

LDAC-Working Group 5 (Brussels, October 2025)

- Preparation of point 6.2 of the agenda:

6.2- Overview of EU IUU carding process in relation to dialogues with non-EU countries: feedback by MARE on questions from members.

Short general updates¹: Senegal, Thailand, Ecuador, Panamá, Comoros, Indonesia, Suriname, Liberia, Philippines, Cameroon, Ghana, Sierra Leone, Corea del Sur, China y Brasil

- Africa:
 - Cameroon
 - Comoros
 - Ghana
 - Liberia
 - Senegal
 - Sierra Leone
- South America:
 - Ecuador
 - Panamá
 - Suriname
 - Brazil
- Southeast Asia:
 - Indonesia
 - Philippines
 - Thailand
- East Asia:
 - South Korea
 - China

Specific questions:

- **Senegal:** On 2 October, the Commission published a [notice](#) to importers regarding the import of fish products from Senegal into the EU. It raises doubts about Senegal's compliance with EU GSP rules of origin for fish products exported under preferential tariffs. Following a 2022 monitoring visit and subsequent enquiries, Senegal failed to demonstrate that its fish products meet GSP origin requirements. That seems to echo the traceability issues in Senegal that you had previously highlighted in LDAC, as well as concerns that LDAC members raised. Are the Senegalese authorities now more inclined to cooperate with the Commission to resolve those issues? What are the next steps of the dialogue?
- **Other IUU-related matters:**
 - **Nationals/beneficial ownership:** Beneficial ownership structures are often complex and opaque. Therefore, the enforcement of Article 39 (1)-(3), Article 40(1), and the new Article 38(10) (following the revision of the fisheries controls framework) of the IUU Regulation, depends on Member States' ability to identify which of their nationals hold beneficial interests in vessels, whether EU- or non-EU-flagged. Can the Commission explain how these articles are supposed to be enforceable without Member States collecting beneficial ownership data? Can the Commission indicate what measures it is taking to ensure that such data is collected, verified and exchanged effectively across the EU?

¹ If new information to report since last WG5 meeting