

Tuesday, 17 February 2026

Re: Staying your course on combating IUU fishing by delivering digital & effective fisheries control

Dear Commissioner Kadis,

We welcome your recent statement that EU Regulation 2023/2842, adopted by the European Parliament and Member States just over 2 years ago, remains a major political achievement.ⁱ The European Court of Auditors also deemed this reform necessary to digitalise paper-based systems, to ensure dissuasive sanctions and to prevent “*control shopping*”, where operators exploit the weakest link.ⁱⁱ This is no time to risk its delay or weakening.

We urge you to stick to your commitments to focus on the “*gradual but timely and full implementation of the revised fisheries control system*”ⁱⁱⁱ including CATCH and the Fisheries Control Regulation and so deliver on Europe’s zero-tolerance to illegal, unreported and unregulated (IUU) fishing.

Strong EU rules to detect and deter IUU fishing are indispensable. Not just for protecting Europe’s fish populations from unmonitored quota uptake, but for credibly asking third countries to do more to fight illegal and unsustainable fishing and avoiding illegal seafood entering the EU market.^{iv} The loopholes that legalised misreporting contributed to stock collapses in the Baltic Sea^v and proposals to introduce similar loopholes in catch reporting raised questions from the EU’s partners, including the UK.^{vi}

At the UN Oceans Conference in Nice last June, President von der Leyen stressed that the EU can “*crack down on this illegal fishing that destroys our ecosystems*” with the digital tools it has, to level the playing field and to “*produce at least half of our marine food right here in Europe*”.^{vii} Accordingly, Member States should not delay, but deliver on what they promised to do, and what advisory councils jointly demanded.^{viii}

Concretely **the undersigned urge you - as the “Guardian of the Treaties” - to continue to:**

- **remind Member States of their basic obligations**, with enforcement actions if needed, including
 - to take effective measures to uphold the community system against IUU fishing,^{ix} including by establishing dissuasive penalties;^x and
 - to properly monitor the uptake of quotas and contribute to the Common Fisheries Policy (CFP) objectives by ensuring they have accurate and comprehensive information and data on fishing opportunities;^{xi} and
 - to ensure adequate financial, human and technical resources for control of activities in the scope of the CFP.^{xii}
- **encourage Member States to expedite use of available EU funding instruments**, including the European Maritime, Fisheries and Aquaculture Fund, to support operators and authorities in preparing to use the digital tools that they mandated in EU Regulation 2023/2842; and
- **address, at technical level, any challenges** users of these digital tools face while remaining firmly within the boundaries of the applicable legal framework.

Commissioner, your leadership sends a clear signal. We encourage you to stay on this course. We stand ready to support the full and effective implementation of a control system that Europe's fisheries, coastal communities and citizens urgently need.

Respectfully,

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CEO / Founder
Environmental Justice Foundation



Ariel Brunner
Director
BirdLife Europe and Central Asia



Anaïs Berthier
Head of Brussels and Associate
Director for Europe
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Vera Coelho
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Ester Asin
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ⁱ European Commission, *Speech by Commissioner Kadis at the Agrifish Council: Difficulties in the Implementation of the Control Regulation and the Use of CATCH*, Brussels, 26 January 2026. Available at: https://ec.europa.eu/commission/presscorner/detail/en/speech_26_226

ⁱⁱ The Court of Auditors noted misreporting as a persistent, major issue in EU fisheries, citing that 34% of all serious infringements (between 2015-2019) involved "Failure to fulfil obligations to record and report catch data". / European Court of Auditors, *Illegal Fishing in the EU: Controls Are Weak and Sanctions Ineffective*, Special Report 20/2022, 2022. European Commission, Answer to Parliamentary Question E-10-2025-000104, 2025. Available at: https://www.eca.europa.eu/Lists/ECADocuments/SR22_20/SR_Illegal_fishing_EN.pdf

ⁱⁱⁱ European Commission, Written Questions and Answers for Commissioner-Designate Kadis' Hearing (2025), *Kadis Written Questions and Answers*, available at: https://hearings.elections.europa.eu/documents/kadis/kadis_writtenquestionsandanswers_en.pdf

^{iv} You have indicated on behalf of the European Commission that "any substantive relaxation" by Thailand of its IUU fishing regime would "not be acceptable". Entertaining similar relaxations risks undermining the EU's position in its (trade) negotiations. / European Commission, *Answer to Parliamentary Question E-10-2025-000104* (2025), European Parliament Doceo database, available at: https://www.europarl.europa.eu/doceo/document/E-10-2025-000104-ASW_EN.html

^v Arhur Neslen, "Loophole in quotas allows overfishing of endangered species, EU papers show," *The Guardian*, 16 March 2023. Available at: <https://www.theguardian.com/environment/2023/mar/16/loophole-quotas-overfishing-endangered-species-eu-papers>

^{vi} The UK minister noted that these proposals would "elevate the risk and magnitude of underreporting and overfishing with no risk of sanction for the operator, even though on-board technology now allows more accurate estimation of quantities and catch composition". / House of Commons European Scrutiny Committee, Sixth Report of Session 2021–22 (HC 121-vi, 27 July 2021). Available at: <https://committees.parliament.uk/publications/6978/documents/72822/default>

^{vii} European Commission, *Speech by President von der Leyen at the EU Side Event on the Ocean Pact*, 9 June 2025. Available at: https://ec.europa.eu/commission/presscorner/detail/da/speech_25_1457

^{viii} Long Distance Advisory Council (LDAC) and Market Advisory Council (MAC), *Joint LDAC-MAC Advice: Urgent Need for Effective Implementation of EU Import Control Rules across Member States*, Madrid/Brussels, 27 June 2025. Available at: <https://marketac.eu/wp-content/uploads/2025/06/EN-LDAC-MAC-Advice-EU-import-control-rules-27.06.2025.pdf>

^{ix} Council Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing (IUU Regulation), OJ 2008 L286/1, Article 1. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32008R1005>

^x Regulation (EU) No 1380/2013 on the Common Fisheries Policy (CFP Regulation), OJ 2013 L354/22, Article 36(3). Available at: <https://eur-lex.europa.eu/eli/reg/2013/1380/oj/eng>

^{xi} Case C-564/20, *Minister for Agriculture and Food and the Marine and Sea Fisheries Protection Authority*, Judgment of 10 February 2022, para 41. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62020CJ0564>

^{xii} Council Regulation (EC) No 1224/2009 establishing a Community control system for ensuring compliance with the rules of the Common Fisheries Policy (Fisheries Control Regulation), OJ 2009 L343/1, Article 5(3). Available at: <https://eur-lex.europa.eu/eli/reg/2009/1224/oj>