clarity is needed on the classification of non-profit organisations with at least 50% of the funding originating from a certification scheme / label, to ensure legal compliance and consistency across the various ACs.

Our Statutes and Rules of Procedure are publicly available online. Guidelines on the participation of observers in meetings and guidelines for reimbursements and allowances are also available. The Executive Committee regularly discusses the functioning of the MAC and the drafting processes, in order to solve problems and improve the internal functioning.

The MAC did not subscribe to the joint advice to improve the functioning and management of the ACs. Overly prescriptive measures should be avoided, as it could lead to unnecessary administrative burden. The ACs have legal autonomy. Through statutes and rules of procedure, while respecting the applicable EU rules and national rules on association, it is possible to define and detail the roles and responsibilities of the Chairs, Secretariats, and other bodies. It is also possible to limits on the numbers of chairmanship mandates as well as rules on voting procedures. The ACs also have budgetary autonomy. Through the budget, the ACs can finance staff performance reviews as well as training and capacity-building programmes. The current mandatory periodical external performance review, which already creates significant administrative and financial burden, can facilitate the evaluation of the secretariat and of the membership as well as identify areas for improvement. Therefore, the approach of DG MARE should be to respect existing well-working practices in individual ACs and the corresponding autonomy of the Secretariats, while remaining available to assist when questions arise.

As for financing, the MAC is pleased with the change to a lump-sum approach. Since the implementation of the new approach, the annual financial support provided by DG MARE has remained stable with adjustments of 2% to reflect inflation rates. Nevertheless, we would

⁴ <https://marketac.eu/letter-from-the-market-advisory-council-on-the-classification-of-non-profit-organisations/>



welcome an opportunity to discuss broader increases in the financial support. Across our ten years of operation, despite the increasing number of members, which translates into more operational and meeting costs, and the increasing number of activities, including the mandatory external performance reviews, the amount of support has remained virtually the same.

As an additional point, the MAC would like to encourage the Commission to recall all ACs of the importance of respecting the areas of competence established in Annex III of the CFP Regulation. In recent years, several ACs broadened their exchanges and recommendations to topics related to the market of fishery and aquaculture products. These practices can contribute to duplication, impacting public and stakeholder resources, and to conflicting and non-representative advice. In an upcoming meeting, our Executive Committee will be holding a more comprehensive exchange on the matter, which might be followed by specific requests to DG MARE.