

Beyond CATCH: Why EU import controls still fail to keep illegal seafood out of the market

Summary

The European Union (EU) is the world's largest seafood importing market,¹ and given that one fifth of seafood catches come from illegal, unreported, and unregulated (IUU) fishing,² it is likely that products tainted by IUU fishing and its associated crimes, such as forced labour, are entering the EU. The EU may have the world's most comprehensive import control scheme on paper (the EU's IUU Regulation),³ but this briefing demonstrates that weak and uneven implementation of import controls by Member States is leaving room for products of IUU fishing to enter the EU market.

In this briefing, the EU IUU Fishing Coalition analysed the implementation of EU import controls for seafood between 2020 and 2023. We found that Member States persistently fail to adequately investigate seafood

imports deemed high-risk of IUU fishing (that is, by failing to submit verification requests to non-EU authorities to check catch certificate details that accompany their seafood exports). We also found extremely low levels of import refusals across all Member States. Italy and Portugal are amongst the worst-performing countries, despite being significant seafood-importing Member States, with a considerable proportion of imports coming from non-EU flag States deemed as high-risk for IUU fishing. Such low levels of refusals clearly do not align with strict import controls.

Some Member States continue to fail to meet the legal obligation of inspecting 5% of direct landings by non-EU country vessels⁴—most concerningly the Netherlands, given the significant volume of fish and fish products landed in its ports by high-risk flag States, including Russia in 2022-2023.



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The actions of poor-performing Member States undermine the EU market and the efforts made by the European Commission and Member States who *are* implementing stronger import controls, like Spain, which inspects over 70% of all direct landings. This creates opportunities for ‘control shopping’, where bad actors exploit the easiest entry points to enter the EU market without sufficient scrutiny.

Since 2017, the EU IUU Fishing Coalition has consistently highlighted poor implementation of import controls by Member States and urged them to be held accountable for failing to enforce these key requirements of the EU IUU Regulation.^{5,6} After being in force for fifteen years, effective implementation of the EU IUU Regulation is long overdue, and though the digitisation of import controls through CATCH⁷ will improve the system, it alone cannot solve systemic control failures.

The mission letter for the new Commissioner for Fisheries and Oceans, Costas Kadiş, specifies that he should “*take action to uphold a level playing field and protect the European fisheries chain from unfair global competition, notably on seafood products*”.⁸ Ensuring full Member State implementation of the EU’s import control rules is one of the most effective means by which the European Commission can meet this objective and protect EU consumers from the risk of unknowingly consuming seafood linked to IUU fishing and its associated human rights abuses.

The European Commission, as the guardian of the treaties, has a duty to hold Member States accountable by using all tools available to it, as they have started with the recent infringement procedure launched against Portugal.⁹ Member States must strengthen their import control implementation to level the playing field for legal EU fisheries operators and prevent illegal seafood from entering the EU market.

Action needed to strengthen EU-wide import control implementation

The European Commission should:

- **Launch infringement procedures** against Member States that repeatedly fail to implement the EU IUU Regulation.
- **Encourage and streamline Member States’ biennial reporting on the implementation of the EU IUU Regulation** in order to improve data submission, better identify poor-performing Member States, and hold them to account.
- **Improve transparency** by publishing comprehensive information on Member States’ implementation of the EU IUU Regulation. This should include either full publication of the biennial reports or detailed summaries that contain essential data points.

Member States should:

- **Immediately meet the minimum 5% inspection obligation** for direct landings from non-EU vessels.
- **Increase capacity and resources** to ensure the effective implementation of import controls.
- **Apply standardised, thorough verification and inspection procedures** for higher-risk catch certificates and consignments.
- **Ensure consignments containing illegally caught products are refused** entry to the EU market.
- **Ensure comprehensive data submission in the biennial reporting** on the implementation of the EU IUU Regulation.
- **Work collaboratively with stakeholders**, such as the economic sector (EU fishing companies, retailers, traders, processors, etc.) and civil society, by stopping the practice of redacting large portions of the biennial reports requested through the access to information procedure.

Context

The EU imports 69% of its seafood, with extra-EU imports valued at approximately EUR 30.1 billion in 2023.¹⁰ It is estimated that one in five seafood products are caught by illegal, unreported, and unregulated (IUU) fishing, making it highly likely that some imported products are tainted by IUU fishing and its associated crimes, such as forced, bonded, or slave labour. Therefore, ensuring these products do not enter the EU market is essential to protect food security globally and uphold decent working conditions. Excluding and deterring IUU-caught seafood safeguards marine ecosystems, fish stocks, and the EU consumer, and also ensures EU operators' competitiveness and a level playing field. Currently, these are all undermined by unfair competition from seafood products that are caught with different environmental or social standards, or have been caught illegally.

Despite the EU's strong regulatory position, insufficient action by Member States means many catches of fleets deemed as high-risk for IUU fishing have been entering the EU market unchecked.¹¹ This includes products from yellow-carded countries (countries pre-identified or warned as non-cooperating in deterring IUU fishing by the European Commission), flag States with the worst score by the independent IUU Fishing Index (the four highest-risk include China, Russia, Yemen, and India),¹² and countries associated with various abuses or subject to wide-ranging sanctions.^{13,14,15}

From 2026, CATCH, the digitalised catch certification scheme, will be mandatory for EU importers and Member States. CATCH has the potential to improve the system's efficiency compared to the current paper-based system as it will allow immediate information

sharing and improve the risk assessments carried out in the EU. However, there are persistent challenges with import control implementation that will not be solved by the digitisation of the catch certification scheme alone, such as a lack of verification requests, physical inspections, and rejections of imports by some Member States. These have also been highlighted by two of the biggest EU fisheries advisory councils, official bodies with strong industry membership, in two separate pieces of joint advice.^{16,17}

To address these issues, the European Commission must act to tighten Member States' seafood import controls, as they have started by launching an infringement procedure against Portugal.¹⁸ Expanding this action to other under-performing Member States will be key for the new Commission to deliver on its agenda to prioritise competitiveness and sustainability. The Member States must also step up their import controls to ensure that no illegally caught seafood enters the EU, and must ensure a quick implementation of the CATCH system.

This briefing provides an updated state of play on the implementation of EU import controls from 2020–2023, including an additional analysis on data from 2012 to 2023 to investigate patterns in import refusals. This analysis is primarily based on two sets of Member State biennial reports (2020–2021 and 2022–2023) on the application of the EU IUU Regulation,¹⁹ obtained through official access to information requests and made publicly available.²⁰ We have highlighted key Member States which are amongst the highest seafood importers, and are particularly poor or good performers in implementing import controls. We then provide recommendations to the European Commission and Member States to improve implementation, focusing solely on aspects of import controls that cannot be improved by CATCH.



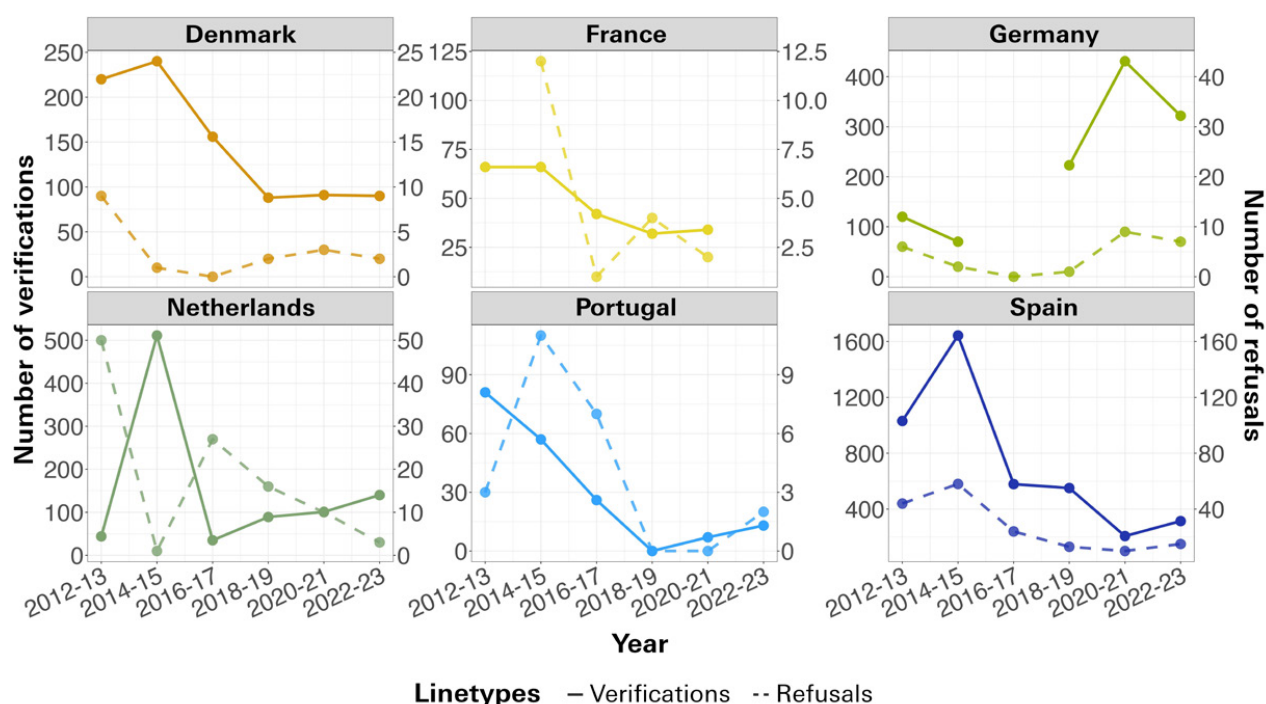
Low catch certificate verifications and refusals by Member States weaken overall EU import controls

Full and effective import controls deter the importation of seafood caught by IUU fishing. Our analysis reveals a clear, statistically significant link: the more verification requests sent, the higher the number of refusals.²¹ However, this deterrent effect by one Member State

is undermined when other Member States reduce verification efforts. As verifications on the whole have been declining by Member States in recent years,²² the rate of detecting illicit consignments and subsequently refusing them may also be lowering across the board.

An increase in seafood import verifications is linked to more refusals

The left y axis shows verifications, the right y axis shows refusals

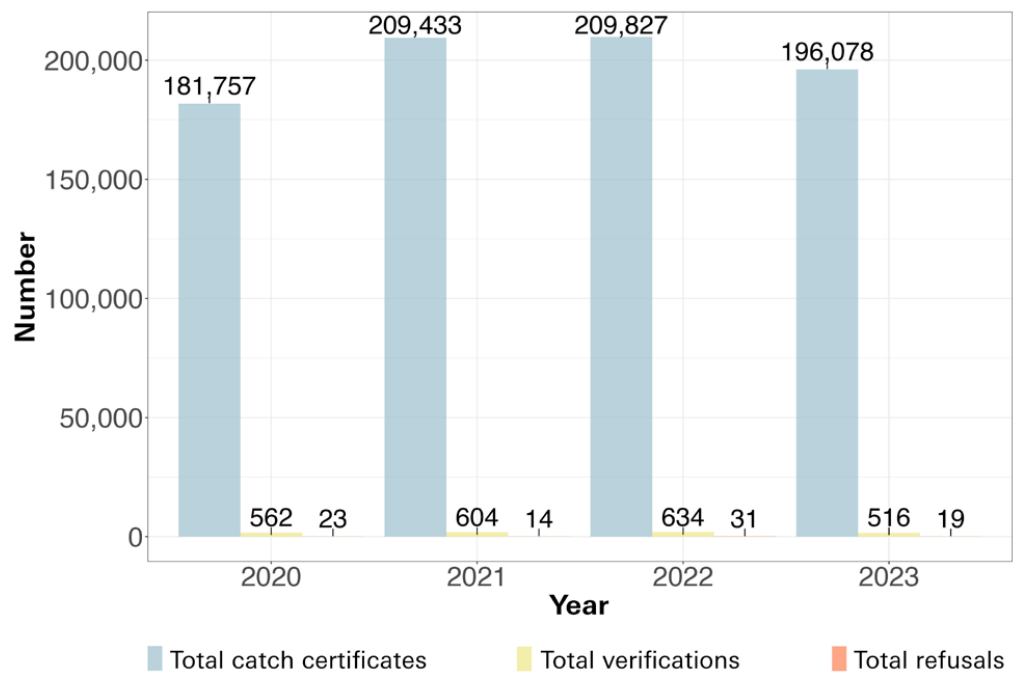


Between 2020 and 2023 across the EU, a small number of catch certificates received from non-EU countries were subject to verification requests sent to the flag state and only a few resulted in import refusals. Most Member States use a risk-analysis system to target import controls, and most screen the catch certificate to ensure all the fields are completed; however, the low number of verifications and refusals suggests that not all Member States are

applying the necessary scrutiny to imported seafood products. Between 2020 and 2023, of the 796,963 catch certificates received from non-EU countries, of which 32,733 were from yellow-carded countries, only 0.29% were verified with the flag States, and 0.01% were refused.

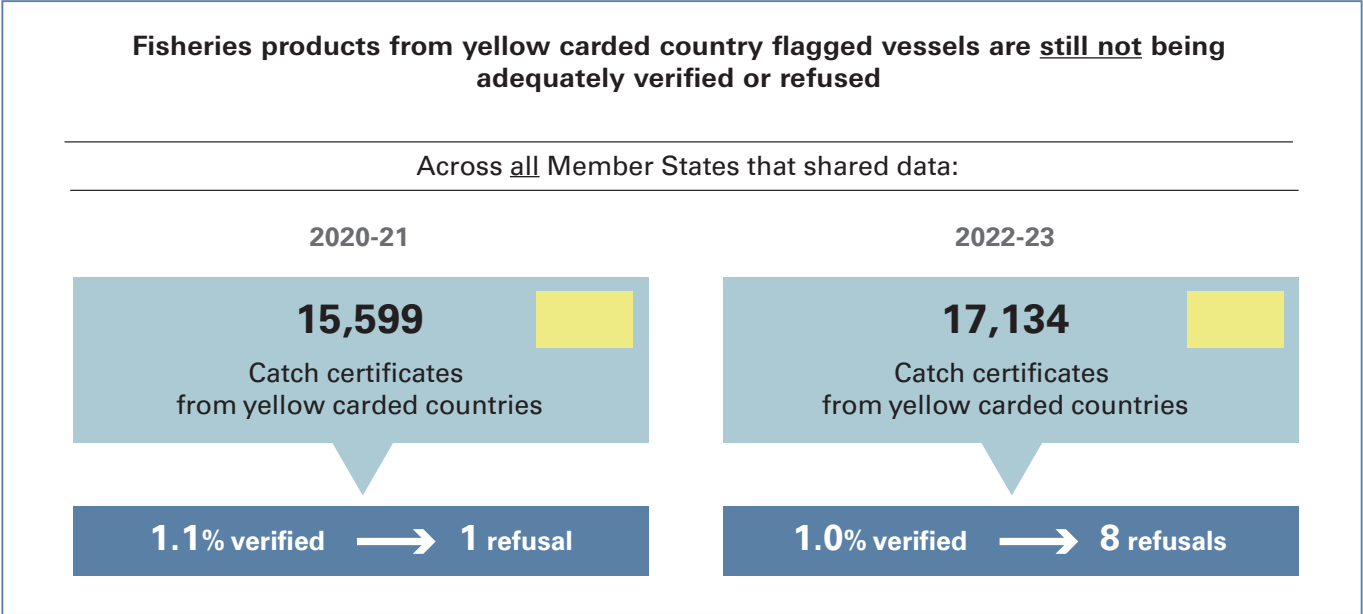
Low verification and refusal rate across all EU Member States

Verification and refusals modified to account for extreme number differences, actual values shown on bars



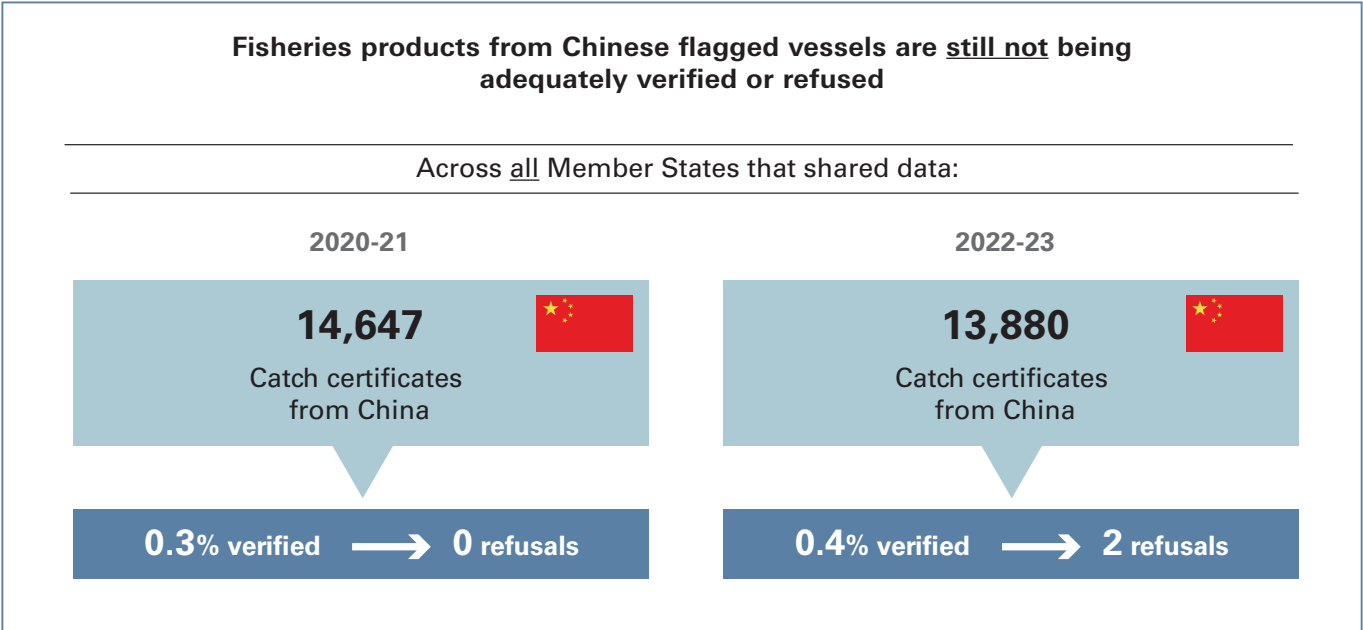
For catch certificates from vessels flagged to yellow-carded countries, verification requests have been higher at around 1%, with refusals still at a very low level. It should be noted that this increased verification rate is mainly due to Spain and Germany applying stricter controls to higher-risk imports (i.e. those from

yellow-carded countries). When Spain and Germany are excluded, only 0.4% of catch certificates from yellow-carded countries were verified in 2020-21, and 0.3% in 2022-23. Most Member States appear to overlook the higher risks of IUU fishing inherent in seafood coming from yellow-carded countries.



Furthermore, it is worth noting that imports from Chinese-flagged vessels—a fleet that has been extensively and repeatedly associated with IUU fishing, the intentional targeting of vulnerable marine wildlife, and human abuses at sea,²³ as well as ranking top

in the IUU Fishing Index²⁴—face even less scrutiny. Across all EU Member States fewer verification requests were sent to the Chinese authorities and almost zero imports from China were refused between 2020 and 2023.

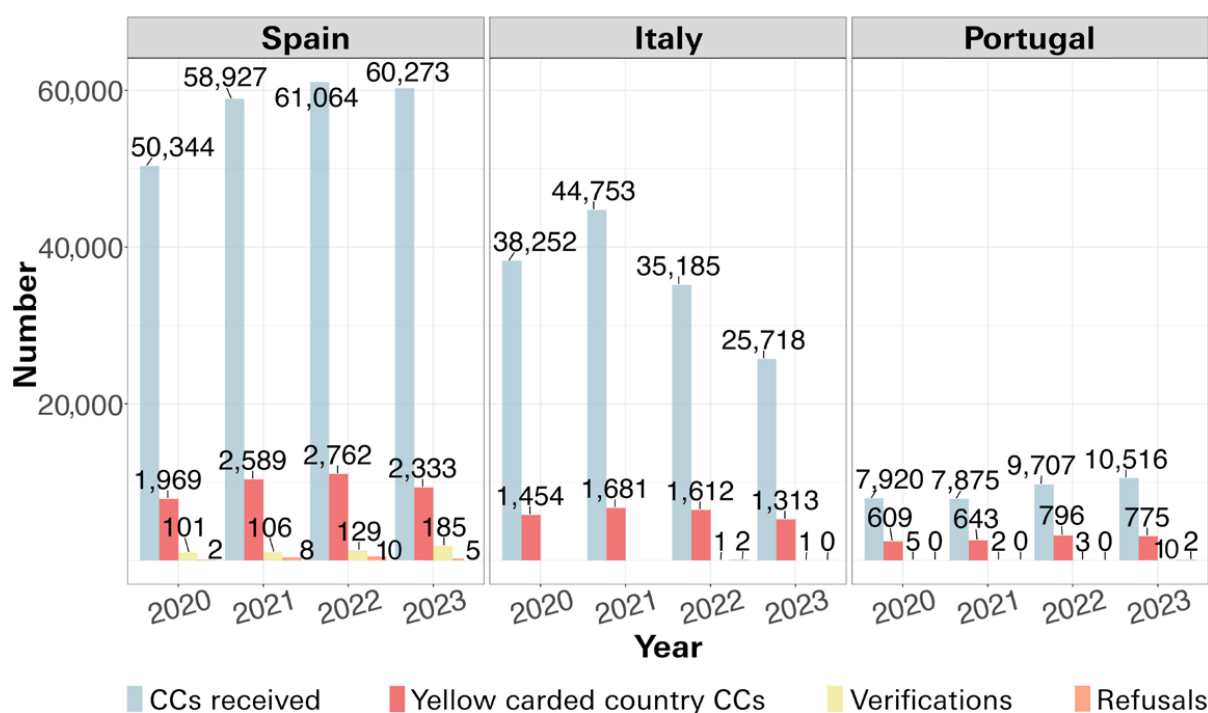


Italy and Portugal—as top importing Member States²⁵—are especially poor performers in verifying catch certificate data and refuse almost no import catch certificates. This is particularly concerning due to the number of catch certificates received from countries that have been yellow carded.²⁶

Between 2022 and 2023, Italy verified only one catch certificate each year, and refused two consignments in 2022.²⁷ Portugal verified an average of five catch certificates a year between 2020 and 2023, and refused none of these between 2020 and 2022 and only two in 2023.

Member State catch certificates (CC), verifications, and refusals

Yellow carded country CCs, verifications, and refusals modified to account for extreme number differences, actual values shown on bars



While Spain stands out as a relatively better performing Member State with a sophisticated risk assessment system,²⁸ verifications and refusals remain low in 2020-2023 compared to the total amount of catch certificates received. Spain verified on average (mean) 0.2% of catch certificates and refused 0.01% between 2020-23.

These findings raise significant concerns over the effectiveness of EU import controls, given that a seafood consignment can move freely between Member States once it has entered the EU; the EU import control system is only as strong as its weakest link. Robust and harmonised import controls must be implemented across all Member States to prevent products of IUU fishing from entering the EU market.

Multiple Member States fail to meet the minimum inspection requirement of 5% of direct landings

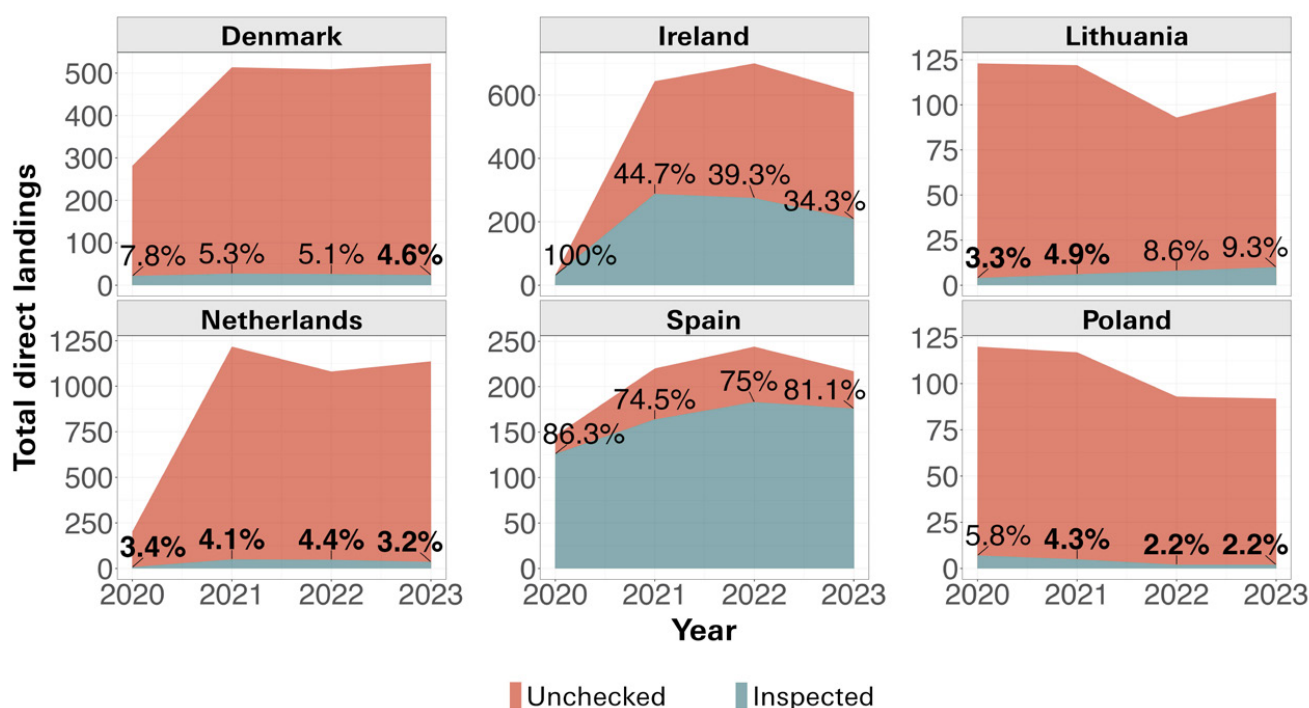
Member States are legally required to inspect at least 5% of all direct landings from non-EU countries.²⁹ Non-compliance with this legal threshold has already been observed in our previous analysis for the 2018-2019 period³⁰ and has persisted in 2020-2023 for the Netherlands, Poland, Denmark, and Lithuania.³¹

The Netherlands and Poland are particularly concerning, as they failed to inspect 5% for either all or the majority of years respectively across the 2020-

2023 period. Denmark must improve their inspections of direct landings, as this has dropped in recent years, falling below the legal 5% threshold in 2023. Whilst Lithuania was inspecting less than the 5% requirement in 2020 and 2021, it has since increased above the 5% threshold in 2022 and 2023. There is a striking difference amongst these Member States and others like Spain and Ireland, which have inspected over 70% and 30% of direct landings respectively over the same period.

Proportion of inspected direct landings vs unchecked

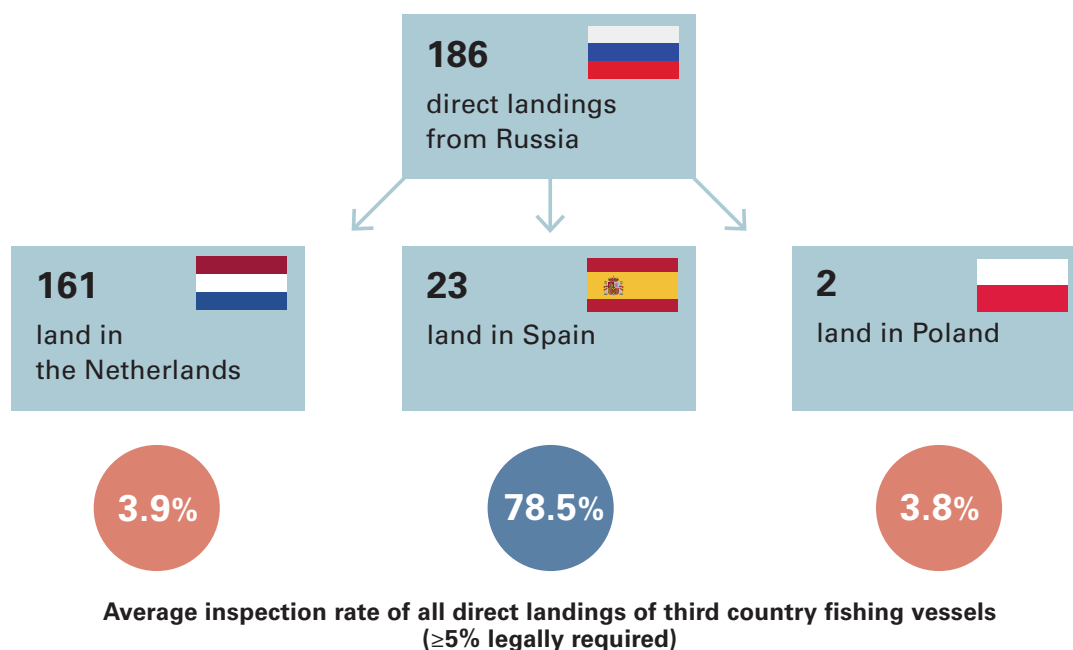
The percentage of landings inspected is labelled, those below 5% are highlighted in bold



Analysing the average inspection rates of Member States receiving Russian direct landings is particularly concerning, as Russia is ranked as the second highest flag State globally for risk of IUU fishing.³² Between

2020 and 2023, 87% of all Russian direct landings into Europe were into the Netherlands, with an average inspection rate of less than 4% for all third country fishing vessels that landed in their ports.

Disparity in physical inspections compared to Russian direct landings (2020-2023)



The Netherlands' failure to inspect the legally required benchmark of non-EU direct landings—including those from vessels flagged to high-risk countries for IUU fishing—could be enabling the entrance and trade of IUU fishing products within the EU market. This non-compliance with legal landing checks undermines the efforts to keep the EU market free of IUU caught products by the European Commission and of those Member States, such as Spain and Ireland, who go well beyond the legally required benchmark to prevent the entrance of products of IUU fishing.

Recommendations to strengthen EU import control implementation

To ensure consistent and effective implementation of seafood import controls across the EU and prevent products of IUU fishing from entering through gaps left by some Member States, we provide recommendations below for both the European Commission and Member States.

The European Commission should:

- **Launch infringement procedures** against Member States that have repeatedly failed to implement the EU IUU Regulation.
- **Encourage and streamline Member States' biennial reporting on the implementation of the EU IUU Regulation** in order to improve data submission and better hold poor-performing Member States to account.
- **Improve transparency** by publishing comprehensive information on Member States' implementation of the EU IUU Regulation. This should include either full publication of the biennial reports or detailed summaries that contain essential data points.

Member States should:

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The Environmental Justice Foundation, Oceana, The Nature Conservancy, The Pew Charitable Trusts and WWF EU are working together to promote EU leadership in improving global fisheries transparency and governance to end illegal, unreported and unregulated fishing.

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For more news, updates and documents supporting the EU to end IUU fishing, visit: www.iuuwatch.eu or contact: info@iuuwatch.eu



Endnotes

- 1 FAO (2024) The State of World Fisheries and Aquaculture 2024 – Blue Transformation in action. <https://doi.org/10.4060/cd0683en>.
- 2 UN (2024) The toll of Illegal, Unreported, and Unregulated Fishing. Available online at: <https://www.un.org/en/observances/end-illegal-fishing-day>.
- 3 Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109>. Accessed 20.05.25.
- 4 Article 9 (1) of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109>.
- 5 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports. Available at: <https://www.iuuwatch.eu/resources/>.
- 6 EJF, Oceana, The Pew Charitable Trusts, & WWF (2017) The EU IUU Regulation Analysis: Implementation of EU seafood import controls. Available at: <https://www.iuuwatch.eu/resources/>.
- 7 The EU's CATCH IT system, currently voluntary, digitises the EU's catch certification scheme, enabling electronic data submission and exchange. It electronically handles, stores, and manages data while supporting checks, risk screening, verifications, controls, and quantity management. Use of the system by EU importers and EU Member States will be mandatory from 10 January 2026. For more information on CATCH, see the April 2025 CATCH FAQs: <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/ab2ae1c8-b7a6-4811-9c98-8479fb110d92/file.bin>. See Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202302842.
- 8 Commissioner Costas Kadis' Mission Letter available at: https://commission.europa.eu/document/download/028ce7d5-e328-4416-8f0d-35c8884acaa8_en?filename=Mission%20letter%20-%20KADIS.pdf
- 9 More information available at: https://ec.europa.eu/commission/presscorner/detail/en/inf_25_1241. Accessed 28.07.25.
- 10 EUMOFA (2024) EU Fish Market 2024 Edition. Available at: <https://op.europa.eu/en/publication-detail/-/publication/22f27511-b382-11ef-acb1-01aa75ed71a1>.
- 11 European Court of Auditors. (2022). Special report 20/2022: EU action to combat illegal fishing – Control systems in place but weakened by uneven checks and sanctions by Member States. Available at: <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=61941>.
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- 15 den Boer, H., Logger, B. & Weijen, P. (2024) Smuggling for Putin, available at: <https://www.groene.nl/artikel/smokkelen-voor-poetin>.
- 16 MAC/LDAC (2023) The need for harmonised import controls between Member States in order to prevent the products of illegal, unreported and unregulated (IUU) fishing from entering the European Union market. Available at: https://ldac.eu/images/MAC_LDAC_Advice_IUU_Import_Controls_21.04.2023.pdf.
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- 19 Article 55 of the Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109>. Accessed 11.03.25.
- 20 You can find the Member State Biennial Reports from 2012/13-2022/23 on the EU IUU Fishing Coalition's website: <https://www.iuuwatch.eu/the-iuu-regulation/member-state-implementation/>.
- 21 We conducted a Pearson's correlation test investigating the relationship between the number of verification requests sent to flag states and the number of import consignment refusals between 2012-2023 as reported by all Member States from the biennial reports. Pearson's correlation test: $r(df\ 146) = 0.7, P < 0.001$.
- 22 This may partly be explained by a growing number of third countries creating online databases to check catch certificate validity, however, the positive correlation between verification requests and refusals still stands, meaning Member States should continue to conduct verification to ensure that databases are reliable.
- 23 Selig, E.R., Nakayama, S., Wabnitz, C.C.C., Österblom, H., et al. (2022) Revealing global risks of labor abuse and illegal, unreported, and unregulated fishing. *Nature Communications*, 13; 1612. <https://doi.org/10.1038/s41467-022-28916-2>.
- 24 <https://iuufishingindex.net/ranking>.
- 25 The top ten extra-EU importing MS by tonnage from 2023 are (starting with the biggest importer): Spain, Denmark, Sweden, Netherlands, France, Italy, Germany, Poland, Portugal, and Belgium. Reported by the European Market Observatory for Fisheries and Aquaculture Products (2024) EU Fish Market 2024 Edition. Available at: <https://op.europa.eu/en/publication-detail/-/publication/22f27511-b382-11ef-acb1-01aa75ed71a1>. Accessed 15.05.25.
- 26 Italy's yellow-carded country catch certificates made up 4% in 2020/21 and 5% in 2022/23 of their total catch certificates received, and for Portugal 8% in 2020/21 and 9% in 2022/23. Summary statistics were extracted from the Member State's biennial reports.
- 27 Italy did not report how many catch certificates verifications and refusals were conducted in its 2020/21 biennial report.
- 28 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports. Available at: <https://www.iuuwatch.eu/resources/>.
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- 30 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports. Available at: <https://www.iuuwatch.eu/resources/>.
- 31 These Member States are highlighted as they have all failed to meet the 5% inspection requirement, it worth noting that Latvia did not inspect any of its 4 direct landings in 2023, but as they receive comparatively less than the other Member States we did not include them in the figure.
- 32 According to the IUU Fishing Risk Index, available at: <https://iuufishingindex.net/>.