

Working Group 2: EU Market

Minutes

Thursday, 18 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, Pierre Commère

[Presentation](#)

Adoption of the agenda and of the last meeting's minutes (06.06.25): Adopted

Action points

- State-of-play of the action points of the last meeting – information

- Food and Agriculture Organisation:

- Secretariat to circulate a questionnaire to gather input on the upcoming session of the FAO's sub-committee on Fish Trade (8-12 September) with the aim of developing advice to the European Commission on the EU's mandate
 - Advice adopted on 20 August 2025
 - Letter of reply from DG MARE on 5 September 2025

Trade Agreements & Trade Policy Instruments

- Update on latest trade developments by Commission representatives (MARE B3), including:

- Indonesia (political agreement on Comprehensive Economic Partnership Agreement)

Pawel Szatkowski (DG MARE) informed that, at a meeting in July, President von der Leyen and the President of Indonesia expressed willingness to reach a political agreement on the Comprehensive Economic Partnership Agreement by the end of September 2025. Both sides had been working intensively through technical meetings to reach agreement. The previous week, at a technical meeting, agreement was reached on many outstanding points. A meeting in Indonesia was scheduled for the following week to celebrate the final political agreement. As the text of the agreement remained under embargo, it would not be possible to share the details. Mr Szatkowski confirmed that there was agreement on a chapter on sustainable development. Agreement was also reached on the rules of origin, which was based on the EU's proposal. As



for market access, a cautious approach was taken for sensitive products, including for tuna products. Modest tariff-rate quotas were set for tuna products. A communication from the Commission would be published on 23 September 2025, which would be made available on the website of DG TRADE.

- **Thailand (negotiation of Free Trade Agreement)**

Pawel Szatkowski (DG MARE) informed that the last round of the negotiations between the EU and Thailand took place at the end of June 2025. Discussions focused on the rules of origin and the chapter on trade and sustainable development. Provisional agreement was reached on the mentioned chapter. On market access offers, this was the second round of negotiations. The EU's side called for the exclusion of sensitive products, but the matter would have to be discussed again. Mr Szatkowski informed that the next round of negotiation would take place at the end of September in Brussels. The meeting would cover many outstanding issues, particularly on market access and rules of origin. He emphasised that the Commission services were favouring substance over pace. No deadline was set for the political conclusion. In his view, agreement could realistically be reached by the first half of 2026.

Julien Daudu (EJF) wanted to know whether the provisional agreement on the trade and sustainable development chapter was based on the EU's proposal. Mr Daudu drew attention to the ongoing legislative developments on fisheries control in Thailand. He called for a connection between the fight against IUU fishing, the legislative developments in Thailand, and the negotiation of the Free Trade Agreement, in order to protect Thai workers and the sustainability of marine resources.

Pawel Szatkowski (DG MARE) expressed satisfaction with the provisional agreement reached on the trade and sustainable development chapter. Thailand agreed on many of the points raised by the EU, including on the fight against IUU fishing. Mr Szatkowski emphasised that the Commission was closely following the legislative developments in Thailand.

Felicidad Fernández (ANFACO-CYTMA), on the issue of rules of origin, wanted to know whether exceptions were expected for tuna products from Thailand. Ms Fernández underscored the sensitivity of tuna products in the negotiations.

Pawel Szatkowski (DG MARE) responded that product-specific rules for products under Chapter 16 of the Combined Nomenclature were being discussed. Mr Szatkowski emphasised that the Commission was aware of the sensitivity for processed tuna products. While there was generally agreement on the conditions for fishing vessels, issues remained in relation to product-specific rules. Thailand was seeking more flexible rules, an approach that the EU does not want to follow. The matter would still need to be addressed further.

The Chair asked if the question of cumulation of origin within other ASEAN countries was an issue that had been discussed.

Pawel Szatkowski (DG MARE) responded that such a possibility was not on the table.

- **USA (new trade agreement)**

Kinga Malinowska-Facci (DG MARE) explained that new developments took place during the summer. In July, there was a political agreement, followed in August by a joint statement by the European Commission and



the USA. The Commission presented for approval to the European Parliament and to the Council draft regulations to implement the agreed tariff measures on the EU side.

Ms Malinowska-Facci highlighted that, for fishery products, there were three main elements. First, regarding the export conditions for EU products, the deal preserves a status quo for products facing a Most Favoured Nation (MFN) tariff of more than 15%. There will be no additional tariff applying to them. For other products, the ceiling of 15% will apply (including pre-existing MFN rate). The Commission emphasised that the described approach provided greater clarity and stability for EU exporters, which was the main aim of the agreement. Overall, the EU gained a stronger competitive position in comparison with other USA partners.

Second, on the import side, import quotas for USA products would be established. These covered mostly products already covered by the Autonomous Tariff Quotas regime. Therefore, it would be beneficial to the EU processing industry. The import quota offered to the US for Alaska Pollock correspond to the amount under the Autonomous Tariff Quotas. The other quotas are the following: 20 000 tonnes of for salmon, including processed salmon other than smoked; 5 000 tonnes for shrimp, 5 000 tonnes for squid, and 20 000 tonnes for hake and dogfish.

Third, the 2020 agreement on lobster setting of the EU's Most Favoured Nation tariff at 0% is extended, now including also processed lobster. This extension will maintain equal conditions for imports from the USA and Canada (previously in a privileged position due to CETA bilateral agreement).

Finally, Ms Malinowska-Facci used the opportunity to draw the attention to the fact that the Marine Mammal Protection Act of 2016 would be entering into application in January 2026. It will imply an USA import ban on products from fisheries that were not recognised as applying comparable standards of marine mammal protection to those in place in the US. Ms Malinowska-Facci informed that, by the end of August 2025, all the Member States that applied for such a recognition received a confirmation of comparability, with the exception was salmon and spiky crab from Ireland. This means that most direct exports from the EU Member States to the US will not be affected by the MMPA legislation. The Commission would be working on the pending matter of Irish exports with the aim of solving it as soon as possible. She recalled however that the legislation applies also to indirect trade. If EU exporters want to maintain exports to the USA, they should avoid sourcing raw materials from countries and their specific fisheries that have not received a positive comparability assessment. The list is publicly available at the US NOAA website.

- **Exchange of views**

Jérémie Souben (FEDOPA) expressed concern from the French Producer Organisations regarding the import quotas for dogfish (*Squalus acanthias*) under the agreement. The fishery had previously closed and then reopened in 2023. The marketing of the species remained complicated. Prices remained low at the first sale. Mr Souben expressed concern about the impact that the import quotas would have on EU producers. He also expressed concerns about the impacts on the level-playing-field and the maintenance of EU standards.

Daniel Voces (CEPESCA) expressed appreciation for the EU's efforts. In his view, as previously mentioned by President Von der Leyen, fair competition should be the guidance principle, including through reciprocity on trade liberalisation. Mr Voces expressed concern about the continued use of the seafood market as a bargaining tool in trade negotiations. Concessions should be balanced with benefits. According to 2023 data



from EUMOFA, there were significant exports of octopus, salmon, and scallops from the EU to the USA. Therefore, a ceiling of 15% was not entirely positive news. He requested information on a potential second phase of negotiations to set tariff derogations for the EU.

Concerning the import quotas for Alaska Pollock, Mr Voces recalled that the 340 000 tonnes foreseen in the Autonomous Tariff Quotas Regulation applied in an *erga omnes* manner. Therefore, he wanted to know whether the USA would benefit from a new import quota on top of the already regulated autonomous tariff quotas. Mr Voces also asked for information on the origin conditions for processed products, particularly whether these products could have a different origin but be processed in the USA.

Guus Pastoor (Visfederatie) recognised that the negotiations with the USA were challenging, highlighting the difficulties posed by the tariff duties to the EU industry. Mr Pastoor asked for more information on the tariff rates that would be competitive, particularly in comparison with the UK and Norway. He welcomed the foreseen access to species unavailable in the EU, such as salmon and Alaska Pollock. The relationship with the Autonomous Tariff Quotas remained unclear, particularly since the mentioned legislation imposed processing conditions on the EU industry. He agreed with Mr Voces that it was necessary to consider the level-playing-field, but it was also necessary to consider the quantities available on the market.

The Chair requested information on the procedural aspects of the agreement, including on the duration, the formal entry into force, and the provisional application.

Kinga Malinowska-Facci (DG MARE) clarified that the agreement reached was not a conventional “free trade agreement”. The EU and the USA reached a political agreement and agreed on a joint statement, but there would be separate implementation by both parties through domestic legislations. Instead of an international agreement, the Commission would be using the EU’s legislative instruments to incorporate the agreed measures into EU law. No time limit was foreseen. In case of lack of compliance by the USA, the EU could unilaterally change the legislation.

Concerning reciprocity and export interests, Ms Malinowska-Facci emphasised that DG MARE was aware of the interests of the EU industry and that these were communicated to the negotiators from DG TRADE. The ideal scenario would have been a “zero-for-zero” approach. At the present stage of negotiations, it had not been possible to obtain concessions for EU fisheries’ exports. On the import side, the USA was aiming at full liberalisation of EU import tariff on fishery products; the quota-limited solution represents therefore the best possible compromise. The Commission representative underscored that the offensive trade interests of the EU fisheries sector are well-noted for any potential future discussions.

Concerning Alaska Pollock and the Autonomous Tariff Quotas regime, Ms Malinowska-Facci recalled that only the USA and Russia had Alaska Pollock fisheries. The USA would be the only country with the possibility of using the quotas (ATQ and bilateral ones) for the specie. Therefore, in practice no additional market access was created. The Commission representative emphasised that the standard rules of origin still applied, so the products must originate in the USA.

Concerning the competitive position of EU products in the USA market, Ms Malinowska-Facci highlighted that several players faced higher tariffs. Norway would benefit from similar conditions as the EU with a 15% tariff rate. The UK would benefit from a 10% tariff rate, but overall, the EU had an acceptable margin to compete with other exports.



Jérémie Souben (FEDOPA) drew attention to the issue of dogfish (“aiguillat”) and the role of Producer Organisations in improving market conditions. Mr Souben warned that, together with the fishery in the Northwest Atlantic, there was a risk of overflowing the EU market. 20 to 30% of the production was already facing difficulties in finding buyers. He expressed concerns about the competition with imported products, particularly in terms of social, economic, and sanitary conditions. In his view, the competitiveness of EU fishers could be negatively impacted.

Kinga Malinowska-Facci (DG MARE) took note of Mr Souben’s concerns and clarified that the import quota was a joint one for hake and dogfish. This means that the quota could be entirely filled with imports of hake, given the interest expressed by the EU industry as regards supply of that species, leaving no space for dogfish imports.

- **Mercosur (approval of the interim Trade Agreement) and Mexico (interim Trade Agreement)**

Kinga Malinowska-Facci (DG MARE) informed that the agreements were presented to the European Parliament and to the Council for ratification. Trade agreements, which fall fully under the EU competence, are being considered separately from the larger political agreements (meaning a streamlined validation process, without submission to Member States national ratification procedures). The timeframe would depend on the calendar of the Parliament and of the Council.

The Chair suggested to hold a more comprehensive exchange on the two agreements at the next meeting.

- **Update on India (imports of shrimps and prawns) by DG SANTE representative**

Rui Ludovino (DG SANTE) informed that, over the past three years, the number of notifications related to shrimps and prawns from India under the Rapid Alert System remained fairly stable, including four notifications related to the presence of nitrofurans in aquaculture shrimp. In 2024, there were five notifications. Following these notifications, intensified controls were implemented. Mr Ludovino highlighted that a total of 20 establishments in India were placed under intensified official controls to check the residues of veterinary medicines in crustaceans and aquaculture shrimp.

Guus Pastoor (Visfederatie) expressed concern that India was not officially included in the list of authorised countries for aquaculture imports into the EU. Mr Pastoor requested information on the inclusion request from India and the guarantees provided, highlighting that there were already discussions ongoing between the Indian authorities and exporters to ensure compliance.

Rui Ludovino (DG SANTE) responded that India was included in the list and that imports were taking place. Every year, India was required to submit a residue monitoring plan as part of compliance monitoring.

Guus Pastoor (Visfederatie) clarified that he was referring to new legislation entering into force in 2026, which would raise further compliance requirements.

Rui Ludovino (DG SANTE) responded that the Indian authorities submitted a file, which was under evaluation by the European Commission. Several exchanges were ongoing with the Indian authorities. Further information was provided by the Indian authorities in August 2025.



The Chair emphasised the importance of stability in these approvals to avoid disruptions in the market of shrimps and prawns in the introduction of the new legislation.

Tony Nalovic (TOTM) highlighted that India, together with Madagascar and Bangladesh, was among the largest exporters of shrimps and prawns to the EU. Mr Nalovic expressed concern about the lack of use of Turtle Excluder Devices by the Indian fleet. He underscored that exporting countries should comply with EU legislation to place their products on the EU market.

The Chair clarified that the issue raised by Mr Nalovic did not relate to phytosanitary controls. The Chair recalled that the Outermost Regions Advisory Council was considering advice on Turtle Excluder Devices and activities in the waters of the Outermost Regions. The Secretariat of the Outermost Regions Advisory Council (CCRUP) had contacted the MAC about the potential relevance of developing joint advice on the mentioned topic. At the time, the Executive Committee agreed that, if CCRUP decided to proceed with advice focused on technical assistance for a better implementation of Turtle Excluder Devices, it would be appropriate for the CCRUP to proceed alone. If the CCRUP decided to include references to the international market, then the MAC should be formally consulted. The Chair expressed availability to consider the matter again.

Rui Ludovino (DG SANTE) emphasised that, from a phytosanitary point-of-view, India must comply, at all times, with all the relevant EU legislation, including on controls of residues and hygiene.

Katarina Sipic (AIPCE-CEP) highlighted that India had recently submitted evidence aiming to demonstrate practical implementation to meet EU requirements. Ms Sipic underscored the urgency of resolving the situation. She wanted to know the Commission's view on the evidence provided, particularly whether the Indian authorities were moving in the right direction

Rui Ludovino (DG SANTE) responded that the dossier was under assessment. Mr Ludovio highlighted that many exchanges between the Commission and the Indian authorities were taking place, including requests for further information.

Unfair Trading Practices (UTP)

- **Presentation on the ongoing evaluation by Francesco Gianola (AGRI A3)**

Francesco Gianola (DG AGRI) recalled that the Unfair Trading Practices (UTP) Directive aims to address unfair trading practices in business-to-business relationships within the agricultural and food supply chain. Its primary focus is on addressing bargaining power imbalances between suppliers and buyers and establishing a minimum level of harmonisation across EU Member States. Key provisions include the prohibition of sixteen unfair trading practices, divided into 'black' (always prohibited) and 'grey' (allowed only with prior agreement). The Directive protects farmers and small suppliers with turnovers up to EUR 350 million, and applies to both EU and non-EU operators where at least one party is located in the EU. As a minimum harmonisation instrument, Member States may maintain or adopt national rules that go beyond the Directive's provisions, provided they are compatible with the internal market. The evaluation focuses primarily on the EU and does not extend to third countries, with the publication of the Report and Staff Working Document expected at the end of 2025.



Mr Gianola explained that the ongoing evaluation relies on multiple sources. Annual monitoring includes the Joint Research Centre's public survey for suppliers, notifications from the Member States on cases, and meetings of the Enforcement Authorities Network. An external evaluation support study gathers extensive primary data through targeted surveys of Member States's Competent Authorities and EU wholesalers and retailers, workshops with stakeholders and enforcement authorities, around 100 interviews, ten case studies in selected supply chains and Member States, and consultation of SMEs via the Enterprise Europe Network, covering also SME operators primarily acting as buyers, although the response rate was low.

Mr Gianola highlighted that several challenges have been affecting the evaluation process. The Directive's transposition across all Member States was only completed in 2022, creating a limited timespan for assessment. Member States started from different baselines and implemented the Directive in varied ways, sometimes exceeding minimum harmonisation requirements. Information collection is challenging due to private contractual relationships and a "fear factor" among suppliers. Additionally, cascading effects along the supply chain, limited empirical literature for the post-adoption period, and the novel nature of the instrument have all been complicating the assessment.

Underlining that the evaluation is still ongoing, Mr Gianola presented a preview of preliminary findings of the evaluation support study. He outlined that, regarding effectiveness, the evaluation study focuses on the implementation and enforcement of the Directive in combating unfair trading practices, the occurrence of unintended effects, cooperation among Enforcement Authorities, and mitigation of negative impacts on farmers. Preliminary findings show that the effectiveness of the Directive is still emerging due to the short implementation period and differences in transposition choices among Member States. Consolidated trends are difficult to assess, as many stakeholders report limited experience with the Directive. Low numbers of reported unfair trading practices cases are partly attributed to lack of awareness and fear of retaliation. The role of Enforcement Authorities is crucial, yet challenges remain in using *ex officio* investigations and overcoming the "fear factor." Tools such as public campaigns, written contracts, reputational sanctions, and civil remedies have proven effective, and cooperation within the UTP Enforcement Network has enhanced enforcement. However, the lack of a legal basis for cross-border sharing of confidential information remains a barrier, prompting the European Commission to propose a new Regulation to strengthen cooperation between Enforcement Authorities.

Mr Gianola, referring to the evaluation support study, further outlined that, in terms of efficiency, costs and benefits have been assessed for both national authorities and business operators. The main costs for operators relate to modifying contracts to comply with the Directive, varying by role in the supply chain, size, contractual complexity, and national implementation. Farmers acting mainly as suppliers incur negligible costs, while processors, who act as both suppliers and buyers, and retailers, mainly buyers, face higher costs. Benefits include clearer and more transparent contracts, reduced unilateral changes, and more predictable payment terms. Farmers experience significant benefits at minimal cost, while processors find costs



proportionate to benefits. Retailers report limited benefits and higher costs. Overall, for the targeted stakeholders, the benefits appear to outweigh the costs, and national authorities share this assessment.

Mr Gianola highlighted that, in the study, the relevance of the Directive is generally confirmed by wide agreement among national authorities and business stakeholders in the farming and processing stages. Some retailers, however, noted that the Directive does not fully address underlying bargaining power imbalances or price formation mechanisms. Potential improvements brought forward by consulted stakeholders include removing turnover thresholds to extend protection to all suppliers, introducing bi-directional protections against unfair trading practices, and explicitly prohibiting sales below production cost. Emerging practices include requests from retailers for suppliers to fund voluntary social or environmental initiatives and growing use of “pay on scan” retail models, albeit they do not seem widespread.

Mr Gianola explained that coherence has been examined between the Unfair Trading Practices Directive and other EU initiatives. The Common Market Organisation Regulation addresses structural bargaining imbalances, while the Unfair Trading Practices Directive protects individual relationships. The Late Payments Directive complements the Unfair Trading Practices Directive by ensuring more timely payments. EU competition law addresses market power and abuse, while the Unfair Trading Practices Directive extends protection upstream to agricultural producers focusing on bargaining power. A noted limitation is that turnover is used as a proxy for bargaining power, which may not fully capture relative power dynamics but facilitates enforcement when necessary.

Mr Gianola added that the preliminary assessment is pointing the Directive has created EU added value by establishing minimum protection for suppliers across the EU, harmonising prohibited practices across Member States, and raising awareness of unfair trading practices. While differing transposition choices may challenge operators and create varying levels of protection, the Directive has successfully introduced a baseline of harmonisation and improved minimum level protection for suppliers across the EU.

- **Presentation of the legislative proposal on cooperation among enforcement authorities by Antigoni Tsakona (AGRI E1)**

[Presentation](#)

Antigoni Tsakona (DG AGRI) presented the legislative proposal on cooperation among enforcement authorities, explaining that it responds to concerns raised by farmers during the 2024 protests, highlighting the need to strengthen farmers’ bargaining power and restore trust in the food chain. Ms Tsakona recalled that the March 2024 reflection paper and the Strategic Dialogue Recommendations of September 2024 emphasised a fair and competitive food value chain and called for cooperation between national enforcement authorities responsible for the enforcement against unfair trading practices in cross-border cases, including a common online platform for sharing investigations and case information. Enforcement authorities had expressed the need for EU-level regulation and harmonisation, with the majority agreeing



that detailed rules were required. The proposal also aligns with the forthcoming evaluation of the Unfair Trading Practices Directive that will be published in the course of November 2025.

Ms Tsakona explained that the scope of the proposal covers the enforcement of unfair trading practices in business-to-business relationships within the agricultural and food supply chain that have been harmonised at the EU level, with a particular focus on cross-border dimension. It includes mutual assistance, enforcement of decisions, and coordinated actions where it encourages alignment between Member States, while respecting national legal systems. The Commission representative clarified that the proposal does not affect national rules on private international law or judicial cooperation, and judicial and criminal matters remain under national jurisdiction. A voluntary option allows Member States to opt and allow enforcement authorities to exchange information on stricter national unfair trading practices rules, while still allowing enforcement authorities to refuse such requests.

Ms Tsakona further explained that, for cases involving two Member States, a mutual assistance mechanism under Articles 6–12 is established. Requests for information must comply with national laws, with deadlines of 60 days unless otherwise agreed, and authorities must provide explicit reasons if they refuse a request. Requests for investigatory measures enable officials of the requesting enforcement authority to participate in the investigations with mutual notification of steps taken required. Enforcement of decisions applies only to those no longer contestable in a national legal order, ensuring that all avenues within the requesting territory have been exhausted. A notification mechanism ensures that all enforcement authorities are informed within one month of the establishment of the occurrence of an unfair trading practice with a cross-border dimension, and language arrangements are agreed between authorities, defaulting to national official languages if necessary. Implementing acts may standardise the forms used for mutual assistance requests if this is considered necessary.

Ms Tsakona added that, for cases involving more than two Member States, coordinated actions under Articles 13–20 are launched when there is reasonable suspicion of a widespread unfair trading practice affecting at least three Member States. A coordinator is designated, and authorities must provide explicit reasons if they refuse to participate. Investigations and enforcement measures must be conducted in a coordinated manner while respecting national procedural rules, and the outcomes are summarised in a common statement reflecting national decisions. Enforcement measures under Article 6 of the Unfair Trading Practices Directive may be applied as necessary. The cessation of coordinated actions occurs once the widespread cross-border unfair trading practice has ended or investigations confirm it did not occur. Language arrangements are similarly agreed among authorities, defaulting to the notifying Member State's official language if no consensus is reached. Alerts aim to inform all enforcement authorities and the Commission, with the objective of acting without delay once reasonable suspicion arises.

- **Exchange of views**
- **Way forward**



The Chair highlighted the specificity of the fishery and aquaculture products sector, as there was significant transborder trade across the EU. The Chair mentioned that small producers and small marketing and processing structures faced a context of concentration in the retail sector, particularly in some Member States. Therefore, stakeholders should look into how the legislation would be implemented, particularly in the context of competition along the supply chain.

EU Strategy for External Fisheries Action

- **Consideration of draft advice on “EU Strategy for External Fisheries Action”**

The Chair recalled that a questionnaire was circulated from 9 to 31 July 2025 to collect feedback from the members. Following the formal circulation of the draft advice, preliminary feedback was submitted by several members ahead of the meeting. The Chair proposed to start with the consideration of the draft recommendations listed in section 4 of the document.

Guus Pastoor (Visfederatie) expressed concern about the length and repetitiveness of the document, encouraging the members of the Working Group to take a disciplined approach.

Concerning draft recommendation c) on addressing the imbalance in the level playing field between EU and non-EU operators, Mr Pastoor suggested to add “any possible”.

Concerning draft recommendation d) on engagement with third countries, Mr Pastoor requested to know why, in their preliminary feedback, Oceana sought a deletion of the reference to “quality”. In his view, quality was an essential element of trade. He added that he would not oppose the reference to “sustainability”.

Mr Pastoor expressed support for the suggestion from Conxemar to add a new recommendation on a supply to the EU market that enables the processing industry and traders to provide consumers with balanced and nutritious diets.

Vanya Vulperhorst (Oceana) informed that her organisation would not oppose maintaining the reference to “quality” in draft recommendation c). Ms Vulperhorst requested more information on the reference in draft recommendation g) to threats to sustainability caused by unilateral and uncoordinated management.

The Secretary General informed that the reference in draft recommendation c) originated in reply provided by European Fishmeal to the questionnaire, which mentioned unilateral unsustainable fisheries management decisions by third countries, such as Norway.

Gaëtane Le Breuil (European Fishmeal) stated that the issue was not limited to Norway, but to the overall situation in the Northeast Atlantic Ocean. Ms Le Breuil suggested amending the text to read “of shared stocks by the relevant coastal State”.



Christine Absil (Good Fish) expressed concern for the lack of clarity in the sentence. Ms Absil highlighted that fishing stocks were moving due to climate change. When coastal States suggest new ways of setting quotas, the discussion becomes a political one, rather than simply an issue of science-based fisheries management.

Gaëtane Le Breuil (European Fishmeal) suggested reformulating to read “to promote science-based fisheries management at international level”.

Christine Absil (Good Fish) called for a more neutral approach by the Working Group on the topic. Ms Absil suggested to delete the second half of the sentence, maintaining the first part.

Julien Daudu (EJF) expressed support for the approach suggested by Ms Absil. Mr Daudu highlighted that the case of mackerel stocks, which was implicitly referenced, was extremely complex for the whole sector.

The Chair suggested dividing the issues of promoting science-based fisheries management and of unilateral actions into two separate recommendations.

Christine Absil (Good Fish) suggested a deletion to the reference to “unilateral” actions.

Isabelle Garzon (DG MARE), concerning draft recommendation i) on a “zero-tolerance” approach to IUU fishing, recalled that this was achieved through the IUU Regulation. The other pieces of legislation mentioned in the draft recommendation referred to other matters. Therefore, for technical accuracy, the other legal references should be deleted.

Julien Daudu (EJF) expressed agreement with Ms Garzon.

Thibault Pivetta (EMPA), concerning draft recommendation j) on striving for coherence, suggested a more explicit reference to “aquaculture”.

Marine Cusa (Oceana), concerning draft recommendation p) on responsible food systems and food security, suggested replacing “contribute to” with “safeguard”.

The Chair agreed that Sustainable Fisheries Partnership Agreements safeguarded food security in the EU. In his view, in the case of food security in partner countries, it was a matter of “contributing to”, not “safeguarding”.

Marine Cusa (Oceana) acknowledged that there could be differences between the EU and partner countries. Therefore, she would not oppose maintaining the original reference to “contribute to”.

Adrien Simonnet (UMF) suggested that, in addition to a reference to the “long-term viability of EU fleets”, the draft recommendation should also mention the viability of coastal communities. Mr Simonnet also suggested adding a reference to support to operators in the implementation of the agreement.



Vanya Vulperhorst (Oceana) responded that, under the Sustainable Fisheries Partnership Agreements, there was a payment for EU operators to access the waters of third countries. Therefore, the agreements in themselves were a way of supporting EU operators. Ms Vulperhorst expressed disagreement that the EU should only prioritise EU citizens / communities in the implementation of these agreements.

The Chair expressed doubt about the relevance of referring to “EU coastal communities” in the context of Sustainable Fisheries Partnership Agreements.

Julien Daudu (EJF) mentioned that it could be more appropriate to refer to “EU fleet and its ecosystem”.

Adrien Simonnet (UMF) withdrew his suggestion.

Janne Posti (Conxemar) asked for the recommendation previously suggested by his organisation to be moved higher in the list, becoming recommendation d).

Vanya Vulperhorst (Oceana) suggested adding references to “sustainability” and “traceability”.

Marine Cusa (Oceana) suggested adding “without compromising global food security”.

The Chair argued that the reference to “food security” should be only in relation to the EU and “partner countries”. The focus should be on countries with whom the EU has signed agreements.

Marine Cusa (Oceana) emphasised the EU’s role in global fisheries and the importance of strengthening fisheries governance, maintaining the view that “global food security” was the appropriate terminology.

The Chair responded that the EU should be concerned about the EU food security and protecting EU citizens. In his view, the EU could not be expected to ensure food security across the world, for example in China.

Isabelle Garzon (DG MARE) recalled that the issue under discussion was the EU’s approach to external fisheries action. The EU’s external action was linked to sustainable development, so the Commission sought increased coherence with development policy. The European Commission was concerned about food security across various geographical areas. In the context of discussions in the UN, for example on the Fish Stocks Agreements, the Commission considered the impacts on the EU and in other countries. In the context of discussions in Regional Fisheries Management Organisations, the Commission considered the impacts of decisions on migratory stocks for third countries. Ms Garzon emphasised that, when reading a reference to “global food security”, DG MARE would not be concerned about China but would be considering the impact on many other countries.

Guus Pastoor (Visfederatie) underscored that the draft recommendation focused on market access and supply to the EU market, not extraction. The EU market faced increasing challenges in supply, including due to problems in fish stocks, and the exclusion of Russian from the Autonomous Tariff Quotas regime. Mr Pastoor emphasised that the focus should be in optimising trade market access, so that trade flows can take place smoothly. The EU would need to look for new partners willing to supply the EU market.



The Chair suggested that, to avoid a lengthy and confusing recommendation, a separate recommendation on food security could be drafted. The recommendation could focus on the participation of the EU in international fora, notably those of United Nations' level (e.g., FAO), and in bilateral relations.

Marine Cusa (Oceana) responded she was not opposed to focusing on market access to the EU.

Guus Pastoor (Visfederatie) expressed support for the approach suggested by the Chair.

The Chair suggested proceeding with informal exchanges between Oceana and Conxemar, potentially also Visfederatie, on how to approach the reference to food security in the recommendations.

Katarina Sipic (AIPCE-CEP) expressed concern about the added value of the draft advice for the European Commission. In her view, the text was overly repetitive, lacking practical expertise from the ground. Ms Sipic emphasised the importance of structural financial investments by the EU to achieve change, taking into account the limited financial capacity of the stakeholders. Support from global financial institutions, such as the International Monetary Fund, should also be considered. She encouraged members to reflect on these aspects, in case there was a written procedure.

The Secretary General recalled that the text was based on the replies from the members to the questionnaire. The Secretary General expressed availability to integrate any additions or deletions proposed by the members of the Working Group.

Isabelle Garzon (DG MARE) expressed willingness from the European Commission to receive advice from the MAC on the EU strategy for external fisheries action, ideally in the near future. Ms Garzon informed that DG MARE was considering the feedback received under the various consultations as well as studies. Therefore, ideally, the mentioned advice would be received by the end of 2025.

Ms Garzon informed that, since the communication was expected in 2026, she would like to hold, at a future opportunity, a comprehensive exchange on specific aspects with the members of the Working Group. In her view, some of the paragraphs of the draft text seemed rather generic, while others provided more details on the expected way forward. The focus should be on effective action and how to improve articulation between the various EU instruments.

- **Way forward**

The Chair proposed to proceed with a written consultation. The Chair encouraged members to keep in mind the requests from Ms Garzon, including by avoiding generic content. The focus should be on market aspects.

The Secretary General suggested to hold informal exchanges on some of the pending issues, including the draft recommendations on market access and food security, with the most interested members. Afterward, a formal written procedure would be launched, allowing all members to consider the document. If



agreement could not be reached via the written procedure, then the document could be considered again at the December 2025 meeting.

Guus Pastoor (Visfederatie) recalled that recommendations could be agreed by majority, not necessarily by consensus. In his view, in the short-term, the focus should be on the agreed recommendations. Their practical implementation could be discussed at a later stage.

The Chair encouraged members, under the written procedure, to focus on simplification, not additions.

The Secretary General expressed availability to coordinate with Ms Garzon regarding the possibility of a comprehensive exchange on specific aspects of the upcoming strategy.



Summary of action items

- Trade Agreements & Trade Policy Instruments:
 - At the next meeting, exchange with DG MARE representatives on the trade agreements with Mercosur and with Mexico to be scheduled.
- EU Strategy for External Fisheries Action:
 - Secretary General to informally exchange with the most interested members on the pending aspects, including the draft recommendations on market supply and food security.
 - Draft advice to be considered via a written procedure.
 - Secretary General to coordinate with DG MARE on the possibility of a comprehensive exchange on specific aspects of the upcoming strategy.



Attendance List

Representative	Organisation	Role
Adrien Simonnet	Union du Mareyage Français (UMF)	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
Antigoni Tsakona	European Commission	Expert
Aodh O'Donnell	Irish Fish Producers Organisation	Member
Arthur Yon	FROM Nord	Member
Aurelio Bilbao Barandica	OPESCAYA	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
Elisa de los Reyes Bordón Rodríguez	Canary Islands	Observer
Fabian Schäfer	Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.	Member
Fabijan-Hrvatin Peronja	OP Friska Riba	Member
Felicidad Fernández	ANFACO-CYTMA	Member
Francesco Gianola	European Commission	Expert
Gaëtane Le Breuil	European Fishmeal	Member
Gerd Heinen	European Commission	Expert



Representative	Organisation	Role
Giorgio Rimoldi	ANCIT / Unione Italiana Food	Member
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
Isabelle Garzon	European Commission	Expert
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	FECOPECA	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	Member
Juliette Marguerite	European Salmon Smokers Association (ESSA)	Member
Justyna Radzewicz	Poland	Observer



Representative	Organisation	Role
Katarina Sipic	EU Fish Processors and Traders Association (AIPCE) / European Federation of National Organizations of Importers and Exporters of Fish (CEP)	Member
Kinga Malinowska-Facci	European Commission	Expert
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
Pawel Szatkowski	European Commission	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	Chair
Pim Visser	NOVA	Member
Poul Jensen	Danish Seafood Association	Member
Rafael Piñero	EuroCommerce	Member
Rosalie Tukker	Europêche	Member
Rui Ludovino	European Commission	Expert
Sarah Hautier	EuroCommerce	Member
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



Representative	Organisation	Role
Yobana Bermúdez	EU Fish Processors and Traders Association (AIPCE)	Member

