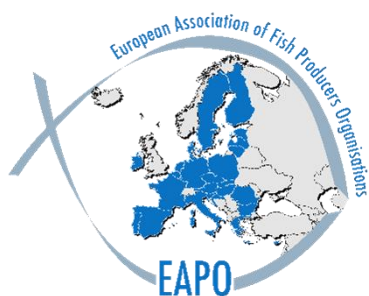


European Association of Fish Producers Organisations

Association Européenne des Organisations de Producteurs dans le secteur de la pêche



EAPO / AEOP

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Letter by e-mail attachment to:

To: Mr. Costas KADIS, European Commissioner for Fisheries and Oceans
(cab-kadis-contact@ec.europa.eu)

EAPO24-68

Oostende, 13 December 2024

EU Transparency Register number: 46491656228-65

Dear Commissioner Kadis,

Subject: Implementation of the “Control Regulation”, Council Regulation (EC) No 1224/2009

I am addressing you in my capacity as President of the European Association of Fish Producers Organisations (EAPO), representing 30 Producers Organisations from 12 European Member States. On behalf of the membership of EAPO, I would like to express our concerns about the implementation of the “Control Regulation”, Council Regulation (EC) No 1224/2009, through several implementing and delegated acts amending Regulation (EU) 2023/2842 and expected to enter into force in January 2026.

EAPO members have expressed significant concerns regarding various proposals contained in these draft acts that amend critical elements of the Control Regulation, rendering them unworkable. These include the weighing of fishery products, the sampling of unsorted pelagic landings, and the increased frequency of VMS monitoring from every 2 hours to every 15 minutes. Additionally, there are issues with the newly proposed provisions relating to fishing authorizations and gear definitions.

These proposed measures are not only perplexing but also threaten to further complicate an already overly prescriptive regulatory framework, without offering any tangible improvements to fisheries control. It is our understanding that certain provisions were explicitly rejected during the negotiation of Regulation 2023/2842 by the Member States and Parliament, and are outside the scope of the implementing authority granted to the Commission in the Control Regulation.

The current measures fail to adequately address the disparities among member states regarding fishing practices and control implementation, rendering them ineffective for harmonizing fisheries control measures across the EU. The introduction of these new measures is expected to significantly increase the control workload for national authorities, potentially undermining the feasibility of implementing an effective control and sampling plan. Furthermore, these measures create an uneven playing field with vessels from third countries which are subject to less rigorous enforcement regimes, heightening the risk of unfair competition.


Additionally, I would like to point out that not only is the content concerning, but the process of developing these acts is questionable. The current approach, which involves implementing and delegated acts, is rushed leaving little time for proper analysis of the impacts. The opportunity for comprehensive assessment by member states has been limited while there has been no meaningful engagement with stakeholders who will be impacted by this legislation. Furthermore, the extremely limited review period of only four working days undermines the process's credibility and risks overlooking critical practical aspects essential for successful implementation.

EAPO emphasizes the need for the European Commission to adopt a more comprehensive and inclusive approach to developing these proposals, developed through meaningful engagement with stakeholders and Member States.

EAPO is more than willing to engage in a constructive dialogue with the Commission to guarantee that this vital legislation genuinely facilitates the implementation of the Control Regulation, while not creating impractical rules that the industry finds impossible to comply with. I therefore wish to recall the importance of a process oriented in a more inclusive and forward-thinking approach, which will foster fruitful collaboration.

Yours sincerely,

Esben Sverdrup-Jensen,

A handwritten signature in black ink, appearing to read 'ES Sverdrup-Jensen', written in a cursive style.

President of EAPO