

Working Group 1: EU Production

Minutes

Wednesday, 17 September 2025 (09:30 – 13:00 WEST / 10:30 – 14:00 CEST)

NH Imperial Playa, C. Ferreras, N.º1, 35008 Las Palmas de Gran Canaria, Spain / Zoom

Interpretation in EN, ES, FR

Welcome from the Chair, Julien Lamothe

Presentation

Adoption of the agenda and of the last meeting's minutes (05.06.25): Adopted

Action points

- **State-of-play of the action points of the last meeting - information**
- Common Fisheries Policy:
 - Updated version of the draft advice “Evaluation of the Common Fisheries Policy (2014-2024)” to be considered via urgent written procedure
 - Advice adopted on 7 July 2025
- European Market Observatory for Fisheries and Aquaculture (EUMOFA):
 - Updated version of the draft “European Market Observatory for Fisheries and Aquaculture (EUMOFA): Suggestions of studies to be integrated in the Work Programme (2025)” to be considered via written procedure
 - Advice adopted on 1 September 2025

Landing Obligation

- **Presentation of the study supporting the evaluation of the landing obligation by Adolfo Merino Buisac (MARE D3)**

Presentation

The Chair recalled the previously adopted advice on the landing obligation, which focused on the market aspects of the landing obligation, such as market outlets from unwanted catches.

Adolfo Merino Buisac (DG MARE) explained that the European Commission commissioned an external study, published on 16 June 2025, to support the evaluation of the Landing Obligation under the ongoing evaluation



of the Common Fisheries Policy. The study was presented by the authors on 8 July 2025. The study, in line with the Better Regulation method, focused on the five evaluation criteria: effectiveness, efficiency, relevance, coherence, and EU added value. Two additional evaluation criteria were used: complementarity and sustainability. The study was based on desk research, surveys, and interviews with stakeholders. There were 10 case studies, which mainly focused on production.

Mr Merino Buisac provided an overview of the key research questions: 1) whether or not discarding of species has been gradually or is being eliminated, 2) whether unwanted catches have been reduced as far as possible, 3) if and why, in certain cases, the intervention has not worked, 4) the challenges experienced by Member States and industry with its implementation, 5) if the landing obligation lacks full compliance and implementation because it is difficult to control, including whether or not the new provisions on control under the revised Fisheries Control Regulation could facilitate this difficulty, 6) whether or not the intervention creates the right positive incentives sufficiently for fishers to continue discarding, and 7) whether the design of the landing obligation is applicable the same way in all the sea basins, accounting for regional specificities.

Mr Merino Buisac highlighted that there were multiple limitations, namely the large number of exemptions available to fishers, the lack of EU wide data sources available which included exemptions applied directly linked to the logbook reporting, scientific data collection strategies of the Member States not being at the scale of the landing obligation implementation, the natural annual variability, the level of control and enforcement at local and regional levels, the lack of quantitative or published qualitative information for some (sub)indicator, and the subjectivity of insights from stakeholder consultations. The Commission representative informed that, according to the study, the landing obligation has not achieved its full potential and was not implemented as originally designed. It has not contributed to the objective of gradually eliminating discards. There were issues related to compliance, including due to limited monitoring and enforcement, numerous exemptions, economic and technical difficulties, and a lack of support from the fishing industry. Therefore, there was a disconnect between policy design and practical implementation at sea.

Mr Merino Buisac informed that, according to the study, from a market perspective, there was a lack of motivation due to the extra workload. There were extra costs, but no market for the small fish. The potential market faced increased costs and logistical challenges. There was a lack of processing capacity and limited market outlets. The Landing Obligation did not contribute to other strategies, such as the Farm to Fork Strategy. Through targeted investments in value chains for previously discarded species, the Landing Obligation could have supported sustainable food systems. The Landing Obligation is coherent with the Waste Framework Directive and with the Sustainable Development Goal 12.3 on reducing food losses, but the disposal of unwanted catches to landfill is not.



Mr Merino Buisac further informed that that the study recommended strengthening monitoring and enforcement, enhancing gear selectivity, improving data collection and analysis, providing economic and operational support, and fostering collaboration and targeted interventions. From a market perspective, the study recommended a better alignment between the Landing Obligation and waste and food policies, including stronger investments in processing infrastructure and innovation in byproduct valorisation, more guidance for specific uses under “direct human consumption”, and dialogue across Commission services (DG MARE and DG ENV). The study also recommended supporting market development for unwanted catches, including new value chain (e.g., pet food, bio-based materials), and public procurement for non-human consumption.

Mr Merino Buisac mentioned that, according to initial stakeholder reactions at the 8 July 2025 event, stakeholders generally believed that the study aligned with their views. Some of them also believed that successful implementation would require stronger enforcement and sanctions, together with a more pragmatic and regional approach while others were missing the removal of this measure as main recommendation of this study. Several stakeholders emphasised the importance of market incentives and called for legislative amendments to reflect the economic realities of EU fisheries. To finalise, the Commission representative highlighted that the study would feed into the full evaluation of the Common Fisheries Policy Regulation, but it was not possible to prejudge the outcome of the full evaluation. He added that the study highlighted the need for continued dialogue and for collaboration between regulators, fishers, and scientists.

- **Exchange of views**

Pim Visser (NOVA) argued that the Landing Obligation was not workable, nor enforceable. Mr Visser emphasised, that, if discards are landed, the fish auctions face very significant costs, which clients are not willing to cover. According to the experience of the fish auctions, due to the lack of economic value, the only way of getting rid of these catches is as waste. He argued that the catches were not even viable as feed due to the lack of economic incentives. Therefore, considering the lack of “buy in” from the stakeholders, stricter enforcement would not make the Landing Obligation workable.

Christine Absil (Good Fish) recognised that the implementation of the Landing Obligation was difficult for some fisheries. Nevertheless, Ms Absil expressed surprise concerning the conclusions reached by the study. She recalled the various studies financed by the Horizon Europe programme and by national authorities. While it was not be easy to determine an economic model, in her view, there was significant information available on potential uses, processing, and alternative ways of dealing with unwanted catches.

Patrick Murphy (IS&WFPO) expressed disagreement that the issue was a lack of enforcement. To examine the implementation of the Landing Obligation, the focus should be not on the efforts of fishers and related data. In his view, the policy should focus on minimising discards, not on forcing landings of unwanted



catches. Mr Murphy that a “one size fits all” approach would not be workable for all fishers and fishing vessels. He added that the policy was not working.

The Chair encouraged the members to focus on the market-related aspects of the Landing Obligation.

Sergio López García (OPP7 Burela) responded that, in the implementation of the Landing Obligation, it was difficult to separate between production and market aspects. Mr López argued that the lack of compliance reflected the lack of a prior comprehensive socio-economic impact assessment, which was a bad starting point for the Landing Obligation. In his view, the market showed the reality and lack of feasibility of the policy. He added that the issue was also linked to the setting of fishing quotas.

John Lynch (Irish South & East Fish Producers Organisation) stated the results of the study were not surprising, since the Landing Obligation was not working. Mr Lynch emphasised that the industry aimed to maximise the market, but that there were inherent challenges with the compliance with the Landing Obligation in the context of mixed fisheries.

Juana María Parada Guinaldo (OR.PA.GU.) underscored that the legislation was impossible to implemented. In the case of the long-distance fleet, only the landing port was in the EU. When operating in third countries, operators had to face complex bureaucracy, which was difficult to explain. This translated into difficulties in relation to containers as well as with the authorities of third countries, namely on customs and sanitary matters. In her view, when the Landing Obligation was devised, these aspects were not properly addressed, which was creating difficulties for the long-distance fleet and for the entire value chain.

Daniel Voces (CEPESCA) argued that the Landing Obligation would not be workable. Mr Voces wanted to know whether DG MARE would consider amending Article 15 of the Common Fisheries Policy Regulation. Mr Voces recalled that, according to the impact assessment prior to the 2013 revision of the Common Fisheries Policy, a discard ban could lead to employment opportunities. Therefore, he wanted to know how many jobs had been created following the Landing Obligation. He also asked about the economic return as well as impacts on the quota distribution system.

Dominic Rihan (Killybegs Fishermen’s Organisation) exemplified that, in Norway, it took 10 years to implement a discard ban for one species. In comparison, the EU tried to implement a discard ban for all species in only four years. Mr Rihan argued that, even with increased control or market approaches, the policy would not be workable, as the policy was flawed. He argued that it was necessary to rethink the policy.

Adolfo Merino Buisac (DG MARE) responded that he took note of the comments made. Mr Merino Buisac explained that the study examined efficiency and flagged the administrative burden. In terms of job creation, the results were not very positive. The combination of burden, administrative efforts and controls did not achieve expected results. The Commission representative highlighted that, instead of additional studies, it was necessary to ensure a dynamic link between pilot projects and real implementation. He thanked the



members for their engagement and welcomed further advice or insights in the context of the ongoing evaluation of the Common Fisheries Policy.

The Chair commented that it would be difficult for the Working Group to go further on the topic, as several members called for comprehensive amendments, including to Article 15. The industry generally found it difficult to develop new market outlets for unwanted catches. Therefore, as a way forward, the Chair suggested to wait for the full evaluation of the Common Fisheries Policy.

Pim Visser (NOVA) argued that the Working Group should set, as an action point, to continuously monitor the related policy developments. Mr Visser underscored the importance of the evaluation of the Landing Obligation, expressing concern about selective interpretation of the study's findings.

The Chair welcomed the suggestion of Mr Visser. Therefore, the Working Group would continue to monitor the results of the evaluation of the Common Fisheries Policy, including of the Landing Obligation.

Common Market Organisation

- **Presentation on the section on Producer Organisations of the study on the Common Market Organisation by Séverine Renault (AND International)**

Presentation

The Chair explained that the agenda point followed up on the presentation delivered by Ms Renault at the 29 January 2025 meeting, focusing on the aspects related to Production Organisations under the study on the Common Market Organisation.

Séverine Renault (AND International) recalled that the 2013 reform of the Common Fisheries Policy and of the Common Market Organisation aimed to strengthen sustainability in EU fisheries and aquaculture, improve the market position of EU producers, and enhance transparency via marketing standards, consumer information and market intelligence. Since that reform, Producer Organisations have a pivotal role in implementing the Common Fisheries Policy through collective management. The objectives of the study were to contribute to the ongoing evaluation of the Common Fisheries Policy, identify best practices, provide concrete and applicable recommendations, and suggest possible improvements to the Common Market Organisation Regulation. The key questions addressed by the study included the representativity of Producer Organisations, Associations of Producer Organisations, and Inter-Branch Organisations, the effectiveness of the Common Market Organisation Regulation, the recognition rules established by Member States, and the governance and functioning of Producer Organisations.

Ms Renault explained that, on the overall representation, the study found that representativity increased since the reform of the Common Market Organisation. The representativity of Producer Organisations is highly variable depending on Member States and species. The share of Producer Organisations in the production is higher for fisheries (56%) than for aquaculture (37%), with particularly strong representation



in albacore tuna, plaice, herring and Norway lobster. The study found that small-scale fishers and SMEs are generally included in Producer Organisations. The share of the small-scale fleet that are members of Producer Organisations remains low in most countries due to financial constraints, geographical dispersion and socio-cultural factors, such as independence and distrust.

Ms Renault outlined that recognition rules differ significantly across Member States. Not all Member States have adopted national implementing acts to operationalise recognition conditions in the national contexts. National legislation or guidance documents identify quantitative thresholds for sufficient activity, minimum number of members, and concentration of voting rights. There was a lack of understanding by national authorities regarding checks of compliance with competition rules and the absence of any abuse of a dominant position. The lack of a clear procedure for withdrawal of recognition at the initiative of the Producer Organisations tended to result in unnecessary administrative burden.

Ms Renault highlighted that checks by Member States rely on analysis of documentary evidence, generally supported by standardised operational procedures. Only a few Member States consult the national register of companies to identify the owners of the legal members of Producer Organisations, as part of their recognition checks. Genuine plurality of members was generally not considered as an issue, due to the importance of natural persons among members. Non-compliance issues are generally addressed through recommendations by the national authorities leading to changes in statutes and internal rules. Withdrawal of recognition occurs mainly as a result of insufficient economic activity or a failure to deliver a Production and Marketing Plan.

Ms Renault provided an overview of the organisation and democratic functioning of Producer Organisations. In terms of legal forms, Producer Organisations can be non-profits, cooperatives, or companies. The representation on the board of different types of members is generally ensured through formal rules. Membership fees are generally lower for small-scale producers. In terms of governance, most Producer Organisations operate on the principle of “one member, one vote”. Voting rights can also be associated with vessels or be proportional to the activity (turnover). Concentration of voting rights is limited by internal rules or national frameworks. In terms of decision-making, decision by consensus is very common. Formal technical groups are used to discuss specific topics. Producer Organisations rely extensively on informal communication channels. As for sanctions, sanction systems include financial and administrative sanctions but are rarely used. Warnings and support to reach compliance are favoured when possible. Exclusion is rare, resulting from serious infringements of internal rules.

Ms Renault explained, concerning funding sources, that membership fees and other income generated by Producer Organisations represent the main source of income for a majority of respondents to the online survey. However, membership fees vary considerably depending on the size and financial capacity of members. Public funding remains essential for many Producer Organisations, in particular for Producer Organisations representing mainly or exclusively small-scale producers. She highlighted that there are very



significant differences among Member States in terms of the level of support granted to Producer Organisations, varying from less than 20.000€ per year to over 200.000€ per year.

Ms Renault highlighted the achievements of Producer Organisations. In terms of control and management of supply, Producer Organisations contribute to quota management to various degrees depending on Member States, planning, crisis management, etc. Producer Organisations contribute to market-related activities, including market knowledge, joint participation in commercial fairs, communication campaigns, etc. Producer Organisations contribute to product quality, transparency and sustainability via certifications, quality standards, and traceability. Producer Organisations also support compliance with the Common Fisheries Policy via training and capacity building, research projects, and digitisation. As main limitations, there is a limited bargaining power, since only a few Producer Organisations manage sales and are in a position to negotiate prices. Producer Organisations are also limited by access to financing, since there are delays, no pre-financing, uncertainty related to annual application cycles, among other factors. Additionally, there is the complexity of the regulatory framework and differences among Member States.

Ms Renault stated that Associations of Producer Organisations contribute to enhancing the negotiating and advocacy power of Producer Organisations. These are limited by the members' diverging interests. Furthermore, the measures under the European Maritime, Fisheries and Aquaculture Fund are primarily designed to support measures at national level, limiting the interest of establishing transnational Producer Organisations. Concerning Inter-Branch Organisations, she highlighted that these facilitate supply chain coordination. Nevertheless, these organisations are sometimes limited to accessing promotion funds rather than truly ensuring coordination across the supply chain.

- **Exchange of views**

The Chair requested information on the publication process of the study.

Sévérine Renault (AND International) responded that she was unaware of the exact publication date, but that the study should be publicly available very soon.

Javier Ojeda (FEAP) commented that the ecosystem of Producer Organisations in the EU took many years to develop and become effective. Mr Ojeda argued that the next Multiannual Financial Framework, in accordance with the proposal from the Commission, would effectively destroy Producer Organisations due to the impact on the financial support. He encouraged the Commission not to undermine one of the most useful tools under the Common Fisheries Policy. The proposal would impact Production and Marketing Plans and potentially even the Advisory Councils.

Guus Pastoor (Visfederatie), concerning the study's conclusions on the low bargaining power of Producer Organisations, asked for examples on where Producer Organisations had been successful. Ms Pastoor asked for more detail on why it was not working well.



Thibault Pivetta (EMPA) drew attention to the lack of Producer Organisations in the shellfish farming sector. Mr Pivetta highlighted the existence of other collective structures in some Member States prior to the establishment of Producer Organisations, wondering if these structures were mentioned in the study.

Séverine Renault (AND International), concerning bargaining power, provided the example of aquaculture Producer Organisations in Poland, which centralised the supply. Ms Renault explained that the study tried to compare Member States, but that it was hard to demonstrate the bargaining power of Producer Organisations, since there were limited tools to intervene in the market. On the shellfish sector, she acknowledged that the limited number of Producer Organisations was a known issue, particularly in the context of France. The study is based on the recognition foreseen in the Common Fisheries Policy.

Gerd Heinen (DG MARE) informed that the European Commission launched the publication procedure for the study through the Publications Office of the EU. Therefore, the study should be publicly available in the following weeks.

The Chair suggested that the Working Group should follow-up, once all the elements are known, including through an exchange of views with DG MARE on the findings of the study.

Gerd Heinen (DG MARE) clarified that the study by the external consultants would inform the conclusions of the European Commission in the context of the evaluation of the Common Fisheries Policy Regulation. This evaluation will include an assessment of the CMO provisions which will be available in the evaluation Staff Working Document to be published in 2026.

The Chair underscored the importance of the topic for the Working Group. As the evaluation of the Common Fisheries Policy would cover many elements, it was important to consider how to address the issue of Producer Organisations in the future. He drew attention to the link to the EU's financial programming.

Scientific, Technical and Economic Committee for Fisheries

- **Consideration of draft advice on STECF's Economic Report on the EU Aquaculture Sector**

The Chair recalled that, every two years, STECF publishes the economic report on the EU aquaculture sector. A questionnaire to collect feedback from the members was circulated from 3 to 17 July 2025. A proposal of draft advice, based on the views of the MAC and AAC members, was circulated ahead of the meeting. The Chair provided an overview of the draft document and the corresponding recommendations.

Pim Visser (NOVA), concerning draft recommendation b) on the “weight of sales” and “production”, drew attention to ongoing discussions in relation to the recently revised Fisheries Control Regulation. Water from ice would be included, representing up to 5% of the weight, which could cause distortions in statistical data. He suggested the addition of a footnote on the matter.



Mr Visser, concerning draft recommendation e) on the term “seafood”, highlighted the increasing use of the term “blue foods”, suggesting further discussion on whether to use such a term, in line with recent communication practices of the European Commission.

Mr Visser, concerning draft recommendation h) on the differentiation of the seaweed sector, expressed support for such a differentiation. He highlighted that the seaweed sector is growing, even though the actual production remains rather small.

Christine Absil (Good Fish) commented that the term “seafood” is subject of continuous discussion in multiple fora. In her view, it would be relevant to examine the most appropriate term to be used. Ms Absil recognised that even though “seafood” is meant to cover also freshwater products, a more inclusive term could be considered.

The Secretary General recalled that, based on previous exchanges in the MAC, such as on the advice on the 2022 report on the functioning of the Common Market Organisation, the aquaculture sector was not favourable to the use of the term “seafood”, as it did not adequately cover freshwater aquaculture. The term used in EU legislation is usually “fishery and aquaculture products”, which was the term also usually followed in the MAC’s documents. The Aquaculture Advisory Council usually used the term “aquatic food”, a term also used by the FAO. Nevertheless, in the previous exchanges, the fisheries sector expressed preference for a more explicit reference to “fishing” / “seafood”, as it is more commercially recognisable and accepted by the general public.

Javier Ojeda (FEAP) explained that the aquaculture sector was not against the term “seafood”, but that it did not accurately reflect freshwater aquaculture. “Seafood” is generally understood to mean “fish from the sea”. In his view, the term “fishery and aquaculture products” was long and bureaucratic, so, in practice, policymakers ended up referring to “fishery products”, creating uncertainty on whether the aquaculture sector was covered.

Mr Ojeda drew attention to the issue of the payment and collection of data for statistics via the European Maritime, Fisheries and Aquaculture Fund, which could be impacted by the legislative proposal on the next Multiannual Financial Framework.

Mr Ojeda, concerning draft recommendation h), suggested to redraft to “within aquaculture”, instead of “of aquaculture”.

The Chair, concerning the suggestion from Mr Visser to the Fisheries Control Regulation, wondered whether it would be relevant in the context of the aquaculture sector. The Chair recognised the importance of using clear terminology in public reports.

Patrick Murphy (IS&WFPO) mentioned that, in the context of mussels’ production, there was no particular questions being raised due to the provisions on weight under the Fisheries Control Regulation.



Pim Visser (NOVA) withdrew his suggestion.

Thibault Pivetta (EMPA) expressed support for Mr Ojeda’s intervention, while recognising that the selection of the appropriate term remained challenging. In his view, the primary purpose should be to use precise technical terms to correctly identify the categories of products covered. Mr Pivetta expressed support for draft recommendation h).

The Chair suggested to hold, in a future opportunity, a dedicated discussion on the appropriate terminology. The discussion could involve the Aquaculture Advisory Council.

Guus Pastoor (Visfederatie) commented that, in market contexts and in daily life, the mainly used term was “seafood”. In his view, the term “blue foods” was not widely understood.

Javier Ojeda (FEAP) recognised the relevance of holding a discussion on the terminology, including on the terms used in market contexts.

The Secretary General explained that the draft advice was previously considered by the Aquaculture Advisory Council. The Executive Committee of the Aquaculture Advisory Council expressed agreement with the document, introducing only a few minor amendments, including an explicit reference to “cocultures” in draft recommendation g).

María Luisa Álvarez Blanco (FEDEPESCA) recognised the importance of a reflection on the terminology used in market contexts. In her view, consumers were increasingly less connected to “fishery and aquaculture products”. The use of a different terminology, such as “blue foods” could help in connecting both the market and the end consumers. Ms Álvarez added that it was also necessary to reflect on how to communicate the origin of products, particularly EU origin. It was necessary to reflect on how to present and discuss fishery and aquaculture products in an effective manner.

The Secretary General informed that, prior to the meeting, PACT’ALIM submitted suggestions of amendments to the document. The amendments were mainly editorial. Under section 7 “publication”, PACT’ALIM suggested a reference to the 24 official languages of the EU.

The Working Group expressed agreement with the amended draft advice on “STECF’s Economic Report on the EU Aquaculture Sector (2025)”.

- **Way forward**

The Chair proposed, as a way forward, to put forward the agreed draft advice to the Executive Committee for consideration and potential approval.

Implementation Dialogue



- **Exchange of views on the competitiveness in the market of the small-scale fisheries**

The Chair recalled that the European Commission launched the Implementation Dialogues with the main aim to strengthen and boost European competitiveness by seeking feedback from stakeholders to facilitate the implementation of EU policies and the simplification of EU rules and spending programs. Earlier that year, Commissioner Kadis held an Implementation Dialogue on marine spatial planning.

The Secretary General informed that, on 24 November 2025, Commissioner Kadis would hold an Implementation Dialogue on small-scale fisheries. DG MARE asked the Secretariats of the Advisory Councils to designate four representatives to participate in the meeting. The Secretariats selected representatives from the Baltic Sea Advisory Council, the Outermost Regions Advisory Council, and from the Mediterranean Advisory Council. The MAC would be represented by the Chair, Yobana Bermúdez.

The Secretary General emphasised the importance of an exchange of views on the competitiveness in the market of the small-scale fisheries, which would help in the preparation of the mandate to be approved by the Executive Committee. He encouraged members to share their views on various issues in relation to the market and small-scale fisheries, such as administrative burden, simplification, commercialisation challenges, prices, Producer Organisations, consumer Information and awareness, integration in global value chains, and balance in the sourcing of the EU market.

Pim Visser (NOVA) highlighted that, across Europe, there is a widespread network of auctions at first point of sale, allowing transparency and valorisation of catches. Mr Visser argued that the emphasis should not necessarily be on small-scale production. The emphasis should be on a combination of freedom for direct contracts and of highest bidding in fish auctions. In his view, Producer Organisations of small-scale fishers have the possibility to place their products on the market. A good network of fish auctions along the EU coast would assist them achieve this, he added.

Nicolás Fernández (OPP72) argued that the various operators cannot be considered equal simply due to access to fish auctions. Mr Fernández underscored that small-scale fisheries operate at distinct speeds across the various coastal communities of the EU. Small-scale operators were facing a market problem, which was also linked to the impact of climate change on coastal fisheries. Small-scale fishers faced a disappearance and movement of several species together with the appearance of invasive species. As an example, fisheries in Gibraltar and in the Azores were facing invasive algae species. In his view, there were problems linked to supply and transformation of the market. A lack of technical and economic capacities for alternatives remained a challenge for small-scale fishers.

Mr Fernández further argued that artisanal coastal fisheries should not be determined merely on the sized of the fishing vessels. The technology used, sustainability considerations, and the role of family businesses, all critical factors impacting the market share, should be considered. He expressed concern that, in the future of the EU, small-scale fisheries would disappear due to not having the same opportunities and capacity as the large-scale fisheries. In his view, there was already a daily disappearance of the fishing sector. He added



that even Producer Organisations lacked capacity, since the presence of one fishing vessel above 12 meters in the organisation translated in the reduction of financial aid. The Commission and the Member States appeared to be against agreements between small and large-scale operators.

Mr Fernández explained that, from 2015 to 2025, the fishing fleet of Conil included 82 fishing vessels below 12 meters together with four fishing vessels between 12 and 14 meters, while facing a reduction of 35% in income. Referencing the intervention by Director-General Vitcheva at the 16 September 2025 meeting, he argued there was a lack of understanding of the realities of small-scale fisheries. Therefore, he expressed scepticism about the purpose of the Implementation Dialogue. The meeting could be used to mislead the Member States about the concerns of the European Commission.

María Luisa Álvarez Blanco (FEDEPESCA) underscored that fish auctions were the fairest mechanism for sales, allowing all operators to sell and purchase products at the same time, regardless of the size of their operations. Ms Álvarez argued that there were challenges in the access of resources, since less fishing translated into less products sold in fish auctions. Furthermore, large companies were able to, through supply contracts, purchase fish directly from fishing vessels, avoiding the auctions. For small fishmongers, it was becoming increasingly more difficult to access resources. The current policies favoured large multinational companies, replacing SMEs. She highlighted that the fishmongers sector lost one third of its operators, while continuing to decrease in size. In her view, the EU should clarify whether the intention is to continue to favour large companies.

Pim Visser (NOVA) emphasised that fish auctions were the best instrument to ensure fair prices. Mr Visser expressed agreement with Mr Fernández on the identified problems, including the impact of climate change and other challenges on small-scale fisheries. He provided the example of the decline of the Dutch fleet for brown shrimp.

Sergio López García (OPP7 Burela) emphasised that competitiveness was a structural problem of the sector, regardless of the fleet size. Mr López highlighted that production was declining, fleets were being dismantled, and fishers were leaving the sector. In his view, the existing EU policies were not helping the sector and were effectively pushing operators out of the market. He argued that further analysis on the competitiveness of the entire fleet as well as of the wider supply chain was needed.

Guus Pastoor (Visfederatie), concerning developments in the market, argued that there was an increasingly difficult segmentation, which made it more challenging to manage the market. Insufficient supply and low profitability meant that it was increasingly difficult to maintain infrastructure, including fish auctions. Therefore, it was necessary to consider which market segments should be prioritised, particularly as small processors were leaving the industry. Mr Pastoor highlighted the need for local and regional approaches to reach consumers, particularly in the context of the unprocessed fresh fish segment. On the other hand, an increasingly number of products were being processed, requiring a redefinition of the value chain. Therefore,



consumption patterns needed to be understood and marketing strategies, including for aquaculture products, needed to be optimised together with simplification of the rules.

Patrick Murphy (IS&WFPO) underscored that the sector faced many complexities. The establishment of Marine Protected Areas translated into exclusion zones for fishers. Therefore, there was an increase in the expenses, impacting supply. Mr Murphy expressed concern about the high administrative burden faced by fishers. In his view, the Commission should evaluate the impact of all legislation through a holistic view.

Mariano García García (FACOPE) highlighted the diversity of fish auctions across the EU. The fish auction of Andalusia handled, every year, 22 million € of fresh daily catch products, allowing the product to reach the market and restaurants. Both large and small producers participated. Nevertheless, distribution of fish auctions across the country was uneven. Mr García expressed concern about large companies purchasing the annual fishing activity, which affected fish prices and the usual price model.

Juan Manuel Trujillo Castillo (ETF) expressed concern about social dumping caused by imported products. Mr Trujillo underscored the importance of a level-playing-field in the market to ensure the same conditions for all products placed on the market. In his view, funding from the European Maritime, Fisheries and Aquaculture Fund was essential to achieve such a level-playing-field. Article 13 of the Common Fisheries Policy Regulation should be taken into account for a full operationalisation of the fishing quotas. Article 17 should also be considered for transparency in small-scale operations. He argued that the presence of too many fish auctions in the same geographical area could reduce the prices. Therefore, the points of sale should be rationalised.

Jérémie Souben (FEDOPA) emphasised the vital role of auctions in bringing together supply and demand. Fish auctions provided flexibility for small-scale fishers. These fishers had the option to sell part of their production through the auctions while selling another part directly. Nevertheless, the described model remained fragile, particularly in the context of rising costs. Mr Souben mentioned the difference in the presence of fish auctions along the French coast. Furthermore, there were significant differences across the regions of the EU. In the Atlantic coast, there was some level of consistency in access to fish auctions, while, in some areas of the Mediterranean, auctions were missing. The described disparity posed an additional challenge for small-scale fishers.

Daniel Voces (CEPESCA) underscored the challenges in implementing changes for the fisheries sector, since the European Commission continuously referred to potential new initiatives under the upcoming “Vision for Fisheries in 2040” and the evaluation of the Common Fisheries Policy. At the same time, the already published “Vision for Agriculture and Food” lacked concrete actions for fishers. While the Commission put forward many proposals to assist the agricultural sector, there was no action for fishers. The 25% and 30% simplification targets set by President von der Leyen should be kept in mind. In his view, the entire supply chain should be considered in these efforts, including in the context of the Implementation Dialogues. Mr



Voces encouraged the Commission to, in their efforts to reduce bureaucracy, meet with local operators and to organise visits on the ground to ensure a better understanding of daily problems.

Nicolás Fernández (OPP72) argued that the European Commission should face the different segments of the fishing fleets, while not creating division. The small-scale coastal fisheries were also not homogenous. In his opinion, the Commission was using the small-scale sector to “whitewash” their policies. Mr Fernández drew attention to the challenges in maintaining fish auctions infrastructure. His Producer Organisation handled 500 tonnes of fishery products yearly, representing 4 million €, but faced a reduction, in the first seven months of 2025, of 26% in production volumes in comparison with the previous year. In close proximity, there were three fish auctions with an increasing number of supply contracts that did not account for the origin of the products. He expressed agreement with Mr Souben on the diversity of networks across EU regions, which also translated in difference in the competition. Furthermore, the presence of illegal fishing in the Mediterranean Sea needed to be considered.

María Luisa Álvarez Blanco (FEDEPESCA) argued that competitiveness could not be measured uniformly across all operators of the supply chain. Ms Álvarez called for adaptation of the policies for microenterprises (companies with fewer than 10 employees). Microenterprises should not face the same level of bureaucracy as larger companies. In her view, there was a lack of a legal framework for very small operators. She added that her organisation conducted a study on the impacts of bureaucracy for companies with two employees. According to the study, these companies faced 1.000€ a month in additional costs.

Adrien Simonnet (UMF) acknowledged the relevance of focusing on various segments. Mr Simonnet argued that the market faced shortages and a decrease in competitiveness. The role of imports needed to be considered together with internal production tools, in order to address cooperation when there is lack of production. Cooperation between the various stakeholders of the value chain could be challenging. The role of each stakeholder should be defined. The overall organisation of the market should be considered.

The Chair emphasised the privileged opportunity provided by the Implementation Dialogues to exchange with Commissioner Kadis, expressing satisfaction that the Advisory Councils were invited to participate, which also had to account for a balance in the representation. The Chair acknowledged that competitiveness affects all stakeholders, so there were some doubts about the approach of the Commission to segment the sector in the upcoming meeting.

The Chair mentioned that, in his Producer Organisation, there was also a combination of vessels below and above 12 meters, as described by Mr Fernández. There were several transversal issues faced by fishing operators, such as decarbonisation, environmental impacts on resources, fleet reduction, and lack of competitiveness. The Chair expressed doubts about the relevance of continuously separating the fishing sector, including through the potential establishment of an Advisory Council for small-scale fisheries. He recognised the relevance of addressing segmentation of products, namely of fresh and processed products, due to operational differences.



The Chair also acknowledged the relevance of the issue of imports and sustainability criteria in the context of a globalised market. The administrative burden and the 25% simplification targets also needed to be considered.

Pim Visser (NOVA) highlighted that the definition of “small-scale fleet” mentioned by Director-General at the 16 September 2025 meeting excluded a significant part of the fleet, including trawler vessels. Mr Visser argued that, in the context of the Implementation Dialogue, the Commission should come up with the correct definition, so that the discussion does not go in the wrong direction. In his view, the Commission’s efforts to phase out bottom trawling in favour of passive fishing gear were skewing policy discussions.

The Chair drew attention to the ongoing efforts of the South Western Waters Advisory Council to develop a definition of “small-scale fleet”, adding that it could be relevant to hear from this Advisory Council on the matter.

- **Way forward**

The Secretary General informed that there would 30 participants, including the four representatives from the Advisory Councils, at the Implementation Dialogue, which meant that the intervention time would be limited. The Secretary General outlined the various key points raised by the members during the exchange, namely:

- Recognition of the importance of fish auctions to ensure transparency in the market as well as access by all operators, including small fishmongers, to fishery products – while recognising the fragility in maintaining infrastructure and the existing differences across EU regions;
- Recognition of challenges faced by small operators linked to climate change, species changes, and invasive species, which impact the supply available on the market, together with a lack of technical and financial support, and restrictions due to marine spatial planning;
- Recognition of the importance of Producer Organisations and overall market organisation;
- Importance of exploring new market segments and opportunities, including via local consumption of fresh products and via processing to develop products for other market segments;
- Simplification of rules, especially for small operators and microenterprises, including through missions by the relevant Commission representatives and consultants to meet local stakeholders and better understand local realities;
- Implementation of the same or equivalent standards to all products placed on the EU market, including imported products, to promote a level-playing-field;
- Maintaining the fight against IUU fishing and against illegal recreational fishing;
- Need to consider the wider policy context, particularly of other food policies, such as the simplification proposals for the agricultural sector;
- Importance of maintaining sectoral support.



The Secretary General informed that, together with the Chair of the Working Group, he would prepare the draft mandate for the Implementation Dialogue. Afterward, a written procedure would be launched for the Executive Committee to formally consider the document.

Sustainability Criteria for Fishery and Aquaculture Products

- **Update on the development of the sustainability criteria tool by Gerd Heinen (MARE A4)**

Gerd Heinen (DG MARE) explained that only few developments took place since the update provided at the previous meeting. Following the internal and external test phase of the tool, the Commission services were considering the feedback received, including that provided by the MAC and its members. The Commission was looking into structural issues, including the aims and scope of the initiative, and at technical issues, such as the criteria on stock status and the criteria on impact on the seabed. Further discussions, including with Commissioner Kadis, would still be needed, meaning that the initiative required additional time. Mr Heinen expressed availability to exchange at a future meeting, once there were tangible results on the outcome of the internal discussions.

- **Exchange of views**

The Chair emphasised the importance of receiving regular updates on the development of the sustainability criteria, to monitor its progress and understand its direction. The Chair suggested holding a new exchange at the next meeting of the Working Group.



Summary of action items

- Landing Obligation:
 - In the context of the ongoing evaluation of the Common Fisheries Policy, Working Group to continue monitoring developments on the landing obligation.

- Common Market Organisation:
 - In the context of the ongoing evaluation of the Common Fisheries Policy, Working Group to continue monitoring developments on Producer Organisations.

- Scientific, Technical and Economic Committee for Fisheries:
 - Draft advice on “STECF’s Economic Report on the EU Aquaculture Sector (2025)” to be put forward to the Executive Committee for consideration and potential approval.

- Implementation Dialogue:
 - Draft mandate, based on the feedback provided by the Working Group, to be prepared by the Secretary General and the Chair of the Working Group to be considered by the Executive Committee via a written procedure.

- Sustainability Criteria for Fishery and Aquaculture Products:
 - Update by DG MARE on the development of the sustainability criteria tool to be requested at a future meeting.



Attendance List

| Representative | Organisation | Role |
|--------------------------|---|-------------|
| Adolfo Merino Buisac | European Commission | Expert |
| Adrien Simonnet | Union du Mareyage Français (UMF) | Member |
| Angeles Longa | European Molluscs' Producers Association (EMPA) | Member |
| Alen Lovrinov | Producer Organisation Omega 3 | Member |
| Alessandro Manghisi | Aquaculture Stewardship Council (ASC) | Member |
| Alonso Abreu Lozano | OPP80 Punta del Moral | Member |
| Ângela Pécurto | ALIF | Member |
| Anna Rokicka | Polish Association of Fish Processors (PSPR) | Member |
| Anne-France Mattlet | Europêche | Member |
| Aodh O'Donnell | Irish Fish Producers Organisation | Member |
| Arthur Yon | FROM Nord | Member |
| Aurelio Bilbao Barandica | OPESCA | Member |
| Benoît Thomassen | Federation of European Aquaculture Producers (FEAP) | Member |
| Bertrand Charron | Aquaculture Stewardship Council (ASC) | Member |
| Camille Maisonneuve | Market Advisory Council (MAC) | Secretariat |
| Caroline Gamblin | PACT'ALIM | Member |
| Christine Absil | Good Fish Foundation | Member |
| Daniel Voces | CEPESCA | Member |
| Dominic Rihan | Killybegs Fishermen's Organisation (KFO) | Member |
| Elena Ghezzi | COPA-COGECA | Member |
| Fabian Schäfer | Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V. | Member |
| Fabijan-Hrvatin Peronja | OP Friska Riba | Member |
| Felicidad Fernández | ANFACO-CECOPECA | Member |
| Gaëtane Le Breuil | European Fishmeal | Member |
| Gerd Heinen | European Commission | Expert |
| Giuseppe Scordella | COPA-COGECA | Member |



| Representative | Organisation | Role |
|-------------------------------|---|----------|
| Grace Howe | The Nature Conservancy | Member |
| Guus Pastoor | Visfederatie | Member |
| Iñigo Azqueta Ruiz-Gallardón | ANFACO-CECOPECA | Member |
| Ioritz Bilbao Herrero | OPESCAYA | Member |
| Isabel Alonzo Cabezas | Spain | Observer |
| Janne Posti | Conxemar | Member |
| Javier Ojeda | Federation of European Aquaculture Producers (FEAP) | Member |
| Jean-Marie Robert | Les Pêcheurs de Bretagne | Member |
| Jennifer Reeves | Marine Stewardship Council (MSC) | Member |
| Jens Høj Mathiesen | Danish Seafood Association | Member |
| Jérémie Souben | FEDOPA | Member |
| Joanna Żurawska-Łagoda | Poland | Observer |
| João Pereira | FRUCOM | Member |
| Joaquin Garrido | European Molluscs' Producers Association (EMPA) | Member |
| Joe Emmanuel Seck | France | Observer |
| John Lynch | Irish South and East Fish Producers Organisation (ISEFPO) | Member |
| José Carlos Escalera Aguilar | FCOPECA | Member |
| Josefa Ruiz Saez | CARBOPECA | Member |
| Juan Manuel Trujillo Castillo | ETF | Member |
| Juana Parada | OR.PA.GU. | Member |
| Jules Danto | European Association of Fish Producers Organisations (EAPO) | Member |
| Julian Lamothe | European Association of Fish Producers Organisations (EAPO) / ANOP | Chair |
| Juliette Marguerite | European Salmon Smokers Association (ESSA) | Member |
| Justyna Radzewicz | Poland | Observer |
| Katarina Sipic | EU Fish Processors and Traders Association (AIPCE) / European Federation of National Organizations of Importers and Exporters of Fish (CEP) | Member |



| Representative | Organisation | Role |
|----------------------------|--|-------------|
| Laure Guillevic | WWF | Member |
| Linda Zanki Duvnjak | OP Friska Riba | Member |
| María Luisa Álvarez Blanco | FEDEPESCA | Member |
| Mariano García García | FACOPE | Member |
| Marine Cusa | Oceana | Member |
| Mikel Ortiz | OPPAO | Member |
| Patrick Murphy | Irish South & West Fish Producers Organisation | Member |
| Paulien Prent | Visfederatie | Member |
| Pedro Hernandez Saez | CARBOPESCA | Member |
| Pedro Luis Casado López | OPP80 | Member |
| Pedro Reis Santos | Market Advisory Council (MAC) | Secretariat |
| Pierre Commère | PACT'ALIM / Eurothon | Member |
| Pim Visser | NOVA | Member |
| Poul Jensen | Danish Seafood Association | Member |
| Rafael Piñero | EuroCommerce | Member |
| Sarah Hautier | EuroCommerce | Member |
| Séverine Renault | AND International | Expert |
| Sergio López García | OPP7 Burela | Member |
| Szilvia Mihalfy | FEAP | Member |
| Thibault Pivetta | European Molluscs' Producers Association (EMPA) | Member |
| Vanya Vulperhorst | Oceana | Member |
| Yoannis Pelekanakis | Hellenic Aquaculture Producers Organisation (HAPO) | Member |
| Yobana Bermúdez | EU Fish Processors and Traders Association (AIPCE) | Member |

