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## Water-tight?

Assessing the effectiveness of EU controls to prevent illegal seafood imports

EXECUTIVE SUMMARY – NOVEMBER 2022



EU IUU FISHING COALITION



# Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports

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22 March 2023

# European Court of Auditors

*“The EU set up a catch certification scheme in 2008 to guarantee the legality of imported fishery products. However, ensuring the legality of a product does not guarantee that it is sustainably sourced. We found that the scheme had improved traceability and reinforced import control. **Nonetheless, differences in the scope and quality of checks in Member States risk undermining the scheme’s effectiveness. The lack of digitalisation of the scheme reduces efficiency and increases the risk of fraud.**”*

Special report 20/2022: EU action to combat illegal fishing – Control systems in place but weakened by uneven checks and sanctions by Member States



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[IUUwatch.eu](http://IUUwatch.eu)

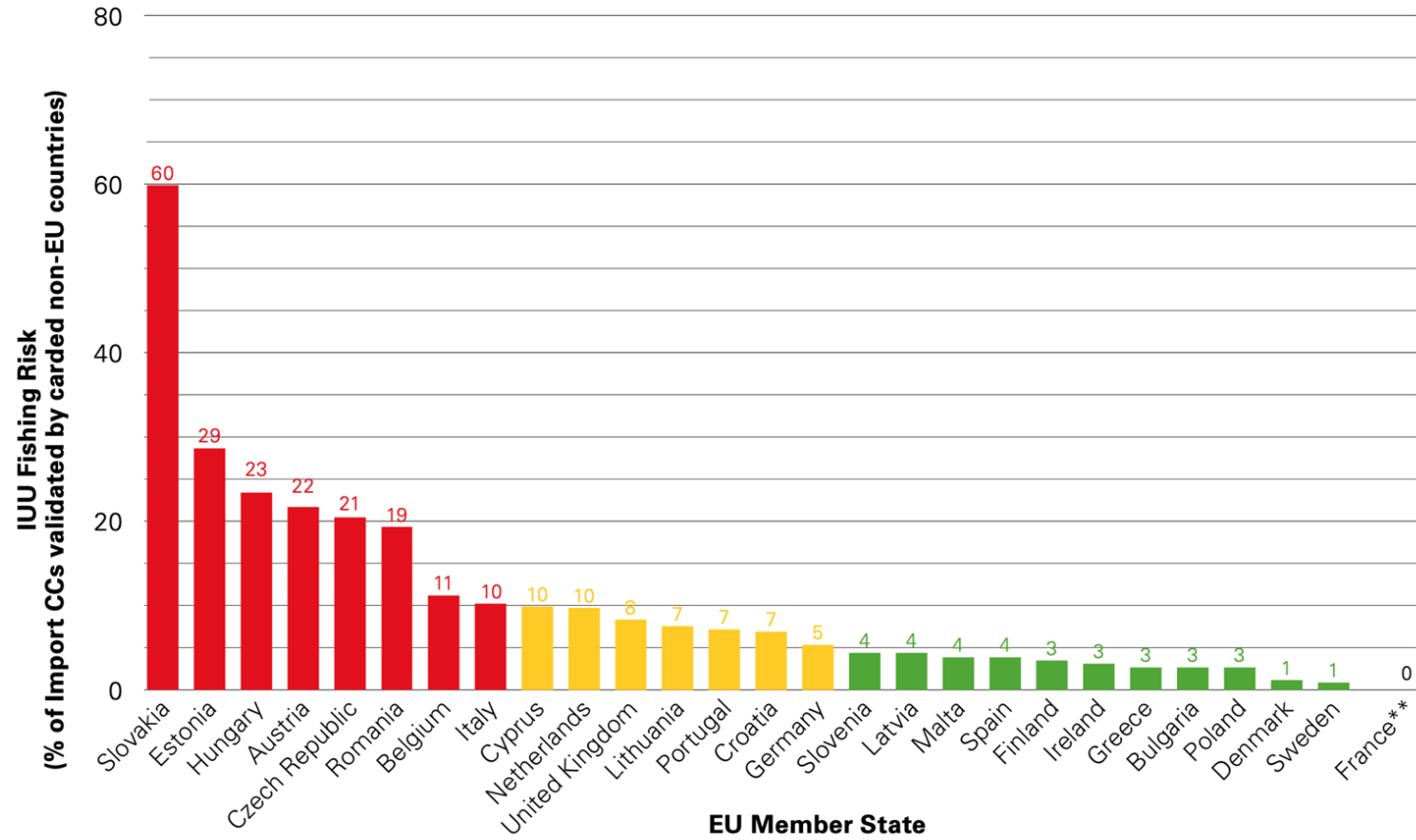
# KEY FINDINGS



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**Figure 3 – Percentage of import catch certificates validated by carded non-EU countries (IUU Risk) over the 2018/19 reporting period\***



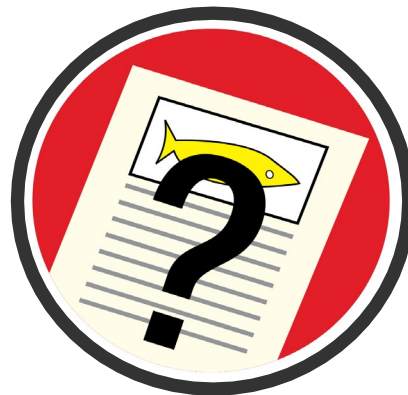
\* **Red = Higher risk** (>10% of catch certificates validated by carded non-EU countries), **Yellow = Medium risk** (between 5-10%), **Green = Low risk** (<5%).

\*\* No flag State information was provided by France in the 2018/19 biennial report.





**ROUTINE DOCUMENTARY  
CHECKS OF ALL IMPORT  
CCS RECEIVED**



**APPLICATION OF A RISK-  
BASED APPROACH TO  
ASSESSING CCS**



**VERIFICATION OF CCS TO  
ASCERTAIN COMPLIANCE  
OF IMPORTS**



**PHYSICAL INSPECTIONS  
OF CONSIGNMENTS**



**REJECTION OF  
CONSIGNMENTS IN THE CASE  
OF NON-COMPLIANCE**



**BIENNIAL REPORTING ON  
ACTIVITIES UNDER THE EU  
IUU REGULATION**



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# Routine documentary checks of all import CCs received



## Disparities between the documentary checks undertaken by MS:

- proportion of CCs that are subject to checks
- procedures involved

There are also sometimes issues with data reporting.



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# Application of a risk-based approach to assessing CCs



Figure 1 – Map showing Member States applications of a risk-based approach for assessing catch certificates\*

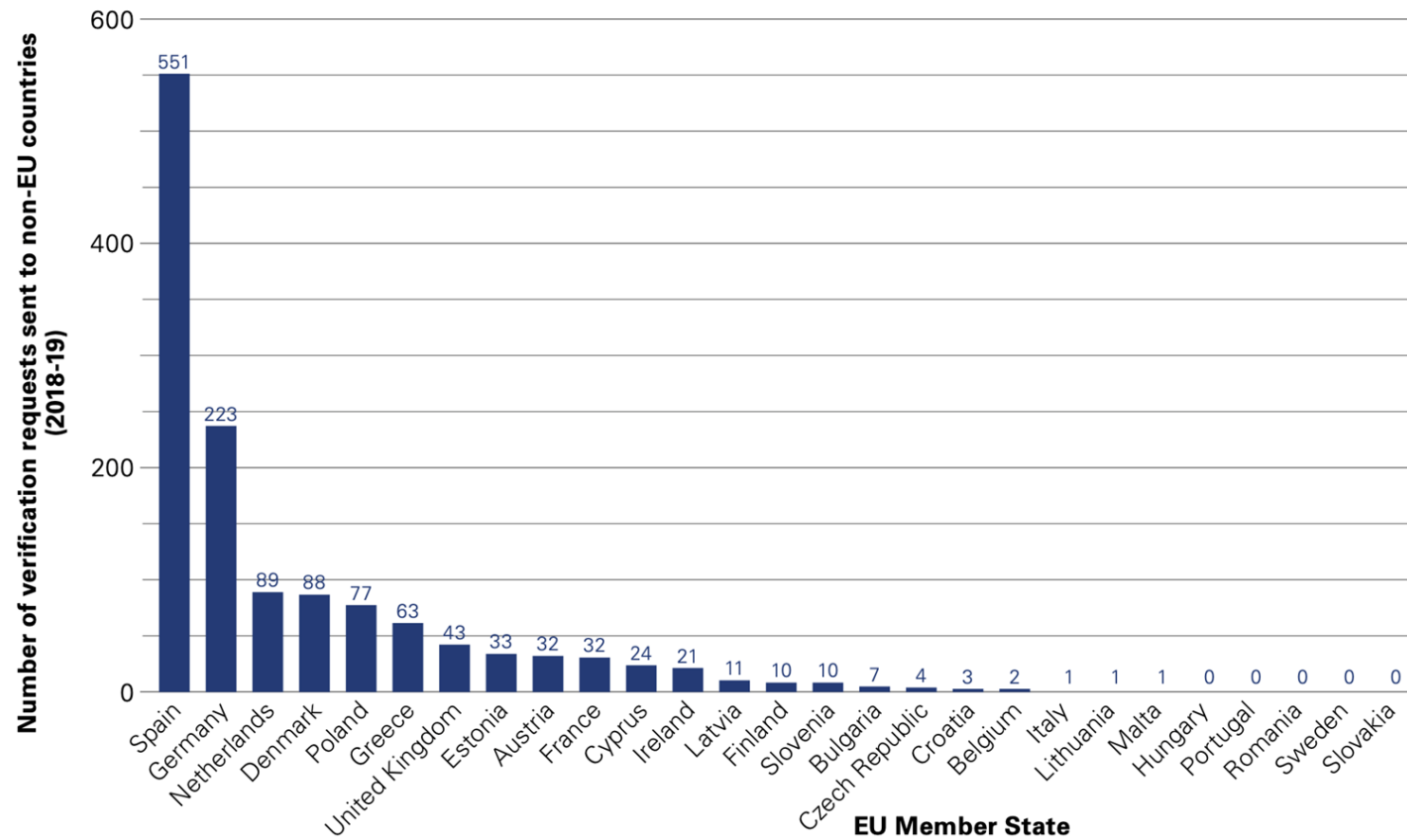


- KEY:**
- No risk-based approach
  - National risk criteria
  - No risk-based approach but 100% of CCs checked
  - EU-level risk criteria
  - No information provided
  - EFCA common methodology
  - EU-level criteria, national criteria, and 100% of CCs checked

# Verification of CCs to ascertain compliance of imports



Figure 4 – Total number of verification requests sent by Member States to non-EU countries (2018/19)





# Physical inspections of consignments: direct landings



**Table 4 – Annual statistics on the percentage of direct landings operations in Member State ports subject to inspection for the 2018/19 reporting period**

Member State	% of direct landing operations inspected (2018)	% of direct landing operations inspected (2019)
Spain	91.0%	93.0%
United Kingdom	52.3%	64.0%
Ireland	27.7%	20.0%
Latvia	18.2%	22.2%
France	14.68%	17.0%
Lithuania	5.0%	13.0%
Netherlands	5.7%	7.4%
Sweden	5.7%	5.8%
Denmark	5.1%	4.0%
Poland	4.4%	2.5%

Figures in **red** highlight occasions where Member States failed to inspect 5% of direct landing operations in ports as required under the EU IUU Regulation (Article 9).

# Physical inspections of consignments: freight consignments



In the 2018/19 biennial reports, 7 MS reported that they did not carry out physical inspections of import consignments.

- **Belgium**
- **Czech Republic**
- **Finland**
- **Greece**
- **Hungary**
- **Latvia**
- **Romania**

Between the other Member States, physical inspections of import consignments vary in terms of

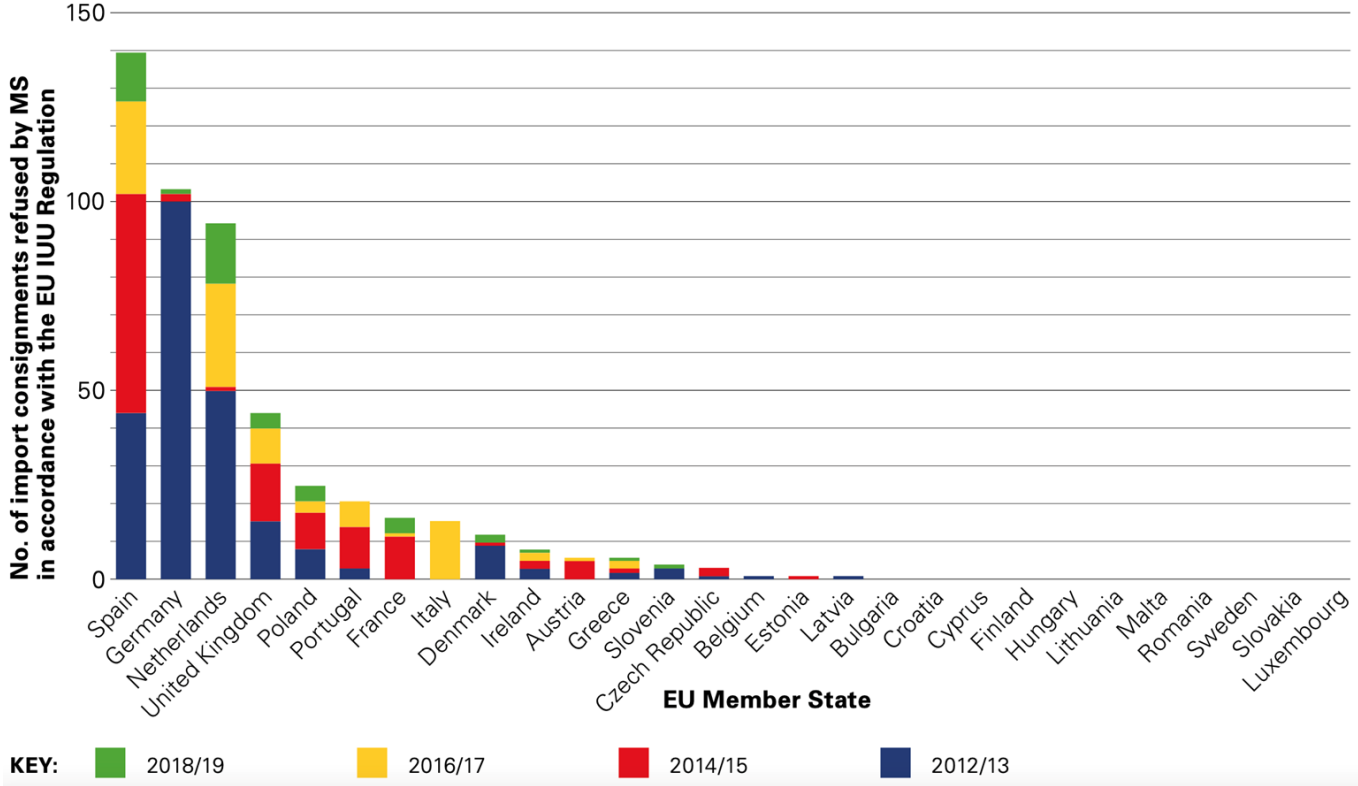
- How consignments are selected for inspection
- The competent authorities responsible for carrying out inspections
- The quantity of inspections



# Rejection of consignments in the cases of non-compliance



Figure 6 – Number of import consignments refused by Member States in accordance with the EU IUU Regulation (2012-2019)



- Over the 2018/19 period, only 47 import consignments were rejected by Member States.

# Biennial reporting to the Commission on activities under the EU IUU Regulation



- Certain sections within the biennial reports for the 2016/17 and 2018/19 reporting periods provided by the European Commission in response to an 'access to information' request were **redacted by some MS**.
- A number of identified improvements could be made to the reporting template, as some non-specific questions result in a **lack of consistent responses from MS and differences in the level of detail provided**.



# SUGGESTED RECOMMENDATIONS



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# For the European Commission:

- Create and ensures application of standardised risk analysis criteria
- Establish benchmarks for the verification of high-risk catch certificates and inspection of consignments
- Make the biennial reports publicly available
- Hold accountable Member States that fail to uphold key requirements
- Encourage the swift inclusion of comprehensive risk criteria and data cross-checks in CATCH IT system
- Continue and expand EFCA trainings





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**THANK YOU**

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