

Differences in scope and quality of checks by Member States persist

Preliminary findings on the implementation of EU import controls measures in 2020-23



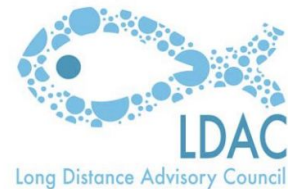
Long Distance Advisory Council (WG 5), Brussels, 16 Oct 2024

Presented by:

Amélie Giardini from the Environmental Justice Foundation (EJF), a member of the **EU IUU Fishing Coalition**.

Disparity in implementation of import controls across Member States

According to the 2018-19 biennial reports



MAC-LDAC Advice

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

Brussels & Madrid, 21 April 2023



Disparity in implementation of import controls across Member States

According to the 2018-19 biennial reports



“Significant differences in scope and quality of checks by Member States weaken the system”

European Court of Auditor report (2022)

→ **ECA recommends differences be addressed by 2026**



What will digitalisation of catch certificates (CATCH IT) not solve?



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CHECKS OF ALL IMPORT CCS
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**APPLICATION OF A RISK-BASED
APPROACH TO ASSESSING CCS**



**VERIFICATION OF CCS TO
ASCERTAIN COMPLIANCE OF
IMPORTS**



PHYSICAL INSPECTIONS



**REJECTION OF CONSIGNMENTS
IN THE CASE OF NON-
COMPLIANCE**



**BIENNIAL REPORTING ON
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REGULATION**



CATCH IT will not solve the lack of:



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Have verifications and rejections increased since 2018-19?



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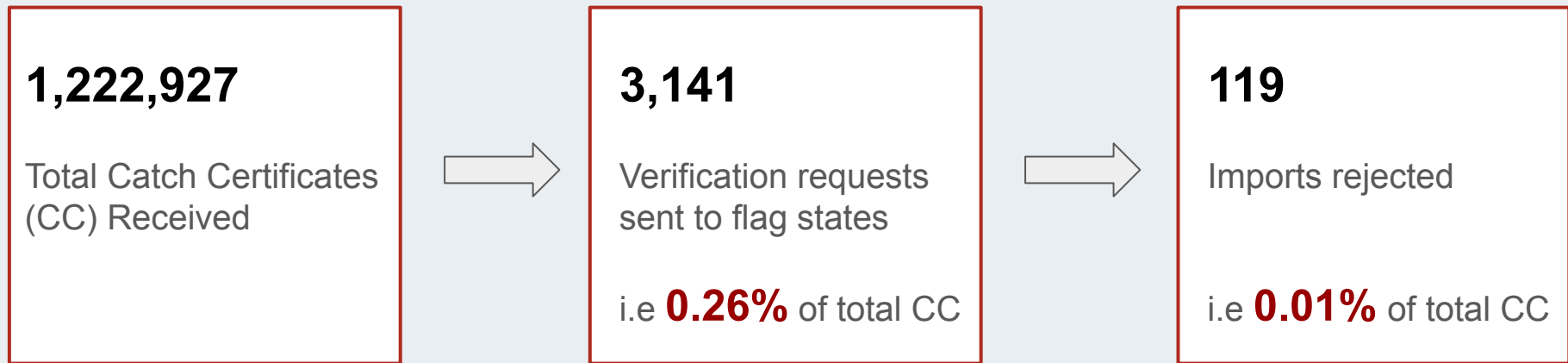


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Low verifications and rejections of imported fishery products persist

Overview across all 26 reporting Member States, between **2018-2023***:



* noting that our 2022-23 dataset is for now incomplete (8 countries missing)



Low verifications and rejections of imported fishery products persist

Comparison of some top importing Member States*:

Year	# Catch Certificates (CC) submitted			# Verification requests sent to flag state			# rejected imports		
	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23
Spain	122,222	109,271	121,337	551	207	314	13	10	15
Italy	96,736	83,005	60,903	1	0	2	0	0	2
Germany	41,965	35,452	-	223	431	-	1	9	7
Denmark	38,878	41,120	37,911	88	91	90	2	3	2
Sweden	32,505	31,584	31,132	0	0	0	0	0	0
Netherlands	22,878	29,311	26,635	89	101	140	16	10	3
Portugal	24,446	15,795	-	0	7	-	0	0	-

- Lack of control persists in Italy, Portugal & Sweden (tbc in 2022-23 for PT)

*note that the “-” in the table indicate that we have not yet obtained this data



Low verifications and rejections of imported fishery products persist

Comparison of some top importing Member States:

Year	# Catch Certificates (CC) submitted			# Verification requests sent to flag state			# rejected imports			% CC from carded countries & China		
	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23	2018-19	2020-21	2022-23
Spain	122,222	109,271	121,337	551	207	314	13	10	15	9%	9%	9%
Italy	96,736	83,005	60,903	1	0	2	0	0	2	13%	8%	9%
Germany	41,965	35,452	-	223	431	-	1	9	7	6%	6%	-
Denmark	38,878	41,120	37,911	88	91	90	2	3	2	2%	1%	1%
Sweden	32,505	31,584	31,132	0	0	0	0	0	0	1%	0.1%	0.3%
Netherlands	22,878	29,311	26,635	89	101	140	16	10	3	15%	11%	10%
Portugal	24,446	15,795	-	0	7	-	0	0	-	19%	19%	-

- Lack of control persists in Italy, Portugal & Sweden (tbc in 2022-23 for PT) – with a higher IUU-risk for IT & PT



Low verifications and rejections of imported fishery products persist

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Portugal	24,446	15,795	-	0	7	-	0	0	-

⇒ 0.01% rejections

- Lack of control persists in Italy, Portugal & Sweden (tbc in 2022-23 for PT)
- Low rejections, even in Member States with tighter controls (e.g. Spain: 0.01% of CC are rejected)



Fisheries products from China still not being rejected

Across all 26 reporting Member States:

2018 - 2019



2020 - 2021



2022-2023: across 17 Member States 10,219 CC from China → 1 rejection (dataset incomplete)



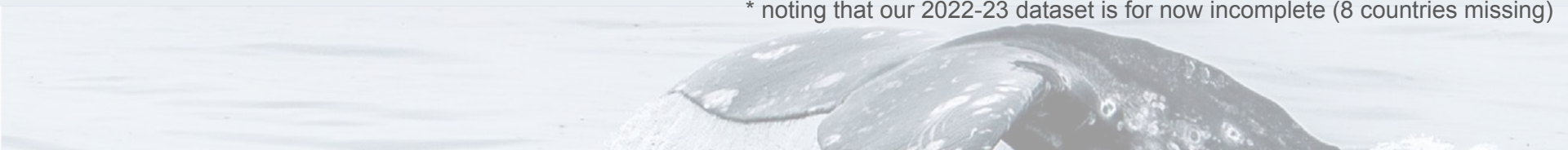
Most Member States do not verify information with processing states

Each year (2018 - 2023)



- Only few Member States verify catch certificates information with the processing states
- A few countries (e.g. Italy) do not provide information on number/origin of processing statements

* noting that our 2022-23 dataset is for now incomplete (8 countries missing)



Have physical inspections increased since 2018-19?



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PHYSICAL INSPECTIONS

Under the EU IUU Regulation,
Member States have to physically inspect **>5% of direct landings**

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Non-compliance with legal threshold for physical inspection of direct landings persist

Sample of the 11 Member States that declared receiving direct landings from third countries:

Year	# total Direct Landings (DL)					
	2018	2019	2020	2021	2022	2023
Spain	159	151	146	220	244	217
Netherlands	264	258	204	1217	1081	1137
Denmark	662	395	282	514	509	523
Poland	136	119	120	117	93	92
Lithuania	41	15	123	122	93	107
France	686	693	469	1148	-	-
Ireland	36	25	31	644	700	609

Note that the “-” in the table indicate that we have not yet obtained this data



Non-compliance with legal threshold for physical inspection of direct landings persist

Sample of the 11 Member States that declared receiving direct landings from third countries:

Year	# total Direct Landings (DL)						% DL Inspections (>5% required)					
	2018	2019	2020	2021	2022	2023	2018	2019	2020	2021	2022	2023
Spain	159	151	146	220	244	217	96.9%	92.7%	86.3%	74.5%	75.0%	81.1%
Netherlands	264	258	204	1217	1081	1137	5.3%	7.4%	3.4%	4.1%	4.4%	3.2%
Denmark	662	395	282	514	509	523	5.1%	4.1%	7.8%	5.3%	5.1%	4.6%
Poland	136	119	120	117	93	92	4.4%	2.5%	5.8%	4.3%	2.2%	2.2%
Lithuania	41	15	123	122	93	107	4.9%	13.3%	3.3%	4.9%	8.6%	9.3%
France	686	693	469	1148	-	-	14.6%	17.0%	17.1%	13.1%	-	-
Ireland	36	25	31	644	700	609	27.8%	20.0%	100.0%	44.7%	39.3%	34.3%

- Great differences between Member States in the proportion of DL being physically inspected
- Some of the Member States that receive the most DL inspect below the legal minimum threshold of 5%



Non-compliance with legal threshold for physical inspection of direct landings persist

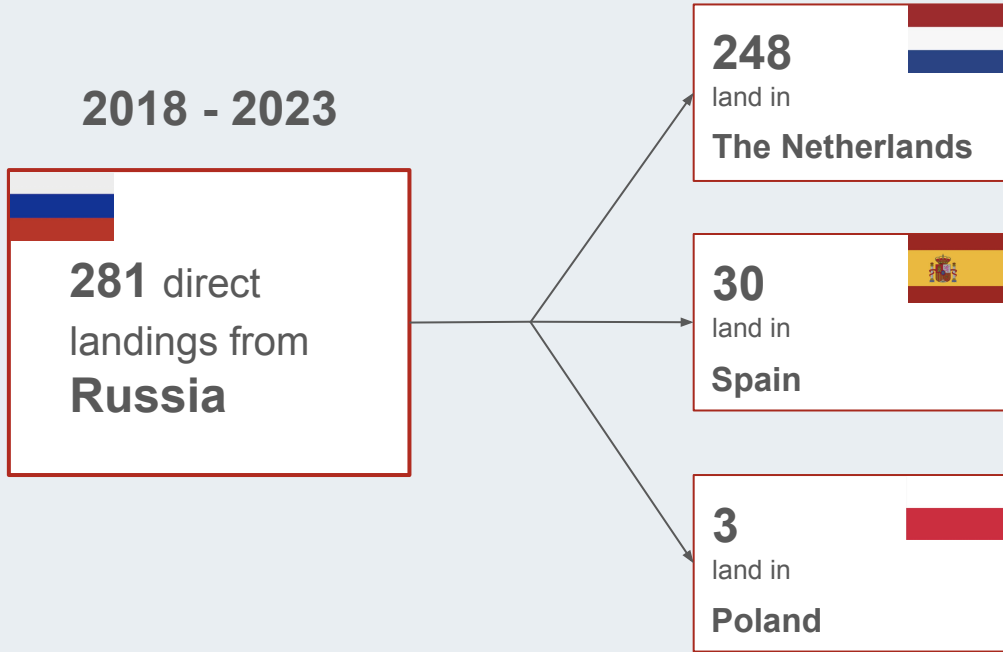
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Lithuania	41	15	123	122	93	107	4.9%	13.3%	3.3%	4.9%	8.6%	9.3%
France	686	693	469	1148	-	-	14.6%	17.0%	17.1%	13.1%	-	-
Ireland	36	25	31	644	700	609	27.8%	20.0%	100.0%	44.7%	39.3%	34.3%

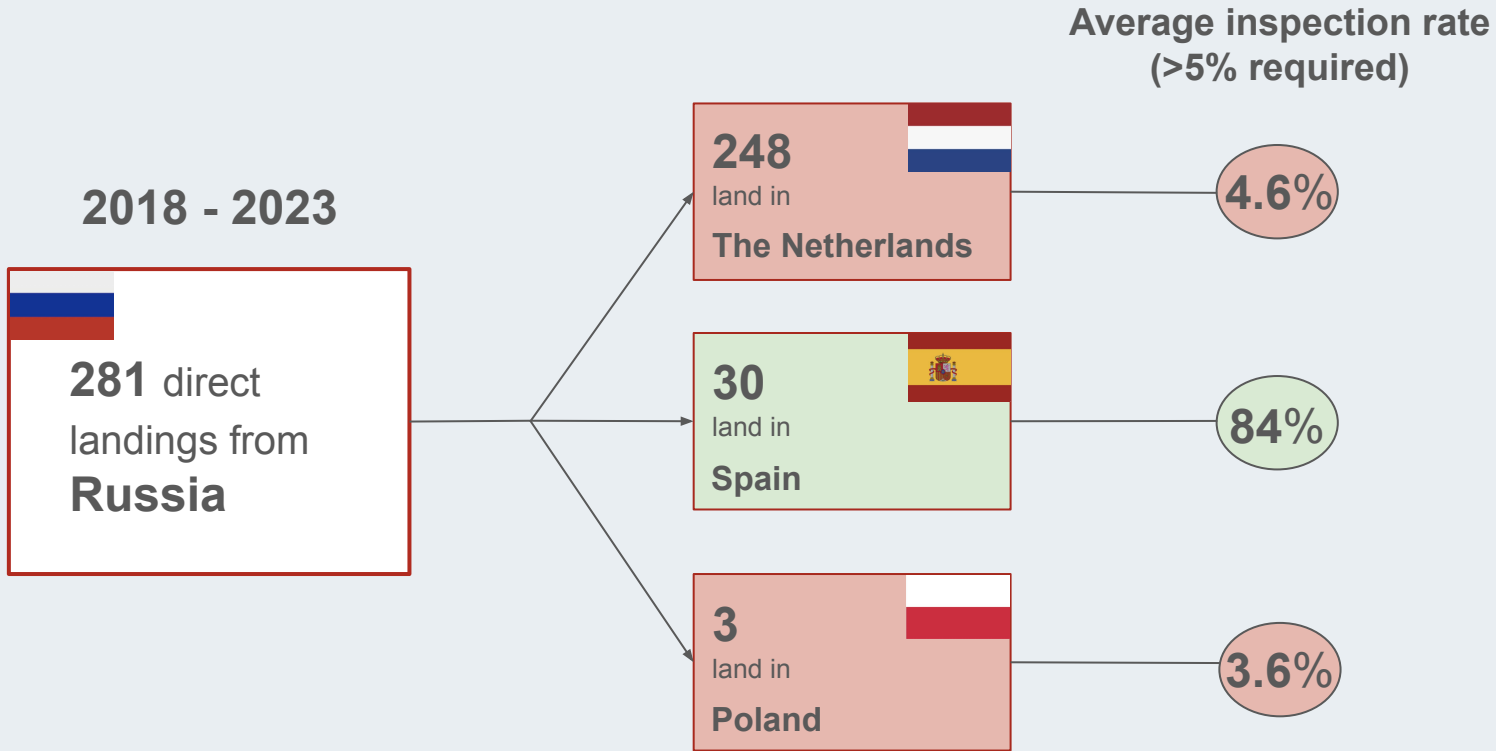
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Case study: disparity in physical inspections of Russian Direct Landings



Case study: disparity in physical inspections of Russian Direct Landings



ECA demands the Commission take action to remedy disparity in import controls by 2026



Recommendations of the European Court of Auditor (2022 report)

By 2026, the Commission should:

- Pursue digitalisation → CATCH IT
- Uniform risk identification criteria → included in CATCH IT
- **Monitor that the scope and quality of checks by Member States are sufficient to address the risks, and **take necessary actions to remedy any shortcomings****



A large school of silver fish, possibly sardines, is swimming in clear blue water above a vibrant coral reef. The fish are densely packed and move in a coordinated pattern. The coral reef below is diverse, featuring various species in shades of orange, yellow, pink, and green. The overall scene is a healthy and thriving marine ecosystem.

Thank you for your attention