

## Working Group 2: EU Market

### Minutes

Monday, 1 December 2025 (14:00 – 17:45 CEST)

Zoom

Interpretation in EN, ES, FR

Welcome from the Chair, Pierre Commère

[Presentation](#)

Adoption of the agenda and of the last meeting's minutes (18.09.25): Adopted

#### Action points

- **State-of-play of the action points of the last meeting – information**
- 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.
    - Agenda item 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.
    - Advice adopted on 17 November 2025.
    - Exchange to take place at the 5 February 2026 meeting of the Executive Committee

#### Trade Agreements & Trade Policy Instruments

- **Update on latest trade developments by Pawel Szatkowski, Sara Perucho Martínez (MARE B3), including:**
  - **Morocco (amendments to agricultural agreement)**

Pawel Szatkowski (DG MARE) informed that the EU and Morocco signed a new agreement by exchange of letters on 2 October 2025, extending the previous agreement of 2018. For the agreement to enter fully into



force, agreement from the European Parliament and the Council would be needed. In the meantime, the agreement would be provisionally in force. Mr Szatkowski explained that there were two new elements regarding tariff preferences for products from Western Sahara. First, the products must be identified with a specific indication of origin. Secondly, the benefits from the agreement should go towards the people of Western Sahara.

The Chair requested more information on what would happen to the provisional implementation of the new agreement, in case there were challenges in the ratification by the European Parliament.

Giorgio Rimoldi (ANCIT) asked for more detail on the expected labelling requirements. Mr Rimoldi highlighted that certain products, such as vegetables from the Western Sahara, were impacted by the judgments of the Court of Justice of the European Union. He also asked about potential implementing acts from the European Commission.

Pawel Szatkowski (DG MARE) responded that he was unable to comment on the ratification by the Parliament. Concerning labelling, Mr Szatkowski responded that there were no changes for fishery and aquaculture products from Morocco. There would be no changes to the catch certificates or to the sanitary and phytosanitary documentation.

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

Pawel Szatkowski (DG MARE) informed that the second round of negotiations took place in November 2025. There were no specific discussions on the rules of origin chapter. No offers were exchanged on tariffs. Concerning the chapter on trade and sustainable development, an initial exchange of views took place, but nothing specific on the content had been agreed. He added, if there were further developments, these would likely take place at the beginning of 2026.

- **United Arab Emirates (negotiation of Free Trade Agreement)**

Sara Perucho Martínez (DG MARE) explained that the latest round of negotiations took place in October 2025 in Dubai. The fourth round would take place in Brussels in the following week. Ms Perucho informed that, on market access, there were no new developments. Initially, DG TRADE was suggesting a full liberalisation for fishery and aquaculture products. Nevertheless, DG MARE called for the exclusion of nine tariff lines, including the ones for canned tuna. The exchanges were still ongoing. On rules of origin, the United Arab Emirates accepted the position of the EU, including some flexibilities for smoked salmon. On the trade and sustainable development chapter, limited progress had been achieved. The United Arab Emirates did not want to include references to international conventions not ratified by their side, but the issue was that this country had not ratified any of the relevant conventions. Therefore, the Commission encouraged the United Arab Emirates to present a text that would cover the main rights and obligations foreseen in international conventions. The outcome remained unclear.

Felicidad Fernández (ANFACO-CYTMAR) requested more information on the flexibilities foreseen for smoked salmon products.



Sara Perucho Martínez (DG MARE) explained that, usually, rules of origin in free trade agreements include a “wholly obtained” requirement. Flexibility was foreseen to allow products imported and processed in the EU and exported to third countries. For example, EU operators could import larvae and then raise the fish in the EU.

Kinga Malinowska-Facci (DG MARE) underscored that the flexibility was specifically for smoked salmon to cover cases where the raw material is imported.

- **Potential updates (depending on status of the corresponding legislative/consent procedures) by Kinga Malinowska-Facci (MARE B3):**
  - **Mercosur (decisions on Partnership Agreement and interim Trade Agreement)**

Kinga Malinowska-Facci (DG MARE) informed that the ratification procedure was ongoing. The preparatory steps by the Commission were finalised, so it was up to the Council and the Parliament. Ms Malinowska-Facci recognised that the file remained politically sensitive.

Felicidad Fernández (ANFACO-CYTMAR) recalled that there were two proposals under consideration, a global agreement and an interim trade agreement. Ms Fernández wondered whether adoption by 20 December 2025 could be expected. She also wondered if provisional implementation of the trade agreement in the meantime would be possible.

Kinga Malinowska-Facci (DG MARE) responded that she would prefer not to speculate on the timelines for the ratification of the agreement with Mercosur.

Giorgio Rimoldi (ANCIT) asked for more information on the ratification processes by the Mercosur countries, particularly the potentially differing practices across the four member countries. Therefore, there could be an impact on the simultaneous ratification of the agreement.

Kinga Malinowska-Facci (DG MARE) responded that she would have to check internally on the ratification processes of the Mercosur countries, but that, generally, the ratification processes were deemed to be smoother than the EU’s one.

- **Mexico (decisions on Global Agreement and interim Trade Agreement)**

Kinga Malinowska-Facci (DG MARE) informed that the ratification procedure was also ongoing. There was no fixed date for the signature. Ms Malinowska-Facci explained that the agreement was negotiated as “EU-only agreement”, meaning an agreement which covers exclusively areas under EU competence and to which Member States are not individually parties.

The Chair wanted to know whether the existing agreement would remain in place until the ratification of the new agreement is concluded.



Kinga Malinowska-Facci (DG MARE) confirmed that the existing agreement continued to apply.

- **USA (internal procedures to implement the Framework Agreement)**

Kinga Malinowska-Facci (DG MARE) explained that the agreement was in the phase of implementation. A document was sent to the USA covering different aspects of implementation. A list of products for potential return to Most Favoured Nation-treatment, which covers fishery and aquaculture products was also compiled. Ms Malinowska-Facci emphasised that the Commission would be seeking removal of additional tariffs, including on fishery and aquaculture products, particularly for the products for which the USA have import interest and higher dependency. Regarding implementation of tariff deal by the EU celebrated last Summer, the establishment of import quotas is ongoing.

### Fisheries Control Regulation

- **Update on the study on feasible traceability systems for prepared and preserved fishery and aquaculture products by Macarena Davies (Tetra Tech)**

#### Presentation

Macarena Davies (Tetra Tech) explained that the study was commissioned by DG MARE and CINEA and focused on traceability systems and minimum information for lots of specific fishery and aquaculture products. The study was launched in early 2025 and would run for 18 months. Therefore, the study was still in the early stages, even though the first interim report had been recently submitted.

Ms Davies emphasised that the methodology and tasks of the study are structured to provide a comprehensive assessment. Task 1 focuses on project management and methodology, including a Key Performance Indicators tracker, risk log, and stakeholder database. Task 2 covers an overview of existing traceability systems and relevant information through extensive desk research and national profiles. Task 3 involves 16 planned case studies across eight EU Member States, including field visits and structured questionnaires with processors. Task 4 maps traceability systems in supply chains, from manual to fully digital, and establishes a cost framework. Task 5 identifies minimum traceability elements for prepared and preserved fishery and aquaculture products and assesses their feasibility. Task 6 develops recommendations for traceability systems for these products, while Task 7 evaluates the impact of digital traceability on fresh and frozen products using a supply chain-based cost/savings framework. Finally, Tasks 8 and 9 focus on seaweed and algae traceability, combining desk review and stakeholder engagement.

Ms Davies outlined the study's methodology, which includes desk research, analysis of literature, regulatory frameworks, and benchmarks from other food sectors. Case studies involve field visits in eight Member States (Spain, France, Italy, Germany, the Netherlands, Denmark, Poland, and Portugal), along with structured questionnaires and both remote and in-person interviews with processors, retailers, authorities, technology providers, and associations. Cost estimations are conducted using a Standard Cost Model and comparative benchmarking. She informed that progress was made on Tasks 2, 4, 6, and the seaweed section, with over half of the case study visits completed. Stakeholder consultations had included over 70



questionnaires, more than 24 remote meetings, and several in-person events. Methodologies for cost analysis had been finalised, and the first interim report was under revision, with the final version expected in early December 2025.

Tracy Murai (Poseidon), concerning the next steps, explained that stakeholder consultations would continue until March 2026. Key upcoming deliverables included completing case study visits, conducting in-person interviews and write-ups in the eight EU Member States, remote interviews with national authorities, industry actors, tech providers, NGOs, and selected third-country contacts. The first interim report had been planned to be finalised in December 2025, the second interim report with consultation findings and cost analysis in early May 2026, and the final report in early November 2026.

Ms Murai highlighted that the emerging findings from the study indicated that existing traceability systems are generally reliable and widely implemented with a “one step-back – one-step forward” approach. Digital systems exist, but manual data entry remains a bottleneck. Small-scale operators face significant barriers due to the disproportionate task and small lot sizes, sometimes as little as 2 kilograms or even a single fish. She added that there is considerable uncertainty around the implementation date of 10 January 2026, particularly regarding obligations and consequences for non-compliance. Stakeholders demonstrate a willingness to comply but require clarity, purpose, and feasible implementation measures. Furthermore, competitiveness concerns against third-country producers remain a key consideration.

- **Update on the upcoming traceability requirements for fresh and frozen fishery and aquaculture products by Commission representatives (MARE D4)**

Marta Moren Abat (DG MARE) informed that she was coordinating the implementation of the Fisheries Control Regulation. Ms Moren Abat emphasised that, while the ongoing study focused on prepared and preserved fishery and aquaculture products, the timeframe for fresh and frozen products was different. The new traceability requirements for fresh and frozen products would enter into force in 2026.

Pierandrea Leucci (DG MARE) recalled that, in January 2024, the new amending regulation to the Fisheries Control Regulation entered into force. Some provisions immediately entered into force, while other provisions had different timings. He highlighted that the European Commission immediately started working on the development of the corresponding implementing legislation, including through a review of the existing implementing framework. The amending regulation introduced several changes in the empowerments provided to the Commission, including specific timeframes. In some cases, the empowering provisions imposed requirements on the Commission, while other times these were not compulsory.

Mr Leucci explained that, in September 2025, the Commission began the official process to adapt the implementing rules. In the draft legislation, two provisions on traceability, covering technical requirements and marking of lots, were included. According to feedback provided by the Member States, the draft articles did not fully address the issues raised by Article 58 of the Fisheries Control Regulation. Under the public consultation, stakeholders drew attention to several challenges related to international standards, and



related to the merging of lots before the first sale. Therefore, the Commission concluded that the draft articles required further discussion before adoption as legislation.

Mr Leucci informed that, after the decision to remove the two articles from the draft act, the Commission initiated internal processes to collect more input from operators. A stakeholder consultation was expected to be launched in the following weeks. In the meantime, several stakeholders had already expressed availability to exchange with DG MARE. He acknowledged that there could have been some miscommunication or information gaps from the Commission to the stakeholders. The Commission representative emphasised that the Commission did not expect that, on 10 January 2026, there would be fully digital and interoperable systems. Nevertheless, in some Member States, there was already some digital transmission across the supply chain taking place. He expressed willingness to hear about specific regulatory challenges faced by the operators.

Marta Moren Abat (DG MARE) emphasised that the Commission would be reaching out to stakeholders. A questionnaire to collect input was under preparation. Ms Moren Abat expressed willingness to exchange again after the circulation of the questionnaire.

The Chair expressed concern that the lack of implementing rules on traceability could lead to a potential legal vacuum on 10 January 2026.

Vanya Vulperhorst (Oceana) requested more clarity on the planned next steps, particularly on whether Article 58 meant that delegated acts were needed for products under Chapter 03 of the Combined Nomenclature. Ms Vulperhorst wondered whether the responses to the stakeholder questionnaire would determine the need for a delegated act.

Tracy Murai (Poseidon) explained that, in the context of the ongoing study, the consultants were also taking into account fresh and frozen products, since companies generally trade both fresh and frozen and prepared and preserved products.

Poul Melgaard Jensen (Danish Seafood Association) expressed availability to continue exchanging with DG MARE, but underscored that the date of 10 January 2026 was soon approaching. Mr Jensen highlighted that Danish stakeholders held several interviews with the consultants. Therefore, he wanted to know how the new stakeholder consultations would differ from those exchanges.

Tomasz Pyjor (PSPR) argued that there was a structural problem across the supply chain, since over 90% of companies were not prepared for the implementation of traceability in a digital way. Mr Pyjor recalled that fishery and aquaculture products under Category 03 of the Combined Nomenclature included also smoked and live products, not only raw materials. Aquaculture products were covered by the digital traceability requirements, but were not covered by the IUU Regulation. In his view, operators were lacking clarity on the definition of “digital”, for example on whether the submission of a PDF document could be considered to be digital transmission. He underscored that customers, specifically retailers, expect to receive the necessary



information to ensure compliance. The data would need to be shared in a way that is acceptable to the retailers, but, usually, each retailer has their own system.

The Chair recognised that the current doubts referred to the new traceability requirements for fishery and aquaculture products under Chapter 03 of the Combined Nomenclature.

Pierandrea Leucci (DG MARE) acknowledged that stakeholders already shared information with the Commission and with the external consultants. Mr Leucci encouraged the members to reach out for bilateral exchanges. The aim was to avoid duplicated consultations. Considering the different actors across the supply chain, the aim would be to provide clarifications and streamline the process. He recalled that the three main novelties of the draft act were the introduction of a retention period for the information, the use of international standards, and an exception for merged lots. Further implementing rules could be developed to clarify further issues. In his view, from 10 January 2026 onward, the existing rules could already be implemented. The Commission would aim to clarify the message, so that there were no doubts on the minimum standards. He added that digitalisation was already in place in some Member States.

Marta Moren Abat (DG MARE) emphasised that the delegated act was independent from the Fisheries Control Regulation. Therefore, the retraction of the draft articles was not a problem for the compliance with Article 58 of the Fisheries Control Regulation by operators.

María Luisa Álvarez Blanco (FEDEPESCA) called for further clarity, particularly on the implementation period. Ms Álvarez mentioned that her organisation shared a significant amount of information with DG MARE beforehand. In her view, due to the pending doubts across the supply chain, a postponement of the implementation could be appropriate.

Adrien Simonnet (UMF) emphasised that operators shared several concerns on the implementation of the new rules, particularly on how to interpretate the legislation. Mr Simonnet asked about the planned timeline for the upcoming questionnaire. He also wanted to know about the potential impact of the ongoing study.

Àngels Segura Unió (AECOC) stated that her organisation received many questions from operators, which indicated a significant level of uncertainty. Companies were worried about the new rules. Ms Segura asked for more details on the definition of “digital”, particularly whether the transmission of information via email message was considered to be compliant. Moreover, she asked Ms Davies about the selection criteria to select companies to participate in the cases studies.

Thibault Pivetta (EMPA) agreed that there was a significant level of confusion among operators, requesting further clarity from the Commission. Mr Pivetta asked for more information on the methodology of the upcoming questionnaire. He also asked Ms Davies about whether the shellfish industry had been included in the ongoing study.



Huw Thomas (GDST) argued that transmission of data via PDFs, emails, and spreadsheets was a digital way of transmission, but was not interoperability. Mr Thomas further argued that interoperability should be covered by the legislation, to ensure alignment in the supply chain, plus standardisation of formats, procedures, and protocols. In his view, Member States had not sufficiently considered data collection needs. While it was not necessary for industry operators to agree on the data collection requirements, a system for transmission was necessary. He informed that his organisation was working on the development of a system by 2030, which would also be useful for third countries. The mentioned tool would translate PDF files, email messages, and spreadsheets into a digital and interoperable system. Solutions for small-scale operators were also under development.

Mike Turenhout (Visfederatie) stated that, in the Netherlands, operators shared many pending questions on the new traceability rules. Companies were working on ways to collect the necessary data, including the various spreadsheets from buyers. From an administrative perspective, these efforts were significantly time consuming, particularly for companies handling mixed lots. The transmission of information remained challenging. Therefore, further clarity and further standardisation were needed.

Marta Moren Abat (DG MARE) recalled that Article 58, published in January 2024, detailed the obligations for operators and for Member States. The possibility of adopting delegated acts did not impact the obligations on operators. Ms Moren Abat emphasised that DG MARE could not replace the national authorities. Nevertheless, the Commission was coordinating with the Member States. On 11 December 2025, a coordination meeting would take place between the Commission and the Member States. The Commission representative thanked Mr Thomas for the constructive feedback on implementation possibilities. She explained that Article 58 does not require interoperability. Furthermore, the ongoing study was being coordinated by a third party, meaning that it was separate from the work of the Commission.

Pierandrea Leucci (DG MARE) responded that the Commission would take note of the concerns expressed. Mr Leucci emphasised the importance of a smooth transition and of an implementation with stakeholder engagement.

Patrick Murphy (Irish South & West Fish Producers Organisation) asked for more information on the consultations held with Member States and stakeholders. Mr Murphy also asked for information on potential financial support to help operators in the implementation of the new rules.

Poul Melgaard Jensen (Danish Seafood Association) requested more clarity on the definition of “digital” and the merging of lots. Mr Jensen highlighted that Danish operators undertake up to 40,000 transactions per year. In his view, imports needed to be considered. He provided the example of imports from small-scale Indian farmers for whom it would be challenging to share information in a digital way.

The Chair underscored that, according to the preliminary conclusions of the ongoing study, traceability was in place and was working well. Digital systems existed but seemed to be mainly in large enterprises. In his view, the weak point was the entrance point of data in the supply chain.



Tracy Murai (Poseidon) responded that the findings of the ongoing study showed general agreement among operators. The ongoing work covered various sectors. Ms Murai expressed availability to, after the meeting, share a document with more technical details, including the questionnaires sent to stakeholders.

Huw Thomas (GDST) argued that, if digitalisation occurred without interoperability, the EU industry would face increased costs. Operators would have to address multiple data entries and access different platforms, risking an overload of data. Mr Thomas recalled that, historically, traceability requirements focused on food safety. Therefore, it does not capture data on quality or social elements.

The Secretary General expressed availability to circulate the documents mentioned by the consultants. He suggested the scheduling of a follow-up exchange at the next meeting of the Working Group.

María Luisa Álvarez Blanco (FEDEPESCA) expressed significant concern about the lack of clarity provided by DG MARE, as demonstrated by the interventions of the various stakeholders. Ms Álvarez argued that there was contradiction with the ongoing simplification efforts of the Commission.

Pim Visser (NOVA) agreed that significant concerns remained. Mr Visser argued that engagement with stakeholders should have been strengthened earlier in the process.

- **Proposal of draft advice requesting the postponement of digital traceability requirements by Katarina Sipic (Seafood Europe)**

Guus Pastoor (Seafood Europe), in the absence of Katarina Sipic, presented the document, the reasons why it was prepared, and explained it had already received the support of several EU wide stakeholder's bodies. Mr Pastoor welcomed the exchanges held at the meeting but called for further clarity on what the Commission expects from the operators. He emphasised that companies have traceability systems in place, which cover requirements on food safety, fisheries control, and the fight against IUU fishing. Operators will be expected to fulfil with new requirements, including collection of information on origin. Operators had been expecting a delegated act from the Commission to provide more detail on how the information would be transmitted across the supply chain. At the present moment, the supply chain used paper-based systems or systems established by retailers. Therefore, operators faced uncertainty on how to proceed from 10 January 2026 onward.

Mr Pastoor provided the example of a wholesaler in the Netherlands purchasing products from fish auctions from several countries by the end of one week. The product would be moved across various operators (e.g., wholesaler, retailer, fishmonger). The related information would usually be transmitted a few days later. In the case of very small lots, the collection of information remains very difficult. For retailers, it would be difficult to address products that come from several fishing areas, with use of different gears, and different production types. He argued that national authorities were also unsure about upcoming controls, since there was lack of clarity on the definition of "digital", for example on whether PDF files were sufficient. Therefore, there was a risk of differing implementations across the Member States.



Mr Pastoor underscored that his organisation was not opposed to the amended Fisheries Control Regulation, but argued that potential problems remained and that operators continued to have concerns regarding the upcoming implementation. In his view, the legislation was developed on the logic of products with only one species and one catch area. He called for the adoption of implementing rules that would allow a uniform implementation of the requirements across the EU, while also being feasible for companies.

The Chair, due to limited time available, suggested to proceed with a consideration of the draft text via an urgent written procedure.

Thibault Pivetta (EMPA) expressed support for the proposal of Seafood Europe. In case the MAC chose not to proceed with advice, his organisation would be available to subscribe to a separate letter with other stakeholders. Mr Pivetta emphasised that stakeholders were not opposed to having requirements on traceability for fishery and aquaculture products.

Vanya Vulperhorst (Oceana) recalled that, at previous meetings, members had the opportunity to exchange with DG MARE representatives on the draft provisions. Ms Vulperhorst expressed opposition to several of the recommendations suggested by Seafood Europe, particularly the request for a delay of the implementation. She emphasised that, from the beginning, there had been clarity that an EU-wide system would not be developed. The development of national systems had also been considered not to be essential. In practice, instead of transmitting paper documents, operators would be expected to share the information via PDF files, which, in her view, would be feasible for operators. She expressed support for the submission of a list of questions from the operators to the Commission. In case of advice on behalf of the MAC, Oceana would be requesting the recording of minority positions.

María Luisa Álvarez Blanco (FEDEPESCA) argued that a meeting to exchange on technical aspects should take place. In her view, the upcoming requirements were not in line with the Commission's overarching targets on simplification. She emphasised that operators continued to have many doubts.

Pim Visser (NOVA) drew attention to the significant costs of developing digital systems. Mr Visser agreed with Ms Álvarez that a technical meeting would be relevant, so that the new systems could be implemented properly.

Julien Daudu (EJF) expressed support for the submission of a letter requesting technical exchanges. Members could send questions to DG MARE in advance of such a meeting. In his view, the development of advice would be too time consuming. In case the Working Group decided to proceed with advice, his organisation would merge with the positions of Oceana.

Guus Pastoor (Seafood Europe) acknowledged that the timeframe was rather limited to develop advice. Mr Pastoor suggested to proceed with the text put forward by his organisation, while recording the minority positions. He agreed that it would be relevant to hold another meeting with DG MARE and that questions



should be submitted in advance. He emphasised that, across the Working Group, there was a clear majority to proceed with the development of advice.

Vanya Vulperhorst (Oceana) argued that the focus of the MAC should be on the development of delegated rules for products under Chapter 03 of the Combined Nomenclature. In her view, the suggested draft advice should not make references to the ongoing feasibility study for products under Chapter 16.

The Secretary General suggested to edit the text of Seafood Europe and then proceed with an urgent written procedure. Minority positions would be recorded. The Secretary General stated that he would send a request to DG MARE to hold another exchange at the February 2026 meeting of the Working Group.

### Market Supply

- **Presentation of the “EU Seafood Supply Synopsis 2025” by Mike Turenhout (Visfederatie)**

Mike Turenhout (Visfederatie) presented the “EU Seafood Supply Synopsis 2025”<sup>1</sup> in the name of “Seafood Europe”, the new name of the longstanding EU Fish processing and trade association “AIPCE-CEP”.

Mr Turenhout highlighted that the 2025 Edition showed that the total consumption of fishery and aquaculture products in the EU was estimated to reach 10.7 million tonnes (WFE – Whole fish equivalent) in 2024, representing a 5% increase compared to 2023. The growth was mainly driven by higher domestic production, which rose by 7% to 4 million tonnes WFE, alongside a continued increase in sourcing from third countries. As a result, EU import dependence had slightly decreased to 62.6%, although overall self-sufficiency remained low.

Mr Turenhout explained that demand for whitefish in the EU continued to decline, falling to 2.36 million tonnes WFE, which was 5% lower than in 2023. Alaska pollock and cod remained the most important species, but 94% of whitefish was sourced from outside the EU. Russia, the United States and Norway were the main suppliers, highlighting the EU’s strong reliance on external sources for this category.

Mr Turenhout further explained that tuna supply increased significantly in 2024, reaching 1.45 million tonnes WFE. The growth was driven by both EU fisheries and imports from third countries, while aquaculture remained stable. Ecuador emerged as the EU’s largest tuna supplier, benefiting from its free trade agreement with the EU, followed by China and Papua New Guinea.

Mr Turenhout emphasised that the salmon supply also continued to grow, reaching 1.41 million tonnes WFE, reinforcing its importance in the EU seafood market despite ongoing trade challenges. Shrimp supply rose to 861 thousand tonnes, with the vast majority imported from third countries, particularly Ecuador, Greenland, Vietnam, India and Argentina. The Autonomous Tariff Quotas were fully utilised. Imports from

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<sup>1</sup> <https://seafoodeurope.eu/aipce-cep/eu-seafood-supply-synopsys/>



Ecuador continued to grow, while future supply could be affected by stricter requirements on food safety that could restrict imports from some major exporting countries from 2026 onwards.

Mr Turenhout informed that the supply of pangasius, seabream and tilapia all increased in 2024. Pangasius remained almost entirely dependent on supplies from Vietnam, seabream supply was largely sourced from Turkey, and tilapia sourcing was dominated by China. These trends underlined the EU's dependence on third countries for several key farmed species.

Mr Turenhout drew attention to increasing tensions with coastal States, such as Norway, Iceland and the UK, which are affecting fisheries management and the trade of fishery and aquaculture products. Several geopolitical tensions, for example with Russia and the USA, would also have an impact. He recalled that, at the same time, the EU was pursuing new trade agreements and preparing for the mandatory introduction of the CATCH IT system in January 2026.

Mr Turenhout stated that, overall, the EU supply of fishery and aquaculture products was growing, but the outlook would be increasingly shaped by geopolitical pressures, a decline in wild whitefish stocks and a growing reliance on aquaculture, including salmon. He argued that ensuring access to sufficient raw materials would require maintaining traditional supply sources while developing new ones, supported by a strong and balanced EU policy framework.

### Fight against Illegal, Unreported and Unregulated (IUU) Fishing

- **Presentation of report on unregulated squid in the Southwest Atlantic by Jesus Urios Culianez (EJF)**

#### [Presentation](#)

Jesus Urios Culianez (EJF) outlined that, between 2017 and 2020, global fishing effort on squid increased by 70%, driven by rising demand, the expansion of distant-water fleets, and the depletion of certain commercial finfish populations. Around 86% of this effort occurred in unregulated areas, including the high seas and fisheries not subject to management by Regional Fisheries Management Organisations. In the international waters of the Southwest Atlantic, there was no fisheries management or international cooperation, compounded by a lack of information and transparency.

Mr Urios explained that research for the report included an expedition to the 'Mile 201', adjacent to the Exclusive Economic Zone of Argentina, with the Argentinian Coast Guard in February–March 2025, gathering testimonies from 169 crew members of squid fishing vessels, scientists from the National Institute for Fishery Research and Development (INIDEP), and Coast Guard personnel. Public information was sourced from trade databases, scientific publications, and government reports, while satellite Automatic Identification System data from Global Fishing Watch supplemented the analysis.



Mr Urios informed that the study found that around 343 squid fishing vessels operate annually at Mile 201, targeting Argentine shortfin squid (*Illex argentinus*), with vessels mainly from China (75%), Taiwan (18%), and South Korea (7%). Chinese vessels accounted for 91% of the fishing effort, with a 65% increase in fishing hours between 2019 and 2024, rising to 85% for Chinese vessels specifically. The Argentine shortfin squid is a transzonal species with a short one-year life cycle, making it highly sensitive to environmental conditions and overfishing. The lack of full management of the resource across Argentina's Exclusive Economic Zone and the high seas, coupled with uncontrolled fishing and unfavourable environmental conditions, had led to a collapse in squid populations. He added that testimonies from 169 crew members, representing 20% of the fleet, highlighted serious and widespread human rights and labour abuses, including deaths of five crew members on four Chinese vessels, physical violence, intimidation, salary retention, and deplorable working conditions. Environmental abuses were also reported, including obscuring vessel identification, shark finning, and the capture of charismatic megafauna.

Mr Urios highlighted that Spain was a key market for squid, being the second largest global importer after China, with 85% of national consumption imported and 65% of all EU squid imports entering via Spain. Argentine shortfin squid represented 13.3% of Spanish imports, sourced from China (41%), Argentina (39%), Taiwan (12%), and the Falkland Islands (7%), with 42.9% coming from unregulated areas such as Mile 201. Between 2019 and 2024, 47 Spanish importers bought 10,825 tonnes through intermediaries from five Chinese companies implicated in abuses and unregulated fishing, entering through ports including Valencia (45%), Vigo (27%), Bilbao (10%), Algeciras (9%), and Barcelona (2%). He argued that an uneven playing field exists, as around 30 Spanish trawlers operating at Mile 201 catch squid as an accessory species but are subject to stricter national and EU laws, including observers on board, area closures, and fisheries plans, competing directly with Asian fleets operating under unregulated conditions.

Mr Urios emphasised that EU squid supply chains are exposed to significant environmental and social risks, originating from unregulated fisheries linked to unsustainable practices, ecosystem degradation, and human rights violations. EU fishers face unfair competition from cheaper imports, undermining the sector. As a major market, the EU has both the influence and responsibility to act. Recommendations in the report include reinforcing EU import control mechanisms for high-risk species, such as Argentine shortfin squid, and promoting the establishment of multilateral governance structures for the conservation and management of the species in the Southwest Atlantic, alongside the adoption of the Global Charter for Fisheries Transparency by all coastal and flag States.

- **Exchange of views**

The Chair wanted to know whether the focus on Mile 201 was due to the convergence of squid in that area or due to the convergence of fishing vessels.

Jesus Urios Culiarez (EJF) responded that the squid goes from the Exclusive Economic Zone of Argentina towards the high seas, so there was a concentration of squid due to migration patterns. Foreign vessels also



concentrated in that area to avoid controls by Argentinian authorities. In the case of the Chinese fleet, transshipment practices were usual to avoid going into the ports.

Guus Pastoor (Visfederatie) argued that the described situation was not due to EU importers. Mr Pastoor, taking into account the one-year lifecycle of the species, requested more information on the expected impact of overfishing, particularly whether too many juveniles were being caught. He asked for Mr Urios's views on how to address the situation, particularly how strengthened import controls were expected to provide improvements. He particularly wanted to know what the criteria could be to check and refuse specific products.

Jesus Urios Culianez (EJF) responded that Argentinian scientists expressed serious concerns about the viability of the stock. Squid populations fluctuated considerably across the years. The specie was rather sensitive to environmental conditions. He added that other populations of squid had collapsed, becoming unprofitable to exploit. Mr Urios emphasised that the modus operandi of the Chinese fleet was well known, including illegal and unsustainable practices. Therefore, there should be more explanation requests and more scrutiny for consignments originating from China and Chinese flagged vessels. Member States could submit more verification requests or undertake more physical controls.

Guus Pastoor (Visfederatie) agreed that more checks via import controls was a possibility but wondered how the refusal of products could happen in practice. Mr Pastoor further wondered if a list of non-compliant vessels would need to be developed. While it would be possible to check catch certificates, making the distinction between various products would remain challenging.

Jesus Urios Culianez (EJF) expressed availability to provide a written reply with more details.

Janne Posti (Conxemar) acknowledged the importance of the topic and expressed condemnation for IUU practices and practices that violate human rights. Mr Posti expressed support for transparency, traceability, and regulatory compliance in the fishing sector. He recalled that Spain, the main importer of squid products, under the existing catch certification system, was considered the best performer across the EU.

Jesus Urios Culianez (EJF) recognised that Spain was deemed to be the best performer on import controls. Nevertheless, since products from unsustainable practices continued to enter the EU market, further work was needed from the public authorities.

The Secretary General asked members about the relevance of proceeding with advice on the topic. The recommendations outlined in the report could serve as a basis.

Jesus Urios Culianez (EJF) expressed availability to write a first proposal of draft advice.

Vanya Vulperhorst (Oceana) expressed support for the development of advice.



The Chair asked about the timeframe for the proposal. If there was no specific urgency, the proposal should follow the ordinary procedures.

Jesus Urios Culiarez (EJF) expressed availability to proceed at the beginning of 2026.

The Secretary General suggested to proceed with an ordinary written procedure in early 2026.

### EU Strategy for External Fisheries Action

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

The Secretary General recalled that advice on the upcoming EU Strategy for External Fisheries Action was adopted on 17 November 2025. At the request of DG MARE, a comprehensive exchange of views on the upcoming strategy would take place at the 5 February 2026 meeting of the Executive Committee. The exchange would count on the participation of the Director of MARE B, the MARE Advisor on International Affairs, and representatives from MARE B3. While the exchange would be under a meeting of the Executive Committee, all members were encouraged to participate.

The Secretary General highlighted that, at the 18 November 2025 Inter-Advisory Councils meeting, an exchange with Director-General Vitcheva on the strategy took place. At the European Ocean Days (March 2026), the Commission would also be seeking contributions for the strategy.

The Chair encouraged members to participate in the comprehensive exchange of views at the 5 February 2026 meeting.



### Summary of action items

- Fisheries Control Regulation:
  - o Consideration via an urgent written procedure of the draft advice proposed by Seafood Europe on upcoming digital traceability requirements for fishery and aquaculture products falling under Chapter 03 of the Combined Nomenclature.
  
- Fight against Illegal, Unreported and Unregulated (IUU) Fishing:
  - o Consideration via a written procedure of draft advice to be proposed by EJF on unregulated squid in the Southwest Atlantic.
  
- EU Strategy for External Fisheries Action:
  - o Comprehensive exchange of views with DG MARE representatives on the upcoming strategy to be held at the 5 February 2026 meeting of the Executive Committee.



## 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
Alexandre Bonneau	SNCE	Member
Andrea Fabris	API	Member
Angels Segura Unió	AECOC	Member
Anna Rokicka	Polish Association of Fish Processors (PSPR)	Member
Anne-France Mattlet	Europêche	Member
Brian Thomsen	Aquaculture Advisory Council	Observer
Camille Maisonneuve	Market Advisory Council (MAC)	Secretariat
Caroline Gamblin	PACT'ALIM	Member
Christine Absil	Good Fish Foundation	Member
Christophe Vande Weyer	European Commission	Expert
Claudio Pedroni	API	Member
Cristina Borges	Portugal	Observer
Dominic Rihan	Killybegs Fishermen's Organisation (KFO)	Member
Elena Ghezzi	COPA-COGECA	Member
Elvira Morote	OPP71 Almería	Member
Fabian Schäfer	Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.	Member
Felicidad Fernández	ANFACO-CYTMA	Member
Gaëtane Le Breuil	European Fishmeal	Member
Garazi Rodríguez Valle	APROMAR	Member
Gerd Heinen	European Commission	Expert
Giorgio Rimoldi	ANCIT / Unione Italiana Food	Member
Grace Howe	The Nature Conservancy	Member
Guus Pastoor	Visfederatie / Seafood Europe	Member



Representative	Organisation	Role
Helene Hotellier	EuroCommerce	Member
Huw Thomas	Global Dialogue on Seafood Traceability (GDST)	Member
Hommel Kassa	SNCE	Member
Iñigo Azqueta Ruiz-Gallardón	ANFACO-CYTMA	Member
Isabel Alonzo Cabezas	Spain	Observer
Janne Posti	Conxemar	Member
Jarek Zieliński	PFPA	Member
Javier Ojeda	Federation of European Aquaculture Producers (FEAP)	Member
Jennifer Reeves	Marine Stewardship Council (MSC)	Member
Jens Høj Mathiesen	Danish Seafood Association	Member
Jérémie Souben	FEDOPA	Member
Jesus Urios Culianez	Environmental Justice Foundation	Member
João Pereira	FRUCOM	Member
John Lynch	Irish South and East Fish Producers Organisation (ISEFPO)	Member
José Basílio Otero Rodríguez	Federación Nacional de Cofradías de Pescadores	Member
Juan Manuel Trujillo Castillo	ETF	Member
Jules Danto	European Association of Fish Producers Organisations (EAPO)	Member
Julia Echanove Gonzalez de Anleo	European Commission	Expert
Julien Daudu	Environmental Justice Foundation	Member
Julian Lamothe	European Association of Fish Producers Organisations (EAPO) / ANOP	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
Kinga Malinowska-Facci	European Commission	Expert
Laure Guillevic	WWF	Member
Lina Waara	Sweden	Observer



Representative	Organisation	Role
Linda Zanki Duvnjak	OP Friska Riba	Member
Macarena Davies	Tetra Tech	Expert
Malgorzata Kieliszewska	Poland	Observer
María Luisa Álvarez Blanco	FEDEPESCA	Member
Marine Cusa	Oceana	Member
Marta Janakakis	European Commission	Expert
Marta Moren Abat	European Commission	Expert
Matthew Gréant	Environmental Justice Foundation	Member
Mike Turenhout	Visfederatie	Member
Mirta Novak	Croatia	Observer
Nicolás Fernández	OPP72	Member
Patrick Murphy	Irish South & West Fish Producers Organisation	Member
Pawel Szatkowski	European Commission	Member
Pedro Hernandez Saez	CARBOPECA	Member
Pedro Luis Casado López	OPP80	Member
Pedro Reis Santos	Market Advisory Council (MAC)	Secretariat
Pierandrea Leucci	European Commission	Expert
Pierre Commère	Seafood Europe	Chair
Pim Visser	NOVA	Member
Poul Jensen	Danish Seafood Association	Member
Rafael Piñero	EuroCommerce	Member
Rita Santos	European Fisheries Control Agency (EFCA)	Observer
Roberto Alonso	ANFACO-CYTMA	Member
Ruth Nugent Neill	European Commission	Expert
Sara Perucho Martínez	European Commission	Expert
Sarah Hautier	EuroCommerce	Member
Sergio López García	OPP7 Burela	Member



Representative	Organisation	Role
Stefan Meyer	Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V.	Member
Sylvie Becaus	VVV	Member
Thibault Pivetta	European Molluscs' Producers Association (EMPA)	Member
Tomasz Pyjor	PSPR	Member
Vanya Vulperhorst	Oceana	Member
Xavier Pires	ALIF	Member
Yobana Bermúdez	Seafood Europe	Member

