



A/A Charlina VITCHEVA
European Commission
DG MARE, J-II 99 B-1000 Brussels

Madrid, 23rd December 2024
Ref.: R-08-Ej.18 (2024-2025)/WG5

Subject: Need for a level playing field with ‘mirror clauses’ for imports from China to the European Union.



Dear Director-General Vitcheva,

The purpose of this letter is to inform you that since 2022 the LDAC Working Group 5, which deals with horizontal issues, has encountered problems with fishery exports to China. These problems not only impose new burdens on economic operators, but also create a competitive disadvantage, especially given the alarming lack of control of Chinese imports in the Member States.

The bureaucratic conditions established by the Chinese authorities for companies wishing to export fishery products to their country are extremely complex. They not only apply to products exported directly to China, but also to processors trading with this country. In addition, confidential and sensitive data that breach EU regulations (such as crew health data or documents that violate industrial secrecy) are requested.

In view of this situation, the LDAC - in line with its pieces of advice on the Level Playing Field¹ and on the activities of the Chinese fleet² - calls for the EU to require the same conditions for fishery products from China. One of the tools for achieving a level playing field is for the European Union to require the same health, animal welfare and environmental requirements for agri-food products imported from third countries as for EU products. In this regard, the LDAC wishes to highlight the clear recommendations it issued—jointly with the Market Advisory Council—in a piece of advice dated 21 April 2023, on the need for harmonised import controls³. The framework imposed by the World Trade Organisation should be respected along with the importance of the principle of reciprocity and the ‘mirror clauses’ that should govern the negotiation and review of EU trade agreements.

Yours sincerely,

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Iván López van der Veen
LDAC Chair

¹ Vid. LDAC Recommendations for a Level Playing Field for EU and non-EU fish products [EN_LDAC_Advice_LPF_25May2021.pdf](https://ldac.eu/images/LDAC_Advice_LPF_25May2021.pdf)

² Vid. LDAC and MAC (Market Advisory Council) joint advice on: Addressing China's global distant water fleet activities implications for fisheries governance https://ldac.eu/images/LDAC-MAC_Joint_Advice_China_Distant_Water_Fleets_13Dic2022.pdf

³ Vid. LDAC and MAC joint advice on: 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. https://ldac.eu/images/MAC_LDAC_Advice_-_IUU_Import_Controls_21.04.2023.pdf