



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/B4/DK

Dear Ms Bermudez, dear Mr Lopez,

Thank you for the joint Market Advisory Council (MAC) and Long-Distance Advisory Council (LDAC) advice of 1 July 2026 with regards to addressing risks in global squid fisheries by strengthening EU import controls and transparency.

As you point out, unregulated squid fishing in the Southwest Atlantic is predominantly conducted by the Chinese long-distance fleet in the absence of a competent regional fisheries management organisation. It raises important issues of sustainability of fisheries products coming to the EU market, the level playing field for EU operators and the need for international cooperation in line with the precautionary approach which are also topics you have raised in the recommendations.

EU market, imports and IUU regulation (recommendations a, b, d and e)

From the perspective of a key market state for the unregulated squid catches in subject, the EU implements the **EU catch certification scheme** to prevent products from illegal fishing coming to the EU market. The scheme has been reinforced with additional traceability requirements and became digital through **CATCH** as of 10 January 2026, thus strengthening and harmonising import controls of fishery products by EU Member States and establishing EU-wide risk assessment criteria. The Commission continues to monitor the implementation of the catch certification scheme by Member States and will not hesitate to apply infringement procedures in cases of repeated failed implementation. The Commission will also continue to use the **biennial reports** from Member States to assess the implementation of the **IUU Regulation**.

While we agree that the IUU Regulation contains one of the most advanced import control systems in the world, we would also like to remind that the scope of the IUU Regulation remains focused on combatting IUU fishing. This also implies that environmental, labour and human rights abuses are not part of the import controls

Ms Yobana Bermudez
Chair of the Market Advisory Council
yobana.bermudez@conxemar.com

Mr Ivan Lopez
Chair of the Long Distance Fisheries Council
ivan.lopez@pesqueraancora.com

conducted in the context of the IUU Regulation. They are subject to surveillance by other competent authorities.

The EU market depends on imports of fisheries and seafood products, and the sustainability of fisheries and aquaculture products imported into the EU is an increasing concern. We recall here the latest developments in the EU toolkit that will help us ensure the necessary control and scrutiny in the abovementioned policy areas. For example, we are confident that the Forced Labour Single Portal launched last June, which brings together the first tools to support the **Forced Labour Regulation**, is a major milestone towards eliminating forced labour from our supply chains. The reiterated deadline of 14 December 2027, by which no product made with forced labour may be sold in or exported from the EU market, demonstrates to the world our clear ambition. Human rights are not for sale.

In parallel, we are also in the process of finalising a back-to-back evaluation and impact assessment on the possible introduction of **sustainability criteria into the Autonomous Tariff Quota (ATQ)** regime, which is planned for the first half of 2027. This is another step in strengthening the sustainability of our imported aquatic food products.

At the multilateral level, the EU will continue to lead in the implementation of the **WTO Agreement on Fisheries Subsidies**, which entered into force in September 2025. This includes the disciplines on unregulated high seas and IUU fishing, which, as you point out, are relevant to the subject of global squid fisheries. We also remain committed to concluding phase II of the negotiations on additional provisions relating to overcapacity and overfishing, to reach a comprehensive deal that is both meaningful and balanced.

Cooperation at the bilateral, regional and supranational level (recommendations f, g, h, i and j)

The absence of a competent regional fisheries management organisation (RFMO) in the area will represent a challenge for ascertaining the legality of the catches made by the Chinese vessels.

The Commission will nevertheless, in the framework of the High-Level Fisheries Dialogue and the IUU working group, continue to address with China, the measures they put in place as responsible flag State to monitor and control the activities of their long-distance fleet on the high seas and to guarantee the sustainability of straddling fish stocks in line with their obligations as party to UNCLOS. We will also continue advocating with China for their accession to the UN Fish Stocks Agreement (UNFSA).

I also note that in the bilateral **IUU dialogues under the IUU Regulation**, the Commission addresses not only the flag State responsibilities of a country but also all other responsibilities they should fulfil as a port State, coastal State, market State and as state of nationals. As mentioned above, policy areas falling outside the scope of the IUU Regulation are not addressed during these IUU dialogues. However, within the Commission there is close cooperation between services across policy areas such as labour rights, human rights or environmental legislation, so if the Commission services are made aware of problematic issues during the IUU dialogues, the information is passed to the right services.

The EU supports the sound management of the squid resource in all oceans. In the **RFMOs** managing squid fisheries, the EU is promoting the establishment of a management framework based on science and with improved monitoring of the fleet engaged in the fisheries.

The **SPRFMO** management framework for squid is still being expanded, but the management of the jumbo flying squid stock in SPRFMO is already the most advanced of any RFMO's system. The dedicated CMM on the management of jumbo flying squid was adopted in 2020 on a proposal from the EU and further progress achieved in subsequent years is also largely due to this early effort of the EU. The measure includes a capacity limit, which was reduced further this year.

Besides the capacity limit, the EU has actively advocated strengthening the monitoring of transshipment at sea, particularly important for the jigging fleet, and enhanced data collection mechanisms, with an increase in the scientific observer coverage enabled by the use of electronic monitoring. Lastly, the EU has repeatedly insisted on the need to accelerate and complete the work on a stock assessment for jumbo flying squid, which would greatly contribute to a better management of the resource.

The EU will remain engaged in the future work regarding the management of squid in the SPRFMO, and in the implementation of the recommendations of the second performance review to ensure the long-term sustainability of the stock.

While the EU's membership in **NPFC** is recent, the EU has been supportive of an improvement of the management framework of squid guided by science.

Given the lack of scientific assessments and the high levels of fishing effort in the area, the European Union has consistently supported the establishment of an **RFMO in the South West Atlantic**. As EU vessels participate in the fisheries, the EU has a particular interest in ensuring that the resources are managed sustainably. The European Commission considers that an RFMO would provide the appropriate multilateral framework to improve scientific cooperation, ensure effective conservation and management measures, strengthen monitoring, control and surveillance, and address the risks associated with uncontrolled fishing activities. While we remain fully committed to participating constructively in potential discussions, progress will depend on the readiness of all relevant States, including coastal States, to engage actively and in good faith in the process.

In the international cooperation context, we can inform that the EU position for **FAO COFI 37** addresses squid fisheries in two places. First of all, under the agenda item dedicated to the follow-up of the COFI sub-committee on fisheries management:

“The EU invites FAO to facilitate harmonised data collection and stock assessment methodologies, including for regions and species not covered by RFMOs, and particularly for high-seas squid stocks and other data-limited fisheries. In this respect, the EU is favourable to convening a time-bound expert group on high seas squid stocks in the South-West Atlantic to address data gaps and propose sustainable management measures.”

Secondly, under the agenda item on IUU fishing:

“(...) We specifically invite FAO to address unregulated high-seas squid fisheries in the South-West Atlantic through a time-bound scientific expert group to close data gaps and possibly propose science-based measures.”

Data exchange and research (recommendations c and k)

In relation to **fisheries data exchange**, EU fishing vessels, and third country vessels fishing in EU waters, must conform to the requirements of Regulation (EC) 1224/2009 and Implementing Regulation (EU) 2025/2196 concerning digital reporting of fishing activities from catch to landing for activities taking place in EU waters or by EU vessels. Further requirements of digital reporting concern the first sales and transport of fisheries products sold or transported within the EU or landed by EU vessels to third countries.

EU Member States have the obligation to crosscheck and verify these data according to the specifics in Regulation (EC) 1224/2009 and Implementing Regulation (EU) 2025/2196. Furthermore, a Member State shares these data with the Commission and all relevant Member States. The EU mandates the use of the UN/CEFACT FLUX standard in the exchange of these data and has developed detailed implementation guidance. The EU data exchange requirements mandate nearly all the Key Data Elements of the Global Dialogue, except for information on standardisation policies utilised in different parts of the supply chain. In addition, Regulation (EU) No 1379/2013 mandates that labelling for consumers must indicate the commercial and scientific name of the fish species, the production method; where the product was caught or farmed and the type of fishing gear used.

The EU promotes digital reporting of fishing activities, using the UN/FLUX standard, both in RFMOs and in its bilateral and multilateral fisheries agreements.

As regards research, in January 2024, the Commission designated an EU Reference Centre for animal welfare focusing on the **welfare of aquatic animals** through Commission Implementing Decision 2024/266. The designation of the Centre on aquatic animals is a very important step to fulfil the gaps in scientific and technical knowledge regarding aquatic animals. The Centre, among its tasks, has the responsibility of supporting horizontal activities of the Commission and of the Member States in meeting welfare requirements for aquatic animals. The Centre will contribute to harmonised official controls in the field of aquatic animal welfare. The Centre's activities focus on aquatic animals farmed in the EU, so cephalopods have not been identified as a priority in the current work period.

Nonetheless, DG MARE supports the work of the reference centre and their cooperation with scientific research that is currently undertaken by the **International Council for the Exploration of the Sea (ICES)'s Working Group on Aquatic Animal Welfare (WGAAW)** in line with EU policy to move towards an ecosystem-based fisheries management approach. This mandate expands beyond traditional stock counts to explicitly evaluate the ethical, behavioural, and biological health of marine populations. ICES representatives joined the EFARO Working Group on Welfare in Aquaculture and Fisheries in 2025 and the findings of this group will be now followed by ICES WGAAW. The aim of this working group is to ensure the basis for providing evidence and advice to the Commission and national governments on coherent and harmonized approaches to aquatic animal welfare in the marine environment, with relevance to aquaculture, fisheries and scientific use.

I am looking forward to our continued fruitful cooperation. Should you have further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu.

Yours sincerely,

Charlina VITCHEVA

c.c.: Pedro Reis Santos secretary@marketac.eu; Alexandre Rodriguez alexandre.rodriguez@ldac.eu