

**Costas Kadis**  
**Commissioner for Fisheries and Oceans**  
European Commission  
Rue Joseph II 99  
1049 Brussels  
Belgium

Brussels, 2 February 2026

**Subject: Request for urgent corrective actions regarding the EU Fisheries Control Regulation**

Dear Commissioner Kadis,

On behalf of the representative bodies of the European fishing, fish processors, aquaculture and traders sector, we are writing to express our full support for the statement submitted by Member States to the Agriculture and Fisheries Council of 26 January 2026 concerning the difficulties in the implementation of Articles 14 and 58 of the Fisheries Control Regulation and the use of the CATCH IT system<sup>1</sup>.

We fully share the concerns raised by all Member States during the AGRIFISH Council discussion. As highlighted in their joint statement, the progressive entry into force of Regulation (EU) 2023/2842 is revealing a disproportionate increase in administrative and operational burdens that are not commensurate with actual control risks and contradicts the principles of proportionality, efficiency and effectiveness that should guide EU action. These concerns relating to the entry into force of the digital traceability provisions for fresh and frozen products were already highlighted by several organisations.

Further issues are arising and require your urgent attention. In particular, the new requirement to record all catches from zero kilograms and the strict application of the margin of tolerance create situations that are technically impossible to comply with under real fishing conditions, especially in mixed fisheries and on smaller vessels. These obligations increase navigational and safety risks for skippers, generate a high likelihood of unintentional infringements, and distort risk-analysis systems by portraying the sector as non-compliant where the issue is regulatory rather than operational. This could also lead to serious difficulties in accessing EMFAF support.

The current functioning of the CATCH system is highly problematic, with serious technical shortcomings that are already disrupting operations across the supply chains and increasing costs for all operators, including through significant rises in service fees announced by customs agents and intermediaries.

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<sup>1</sup> <https://data.consilium.europa.eu/doc/document/ST-5587-2026-INIT/en/pdf>

The current approach of CATCH IT shifts the administrative burden disproportionately onto EU importers where third-country authorities and exporters are not required, or not yet able, to use CATCH in a consistent manner. This is contrary to the objective of reducing administrative burden and ensuring that obligations rest, as far as possible, with the actor best placed to provide and validate the information at source.

We also flag organisational and accountability issues linked to the completion of catch certificates, including situations where producer organisations, exporters or other intermediaries may complete certificates on behalf of skippers. Clear, harmonised rules on responsibilities, controls and liability are needed to avoid inconsistent practices, legal uncertainty, and avoidable disputes during controls.

The additional steps and duplicative checks currently required translate into a measurable increase in processing time per consignment and per certificate, across operators and competent authorities. This is a structural impact linked to shortfalls in the system design. The system was introduced while key functionalities are not yet finalised.

We therefore strongly supports the requests formulated by the Member States and calls on the Commission to take swift corrective action by:

- Submitting a proposal to amend Article 14(3) of Regulation (EU) 2023/2842 so that, while maintaining the obligation to record catches from zero kilograms, deviations in estimated quantities below 100 kg do not constitute non-compliance;
- adopting a delegated act amending Annex IV so that estimation errors below 100 kg are not classified as serious infringements;
- postponing the full implementation of the CATCH system until 1 January 2027 in order to urgently address its technical, legal and operational shortcomings, ensuring full functionality, interoperability with customs authorities and third-country partners, legal certainty for operators, and adequate training and support for users. In parallel, to safeguard trade flows, allowing the coexistence of the current and digital systems until full digitalisation is achieved, while continuing to further develop and build the CATCH system throughout this year.
- confirming, through guidelines or implementing legislation, that the obligation to provide catch information by fishing operation (as referred to in Article 14(2)(g) of the Regulation) shall be considered fulfilled when such information is provided at least once per day, prior to entry into port or at the place of landing.
- postponing the application date for the digital traceability provisions under Article 58 for products falling under Chapter 03 of the combined nomenclature at the stage after first sale, and setting a revised implementation date no earlier than January 2029, to ensure legal clarity, interoperability, and full preparedness across the supply chain, including aquaculture operators. For this purpose, Article 67, Number 1-10 of Commission Implementing Regulation 404/2011,

shall remain active until a dedicated delegated act pertaining to the subject in matter enters into force.

We also note that the revised Article 58 extends digital traceability obligations beyond wild-capture products to aquaculture products. For several aquaculture supply chains, the specific control objective and added value of these new requirements are not yet sufficiently clear. This creates uncertainty for competent authorities and operators, without a demonstrated risk-based justification.

These targeted and pragmatic adjustments are essential to ensure that fisheries control rules remain enforceable, credible and aligned with their core objectives, without undermining safety at sea or the economic viability of EU operators. In this regard, EU flag state monitoring centres must have the technical capacity, resources and harmonised procedures to process the significantly increased volume of data generated by new reporting obligations before their full implementation. Operators must not bear the consequences—financial or administrative—of public authorities' inability to comply with rules they have themselves adopted, nor be penalised during controls for failures that are beyond their responsibility.

As recognised in the Commission's *Competitiveness Compass for the EU*, regulatory burden has become a major brake on competitiveness, and the fisheries and aquaculture sectors are no exception. EU legislation must therefore be proportionate, coherent and workable in practice.

We stand ready to contribute constructively to this process and to work with the Commission and Member States towards a balanced and workable implementation of the Fisheries Control Regulation.

Yours sincerely,



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President of Seafood Europe



Javier Garat  
President of Europêche



Elli Tsiforou  
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