



DRAFT MINUTES

37th meeting of LDAC Working Group 5 - HORIZONTAL ISSUES

Wednesday, 11 March 2026, afternoon session 14:00-17:00h CEST

Thursday, 12 March 2026, morning session 09:30-12:30h CEST

Venue: Hotel Martin's Brussels EU Hotel

(Bvd. Charlemagne 80, 1000 Brussels)

Chair: Julien Daudu (EJF)

Vice Chair: Daniel Voces (Europêche)

1. Welcome by the Chair

WG5 Chair, Mr. Julien Daudu, welcomes all members and observers, including rapporteurs, representatives of the European Commission and of EU Member States' national administrations.

The complete list of attendees is included in **ANNEX I**.

2. Adoption of minutes of the last WG5 meeting –15-16 October 2025

The minutes of the previous WG5 meeting are approved with no changes or additional comments.

3. Approval of the agenda

The draft agenda is approved with no changes or comments to it.

4. Fight against Illegal, Unreported and Unregulated fishing (IUU)

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

Mr Roberto Cesari (DG MARE) provided an update on the Commission's IUU work, noting the significant workload linked to the implementation of IT CATCH. Priority country files included Vietnam, Panama, Ghana and Senegal, alongside follow-up work with Suriname/French Guiana and Liberia.

He explained that the Commission team was simultaneously managing the roll-out of IT CATCH and a large number of exchanges with Member States and third countries. Against that operational background, he reviewed the main country dialogues and stressed that the Commission would continue to base any carding decision on documented shortcomings and the response of the authorities concerned.

- Senegal: the Commission recalled that the yellow card was issued in May 2024 following evidence of illegal activity by Senegalese-flagged vessels, illegal exports to the EU and weaknesses in controls and traceability. DG MARE described cooperation as insufficient and indicated that the file remained critical. Members raised concern about the possible impact of stronger measures on small-scale fisheries. DG MARE stressed that the central issue was the



authorities' capacity to control and trace exported products, rather than the artisanal sector itself.

- Ghana: progress was acknowledged, including adoption of a new Fisheries Bill, but shortcomings remained in monitoring, control and surveillance, port controls and enforcement in the tuna and trawler segments. Capacity-building support for implementation of the Port State Measures Agreement (PSMA) was confirmed.
- Liberia and Sierra Leone: DG MARE reported persistent weaknesses in control of fishing and support vessels in Liberia. Regarding Sierra Leone, there had been little recent engagement and concerns remained about weak fisheries control, including activities by flagged vessels outside the EEZ.
- Ecuador: following high-level exchanges in Brussels, the authorities had been given time to address outstanding issues. Particular attention was drawn to control of purse-seine tuna fleet capacity, processing plants and enforcement. September 2026 was mentioned as the relevant deadline for assessing progress.
- Panama: concerns continued regarding control of reefers and compliance in regional fisheries organisations. DG MARE indicated that the next steps would depend on demonstrable progress and that action under the IUU Regulation did not necessarily depend on a further mission.
- Thailand and Vietnam: DG MARE was monitoring legislative and enforcement developments in Thailand to ensure that previous improvements were not weakened. In Vietnam, outstanding issues included incomplete VMS coverage, disconnections and the effectiveness of enforcement, despite strong political interest in lifting the yellow card.
- China: technical dialogue continued on implementation of the PSMA, port designation and alignment of implementing rules, including for the distant-water fleet, with the recently adopted fisheries law. A high-level fisheries dialogue, IUU working group and stakeholder forum were announced for 20 April.
- Suriname/French Guiana and other files: cooperation with Suriname continued, including work with FAO on fisheries legislation and subregional cooperation. Questionnaires/dialogue were also being extended to Venezuela and Brazil. No substantive new developments were reported for Oman, Cameroon or Comoros.

In the exchange with members, questions were also raised about EU nationals and companies potentially linked to transshipment or support activities involving Russian fishing vessels in the NEAFC area. DG MARE replied that sufficiently substantiated information would be required before further action could be considered.

Members also asked about the availability of information on China's new fisheries legislation and its implementing structure, the timing of a possible mission to Panama, and the support being provided to Ghana. DG MARE confirmed ongoing capacity-building support to Ghana and explained that developments in Panama were also being considered in light of difficulties in RFMOs, including NEAFC and SPRFMO.



4.2- Exchange of views with DG MARE: feedback from LDAC on provisions related to the external fleet, particularly the IT CATCH system

Mr Roberto Cesari (DG MARE) described IT CATCH as a major element of the revised catch certification system and acknowledged the operational difficulties of the initial implementation phase. The Commission reported a high volume of importer declarations and requests for assistance and said that support to Member States and operators remained a priority. Work was also under way with third countries on interoperability or direct use of the system, alongside training in Asia, West Africa and Latin America.

The Commission recalled that the electronic catch certification approach had been under preparation for several years and was intended to create an EU-wide database that could strengthen verification and risk analysis. New information fields, including vessel IMO number, beneficial ownership, fishing gear and FAO area, were highlighted as useful for detecting inconsistencies and supporting IUU investigations. During the initial phase, flexibility was being provided for certain fields so that incomplete entries would not automatically block the system.

Members supported the objective of the electronic system but reported practical problems, including delays, differences between Member States, inconsistencies in vessel/company registration, difficulties contacting administrations and uneven transitional arrangements. Several speakers warned that asymmetric implementation could penalise the most compliant operators. DG MARE encouraged members to raise concrete technical problems so that they could be addressed with Member States, rather than reopening the political decision to introduce the system.

Representatives of the catching and processing sectors gave examples of certificates delayed since January, manuals or screen interfaces not matching operators' experience, and different practices concerning vessel names, company names and importer registration. It was also noted that some Member States had allowed paper and electronic procedures to operate in parallel, while others had not, creating concerns about a level playing field. DG MARE referred to repeated working meetings and hands-on training with Member States and reiterated its willingness to examine specific cases.

4.3- Presentation by OCEANA on the report: *"Flags of convenience and hidden ownership: EU-owned fishing vessels in high-risk jurisdictions"* (Vanya V.)

Mrs Vanya Vulperhorst, Oceana, presented work on flags of convenience and hidden ownership. Members questioned aspects of the methodology, including the distinction between flags of convenience, open registers and high-risk flags; the treatment of access to fishing resources as a reason for reflagging; the consistency of datasets; and the exclusion of reefers. The discussion also highlighted the distinction between EU-flagged vessels covered by SMEFF and EU-owned vessels flying third-country flags.

The presentation is available here:

https://ldac.eu/images/Presentation_FoC_report_Oceana_Final.pdf

The report can be found here: https://ldac.eu/images/EN_OCEANA_Report-flags-of-convenience-Jan2026.pdf



Several industry representatives cautioned that reflagging can also be linked to legitimate access to fishing opportunities in third-country waters and argued that the analysis should distinguish this from attempts to avoid controls.

Questions were raised about apparent differences between datasets for Spanish and Greek interests and about whether vessels identified in the study had actually been linked to infringements or sanctions. Other members stressed the importance of improved traceability and transparency regarding ownership.

4.4- Next steps: ideas for drafting a LDAC advice on Flags of Convenience.

Members agreed that any future LDAC work should take account of the Commission study, existing LDAC/MAC advice, examples of good practice and information on beneficial ownership, while avoiding premature conclusions before the Commission's broader work on the external dimension of fisheries is available.

The discussion also addressed reefers and transshipment. Some members considered that support vessels should receive greater attention because of their potential role in high-risk fishing activities. Oceana explained that the dataset used for the report focused on fishing vessels and did not systematically capture reefers. The group therefore favoured returning to the subject once additional Commission work and implementation experience from IT CATCH were available.

ACTIONS:

- **Revisit the issue of flags of convenience when it may coincide with publication of the Commission's work on external fisheries action.**

5. Draft advice on Impacts of Climate Change in non-EU waters fisheries

Mr Alexandre Rodríguez, general secretary, explained the draft advice which was adopted by the WG5.

Action:

- **The draft advice will be put forward for approval at the Executive Committee meeting on 12 March 2026.**

6. Report from Secretariat on:

Mr Alexandre Rodríguez, general secretary, summed up the date and agenda of the next EFCA Advisory Board meeting, and the high-level conference ETP in EU Fisheries and Aquaculture (Brussels, 17 Feb. 2026)

Action:

- **Circulate the call for expressions of interest/recommendations for the Expert Technical Panel (ETP)**
- **Circulate a shared document requesting members' input for preparation of the EFCA Advisory Board meeting in Vigo on 21 April.**

7. Evaluation of the Common Fisheries Policy (CFP) and development of an Ocean Act

7.1- Update from DG MARE regarding the evaluation of the CFP regulation and the European Ocean Act

No EC representative attended, explaining that there had not been much progress or any real update on the evaluation of the CFP regulation, and that the results should be



published by late April or early May. Regarding the Ocean Act, aside from the current applications for the Ocean Board, there are no updates either; they plan to provide an update at the next inter-AC meeting.

7.2- Presentation and exchange on "[A European Ocean Observation Initiative](#)"

The European Commission had submitted a presentation on the European Ocean Observation Initiative, but no representative was available to present it. It was therefore agreed that the presentation would be uploaded to the LDAC website and shared with WG5 members; any questions would be transmitted through the Secretariat to the relevant DG MARE contact.

The presentation can be found here:

https://www.ldac.eu/images/Presentation_OceanEye_MARE_A.1.pdf

7.3- Exchange of views and way forward.

ACTION:

- **Share the Commission presentation on the European Ocean Observation Initiative with WG5 members and channel any questions through the Secretariat.**

8. EU strategy for fisheries external action:

8.1- Report by Chairs/Secretariat on outcomes of bilateral meeting with Director B MARE and his team (Madrid, 20 January 2026)

Mr Julien Daudu, Chair WG5 summarized the outcomes of the bilateral meeting with the DG MARE Director B and his team.

8.2-Update by Chair/Secretariat on process and timing for adoption of Communication: input of LDAC and next steps

An update was provided regarding the timeline for the adoption of the Communication. It was highlighted that the Strategy is set to be officially adopted in autumn 2026, in conjunction with the 2040 Vision.

9. International Ocean Governance: Implementation of UN BBNJ

9.1- Update from DG MARE on calendar of meetings and policy developments made in the UN (Prep.Com3); and state of play of [EC proposal for a directive](#)

FAO Sub-Committee on Fisheries Management

The meeting reviewed the recent FAO Sub-Committee on Fisheries Management, including regional fisheries management, unregulated fisheries and the relationship between RFMOs/RFBs and the BBNJ framework. The importance of the non-undermining principle, cooperation and information exchange was highlighted, as was the role of RFMOs in wider international ocean governance. LDAC feedback welcomed the emphasis placed on RFMOs and science-based cooperation, including for fisheries not currently regulated by an RFMO, while noting discussions on IUU fishing, data gaps, climate change, small-scale fisheries and multispecies/multigear fisheries.

LDAC participants reported positively on the organisation of the meeting in Iceland and on the attention given to unregulated fisheries and the contribution of regional bodies. They noted, among other themes, discussion of shortfin squid, flag-State data gaps, the state of stocks and



the challenges posed by climate change and complex multispecies/multigear fisheries. China's active participation was also noted.

Mr Marc Richir (DG MARE) thanked the LDAC for its contributions and stressed the value of receiving written input early enough to inform EU coordination. He confirmed EU support for work on data gaps and noted that the Commission intended to continue reflecting on the role of RFMOs in the implementation of BBNJ.

Mr Richir explained that the usefulness of stakeholder input depends heavily on timing: once Council coordination is advanced, the scope for integrating new elements is more limited. He therefore encouraged the LDAC to provide concise written contributions sufficiently early. He also noted that the next FAO Sub-Committee would be chaired by India and was expected to be held in person.

ACTION:

- **Ask DG MARE/FAO whether the recommendations from the FAO Sub-Committee on Fisheries Management can be shared with the LDAC.**

DG MARE explained that the EU and Member States coordinate positions for the BBNJ Preparatory Committee through the relevant Council structures. The Commission indicated that RFMO colleagues had begun considering the role of RFMOs under BBNJ and that an event bringing together RFMO secretariats and members was envisaged for early 2027. Members called for a positive and practical articulation of how existing fisheries bodies can contribute to BBNJ implementation, while preserving the non-undermining principle.

In response to questions, DG MARE clarified that Commission and Member State representatives may take the floor at PrepCom on the basis of a pre-agreed EU position. Members asked how consistently the EU was promoting the role of RFMOs across different organisations and whether stakeholders could be involved in the planned 2027 event. DG MARE indicated that submissions on BBNJ in RFMOs would continue and that ideas for the 2027 event were still being developed.

The LDAC discussed a first draft advice on BBNJ. Possible elements included: the relationship between UNCLOS, the UN Fish Stocks Agreement and BBNJ; practical cooperation with RFMOs; integration of fisheries management measures, OECMs and area-based management tools; equivalence of environmental impact assessment procedures; participation of fisheries scientists in the Scientific and Technical Body; transparency and the clearing-house mechanism; stakeholder participation in COP delegations; and approaches to fisheries not covered by RFMOs.

Participants stressed that the advice should move beyond a defensive interpretation of the non-undermining principle and describe concretely how RFMOs can contribute to implementation. Concerns were nevertheless expressed about the treatment of that principle in the proposed EU implementing legislation and about ensuring that fisheries expertise is adequately represented in the emerging BBNJ architecture.

Given the timing of PrepCom3, members considered that the advice should incorporate relevant outcomes from that meeting and be available in advance of the UN Fish Stocks



Agreement discussions on 20–22 May. DG MARE suggested that late April/early May would still be useful, with earlier written elements welcomed where possible.

Some members initially questioned whether a useful contribution could be finalised before PrepCom3. The discussion converged on using the PrepCom outcome to refine the text and targeting the subsequent UN Fish Stocks Agreement discussions. DG MARE considered that a contribution received two to three weeks before the 20 May meeting could still be useful, while any earlier written elements could also feed into preparatory work.

9.2- Discussion on LDAC draft advice on linkages and interaction between BBNJ and other international bodies including role of RFMOs.

After a discussion it was agreed the following **ACTIONS**:

- **The Secretariat will circulate the draft BBNJ advice and a Doodle and convene an ad hoc Focus Group as soon as possible.**
- **The draft should emphasise the relationship between UNCLOS, the UN Fish Stocks Agreement, the International Seabed Authority framework and BBNJ, particularly in the context of consultations linked to the UNFSA Review Conference.**

10. Social Dimension of CFP and labour issues linked to import and trade

10.1- EC report on proposals to amend the due diligence Directive

Members regretted the lack of replies to questions previously submitted in writing to DG JUST on due diligence and reiterated the LDAC's interest in the issue.

The group asked the Secretariat to maintain the issue on the Commission's radar and to seek a substantive response to the questions already transmitted, rather than opening a separate new discussion on the basis of incomplete information.

ACTION

- **Reiterate the outstanding questions on due diligence and convey the LDAC's request for clarification through the relevant Commission contacts.**

10.2- EC update on the Forced Labour Regulation (expert group on forced labour...)

Representatives of DG TRADE, Ms Vilija Cimbalaitė, and DG GROW, Ms Ana María Peña Segura, presented the EU Forced Labour Regulation, which is intended to prevent products made with forced labour from being placed or made available on the EU market or exported from it. The Regulation covers products irrespective of sector or origin and provides for risk assessment, investigation and enforcement. A single information submission point is being developed so that stakeholders, including workers, economic operators, NGOs and trade unions, can submit information on suspected forced labour.

The presentation distinguished the preliminary risk-assessment phase from a full investigation and explained that a decision to prohibit a product would follow only after the applicable investigative procedure. The system is product-focused rather than a public list of individual economic operators.

Members welcomed the Regulation as a complement to the EU IUU framework but stressed the particular complexity of fisheries supply chains, where labour abuses may occur at sea and products may be transhipped, landed, processed or exported through several jurisdictions. Questions focused on how geographic and product-based risk information would capture



fishing fleets and flag States, how responsibilities would be divided between the Commission and Member States, and how due-diligence systems would be considered during investigations.

The Chair referred to evidence of labour abuses reported in some distant-water fleets, including physical violence and retention of passports, and asked how such evidence could be captured where the abuse takes place on board a vessel but the product subsequently passes through several countries. Members also asked whether the risk database could reflect fleets and flag States rather than only broad geographic origin, and how small-scale fisheries and complex supply chains would be treated.

The Commission explained that cases concerning forced labour in third countries would be investigated at EU level, while cases within a Member State would fall to the competent national authority. The risk-based methodology under development would consider, among other factors, the scale and severity of the suspected case, the quantity/volume of products entering the EU market and the type/complexity of the product. Economic operators would not routinely submit information unless contacted in the context of an investigation, although credible due-diligence systems could be relevant when assessing their conduct.

Commission representatives added that the single information submission mechanism is intended to be accessible to a wide range of stakeholders. They referred to previous cooperation programmes in South-East Asia as examples of engagement with third countries on labour conditions in supply chains. On the division of responsibilities, the Commission would take the lead for suspected forced labour occurring outside EU territory, whereas competent Member State authorities would deal with cases occurring within their territory.

Ms Isabelle Garzon (DG MARE) underlined that the FLR represented an important link between sustainable fisheries policy and trade in fisheries products. She identified specific fisheries challenges requiring further work, including flag-State responsibility at sea, beneficial ownership, operational application of the Regulation, the value-chain approach, cooperation with third countries and links with ILO and diplomatic efforts.

From the fisheries perspective, she stressed the need to understand what the EU imports, how products move through the value chain and which actors have responsibilities downstream from the catch. Further implementation work would need to connect fisheries management, labour standards, trade controls and international cooperation without losing sight of the specific responsibilities of flag States and operators.

10.3- Update on EU Social Partners project – Pillars of the Sea IV

Due to a lack of time, Mr Daniel Voces will send LDAC the information on the EU Social Partners Project- Pillars of the Sea IV to be shared with LDAC members.

11. Presentation on ITF investigative report on Labour Exploitation in Distant Water Fishing Vessels Registered With the SPRFMO: | ITF Global

Sabina GOLDARACENA and Sergio ALMADA, on behalf of ITF, gave a presentation.

After questions from members, it was agreed the following **ACTIONS**:

- **To send the draft advice on Indian Ocean fisheries to interested colleagues**

AOB (only information points)

The Secretariat and Chair recalled the agreed follow-up actions, including preparation for the EFCA Advisory Board, continuation of the BBNJ drafting process and circulation of relevant documents.



With no other issues to address, the Chair, Mr. Daudu, announces that the next WG5 meeting will be held in March 2026 in Brussels (exact date to be confirmed).

To conclude, he thanks participants for their contributions, the interpreters for the quality of their work and the Secretariat for their coordination work and efforts throughout the year.

CLOSURE



**Annex I: List of LDAC WG5 attendees
Brussels, 12 and 13 March 2026**

WORKING GROUP MEMBERS

1. Julien Daudu. EJF
2. Daniel Voces. EUROPÊCHE
3. Béatrice Gorez. CFFA-CAPE
4. Tim Hedemma. Pelagic Freezer trawler Association
5. Iván López. AGARBA/CEPESCA
6. Aivaras Labanauskas. Lithuanian Long Distance Fisheries Association
7. Anne-France Mattlet. Europêche tuna group
8. Raúl García.WWF
9. Michel Goujon.ORTHONGEL
10. Vanya Vulperhorst. OCEANA
11. Ángela Cortina. Opana / OPP3/Agarba
12. Emil Remisz. High Seas Fish Producers Organization
13. Yago Rosado.OCEANA
14. Julio Morón.OPAGAC/AGAC
15. Despina Symons. EBCD
16. Janne Posti.Conxemar
17. Francisco Mari. BFW
18. Iris Ziegler. Seas at Risk
19. Renee Heal.DSCC
20. Francisco Fernández.OPROMAR/ANACEF
21. Nikolas Evangelides. The Pew Charitable Trusts
22. Maximilian Schwarz. EBCD
23. Luis Vicente. ADAPI
24. Hector Fernández.Bolton Food
25. Margot Angibaud. EUROPECHE

Observers & speakers

26. Roberto Cesari.EC
27. Desirée KJOLSEN. EC
28. Marc Richir. EC
29. Ana M^a Pena Segura. DG GROW
30. Vilija Cimbalaite. DG TRADE
31. Isabelle Garzon. EC
32. Irina Popescu. European Parliament
33. Stephanie Czudaj. GIZ
34. Isadora Moniz.MSC
35. Margarita Mancebo. SGP (Zoom)
36. Luis Belmonte. SGP (Zoom)



- 37. Sabina Goldaracena. ITF (Zoom)
- 38. Sergio Almada. ITF (Zoom)
- 39. Carmen Gómez. SGP
- 40. Linne Verhoeven. Seafood Euroope
- 41. Eugenia Cadenas. SGP (Zoom)

LDAC Secretariat

- 42. Alexandre Rodríguez. LDAC
- 43. Manuela Iglesias. LDAC
- 44. Marta de Lucas. LDAC (Zoom)