ADVANCING EU EFFORTS TO COMBAT IUU FISHING:

Why CATCH Needs Reforms

An Alaska Seafood Industry Whitepaper

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Executive Summary

The Alaska seafood industry supports the European Union's (EU) objective and efforts to prevent illegal, unreported, and unregulated (IUU) fishing. Alaska fisheries operate under extensive state and federal management and monitoring systems, comprehensive harvest accounting, licensing requirements, and enforcement to support sustainability and suffer economically when IUU fish enters seafood supply chains.

Our central concern with EU CATCH is not the legitimacy of its conservation objective, but its failure to effectively and efficiently address IUU fishing risk. The EU goal of reducing IUU fishing cannot be met by EU CATCH, because the data collected are not reliable for IUU fishing detection and enforcement. EU CATCH 1) incorrectly assumes a constant, predictable relationship between catches and finished products, 2) incorrectly assumes that catches can be easily traced from initial harvest through production to finished products in high volume, complex fisheries, and 3) collects incomplete information by exempting some catches and finished products. These shortcomings leave a system that suggests IUU fishing where none is present, and at the same time creates opportunities for IUU catches to enter markets undetected.

Over the last eight months, the Alaska seafood industry has worked to implement EU CATCH with waivers for several data fields and more recently with permission to use the previous catch documentation. Even with this grace period, the Alaska seafood industry has encountered three principal problems with EU CATCH:

1. Harvest vessel reporting tracked through the production process does not work for highly processed, co-mingled products;
2. Product weight data (i.e., mass balances) are not a reliable indicator of IUU products; and
3. Unworkable data requirements have been imposed on the seafood industry with significant cost.

The EU is a leader in combatting IUU fishing. The Alaska seafood industry supports all efforts to eliminate IUU products from markets, as it creates unfair advantages in the marketplace and degrades ocean health. Product tracing is not a substitute for capacity building for fisheries enforcement and governance but rather must be a carefully designed complementary tool. The Alaska seafood industry encourages US and EU governmental authorities to collaborate on the broader suite of policy tools and enforcement efforts needed to counter IUU fishing activity directly.

The Alaska seafood industry has the following recommendations to improve the effectiveness of EU CATCH:

Recommendations

1. **Align traceability requirements with fishery risk and governance**
    a. **Create an alternative reporting pathway** for countries with effective domestic fisheries management regimes that include comprehensive licensing, rigorous stock and catch management, monitoring, and enforcement.
    b. **Recognize effective government controls.** Allow governments overseeing well managed fisheries to validate exports and use their audit systems to establish legal harvest without requiring every exporter to individually provide fisheries data that already exists in their domestic databases.

2. **Fix structural problems with EU Catch data requirements**
    a. **Permit aggregation at commercially meaningful control points.** Establish reporting by processing facility, identifying dates of production and a list of contributing harvest vessels. In addition, only one vessel identifier (e.g., state license, IMO number, or another unique identifier) should be required with the vessel name.
    b. **Eliminate the processing statement requirement.** Only finished product weights are relevant given the lack of a direct link between catch amounts and imported product weights.
    c. **Work with the seafood industry and government authorities to build genuine system interoperability.** Establish standardized data formats, bulk uploads, application programming interfaces, test environments, and error-handling protocols, preventing the same information from being entered manually multiple times.

3. **Collaborate in designing and testing counter IUU measures**
    a. **Establish a formal US-EU government and industry working group.** Facilitate meaningful engagement between the European Commission and all relevant US government agencies and the US and EU seafood industry.
    b. **Provide an extension on EU CATCH implementation until rigorous and transparent testing can be done.** Conduct fishery-by-fishery pilot-testing with harvesters, processors, exporters, National Competent Authorities, EU importers, and Member State authorities before imposing permanent requirements.

c. **Detain only the specific product with documentation issues.** Release all portions of consignments whose documentation is complete while errors are resolved, unless authorities identify a specific enforcement basis for holding the entire cargo.

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EU CATCH Cannot Detect IUU Fishing in Highly Processed, Co-Mingled Fisheries

Illegal, Unreported, and Unregulated (IUU) fishing is a significant global problem that must be addressed to protect ocean resources, support sustainable fisheries, and ensure fair global competition and long-term food security for communities that depend on seafood for their livelihoods. Under Regulation (EU) 2023/2842, EU imports became subject to mandatory use of EU CATCH - the European Commission's digital system for managing catch certificates and related seafood import documentation. The EU describes CATCH as a means of detecting IUU fishing. However, the system as implemented cannot meet that objective; rather, it has stifled the trade of legitimate seafood products.

EU CATCH is premised on a simple operational and supply chain model, which assumes data intended to track catch from the vessel through its import into the EU can be used to exclude IUU fish from the EU market and thus disincentivize IUU fishing. However, these data cannot establish whether catch is legitimate. Requiring this reporting shows a misunderstanding of fishery monitoring, the complexity of the seafood supply chain (particularly in high-volume fisheries with highly processed, co-mingled products), and the production processes needed to simultaneously support legal harvests and full utilization to avoid waste. The EU CATCH system has three main problems.

Problem 1: EU CATCH Does Not Work in Highly Processed, Co-Mingled Fisheries

Alaska has several high-volume fisheries. The Alaska salmon fishery has one of the most complex supply chains because of the number of participants and the geographic distribution of the fishery. Over the course of three months, 7,500 small independent harvesting vessels deliver 250,000 metric tons of salmon to processors. At the processing facilities, processors sort and consolidate catch again based on species, sex, size and quality. Processors then transform each fish into multiple primary and ancillary products and consolidate finished products. Finally, finished products are combined with seafood from multiple plants or companies for export. Tracing these products through the supply chain to specify each harvest vessel’s contribution to each finished product is not possible under this operational structure.

This challenge is further complicated by mid- and post-production quality assessments and decisions on whether to use lower quality fillets and trimmings to produce different product types altogether, such as surimi or mince. For example, in the pollock fishery, three billion pounds are landed annually, with landings processed into a mix of final products including fillets and surimi. Fillets of varying quality are produced at the outset. Surimi is a highly processed product produced through a continuous and repeated extraction process that begins with some

of the high-quality whole fillets and fillet trimmings. Residuals from high grade surimi production and some lower quality fillets and trimmings are used to produce lower surimi grades. The process is repeated successively, with the remaining residuals used for fish meal and oil. Given these operational flows, final products cannot be attributed to specific amounts of inputs or assigned to inputs from specific vessels, as the products are produced from several parallel streams sourced from several vessel offloads. Tracking vessel-level allocations through every transfer and processing step for high volume fisheries, would require segregation of inputs and outputs early in commercial operations limiting production to lower yields and increasing waste.

In summary, EU CATCH is not feasible because the final seafood products are decided at several steps in the production process after sorting and co-mingling has occurred multiple times.

Problem 2: Weight Data Cannot Reliably Identify Products from IUU Fisheries

The EU CATCH Annex IV processing statement is intended to support full traceability of each stage of production for all products. Incoming raw material quantities are to be linked to one or more valid catch certificates for each specific product import. These processing records are intended to demonstrate a clear and consistent relationship (i.e., mass balance) between inputs (raw material) and outputs (processed product).

This approach assumes that the presence of IUU fish can be revealed by unexpected variation in finished product weights (outputs) relative to the reported raw catch weights (inputs). However, this approach depends on:

- Full information on inputs;
- Full information on outputs; and
- Stable and predictable recovery rates (i.e., ratios of inputs to outputs).

The underlying assumption behind the calculation is not correct. In practice, product recovery rates in wild capture fisheries vary greatly (in some cases by as much as 100%) depending on the product form and variation in fish size, sex, and quality[1]. In addition, several products (e.g., production from set net fisheries and secondary products such as fish meal) are excluded from EU CATCH reporting, which means many shipments to the EU do not have full information on inputs, outputs, or both. Consequently, EU CATCH cannot use weights as a proxy for identifying legitimate versus IUU seafood. Several anomalies in weight calculations arise from the current process. First, in cases where inputs exempt from the program (e.g., set net fisheries that operate without a vessel) are mixed with landings that are included in the program, the data

[1] Crapo et al, Recoveries & Yields From Pacific Fish And Shellfish

may suggest the introduction of IUU fish despite all catches being legal. Second, the exclusion of several outputs from the system (such as meal and roe or products not being imported to the EU) creates an opportunity for IUU fish to enter the EU without detection in all but the most egregious or flagrant cases. Third, responsible producers able to make the greatest use of legal catches, through achieving higher than expected recovery rates and utilizing more of the fish, could appear to have used IUU fish in their products. ***At the most fundamental level, the system cannot effectively detect IUU products because it is based on a flawed understanding of seafood production.***

Effectively addressing IUU fishing requires monitoring fishing at its source, identifying and building capacity in countries with weak fisheries management and enforcement regimes, collaborating and sharing intelligence on illegal fishing activity in international waters, and taking steps to improve the efficiency and interoperability of national systems for monitoring product flows. A comprehensive, internationally coordinated approach to IUU fishing is needed. The Alaska seafood industry supports efforts by the US and EU to achieve this overarching policy objective.

Problem 3: EU CATCH Imposes Unworkable Reporting Requirements on Legitimate Fisheries

EU CATCH attempts to use excessive catch and production data to evaluate the legitimacy of seafood products instead of evaluating the actual management of the fishery. These burdens apply without regard to the underlying management structure, monitoring, or enforcement in a fishery. The result is costly reporting requirements for little or no gain in IUU prevention.

US fisheries are managed under a system that relies on the best available science, stakeholder collaboration, federal and state government coordination, and extensive monitoring and enforcement to achieve sustainability and achieve conservation objectives. Monitoring, tailored to the circumstances of the specific fishery, is used to assess fish stocks, track harvest levels, support management decisions, and ensure accountability. Fisheries observers are increasingly complemented by electronic monitoring technologies, including cameras and sensors. Extensive catch documentation is required throughout the seafood supply chain. Commercial landings are documented through fish tickets, landing reports, processor reports, and other reporting systems that record species, fishing periods, landing dates, harvest area, quantity, captain name, vessel name, fishing license, and other key information from every delivery.

Enforcement of fisheries regulations is conducted through a cooperative network of state and federal partners, under which state fish and game enforcement officers, NOAA Office of Law Enforcement and the U.S. Coast Guard work together to conduct dockside inspections, random

at-sea boardings, surveillance, investigations, and compliance assistance programs. Violations are met with strict penalties, creating a strong disincentive against infractions.

This comprehensive management and enforcement framework provides numerous opportunities to prevent IUU catches from entering the supply chain. With the extremely low potential for export of seafood products from IUU fishing from the US to the EU, the excessive burden of EU CATCH is not only unnecessary but also diverts resources that could be used for effective measures to address IUU fishing in areas that have a high risk.

EU CATCH Has Disrupted Markets and Imposed Excessive Compliance Costs

EU CATCH significantly increases costs for the seafood industry and consumers in three ways – increasing operational and reporting costs, increasing waste, and undermining commerce, including long-term business relationships.

First, the granular level of data required by EU CATCH transforms every single shipment into a full supply chain audit. In some cases, the cost of compliance exceeds the commercial value of the product. In a representative shipment analyzed by industry, compliance would require approximately 3,000 individual product records, each tied to a specific vessel landing. Even when aggregated to the tender vessel level, the shipment would still require several hundred records, each requiring separate certification and manual data entry into the EU system. This data entry alone requires significant additions to administrative staff. Further, to comply with EU CATCH companies may need to modify their production streams to allow for segregation of fish and intermediate products and weighing to facilitate specific vessel contributions to finished products. These modifications are not feasible without substantial modifications to operations, which would entail significant loss of production and costs that would be borne by EU buyers and consumers. EU companies that buy Alaska seafood and EU Member States have validated these concerns (see Appendix II).

Second, EU CATCH will discourage full utilization. Alaska processors seek to create value from the entire fish, including roe, mince, collars, meal, oil, and other secondary products. Those products often draw inputs from many fish and production lots. Processors would need to reduce recovery to comply; or when traceability and reporting costs exceed product value, redirect products to non-EU markets or decline to produce certain items for Europe. Steps should be taken to avoid this unintended environmental and economic outcome of a system intended to advance sustainability.

Third, compliance uncertainties are already affecting markets, logistics, and commercial relationships. Some producers are reported to have added charges on sales to EU markets to cover the costs of EU CATCH compliance. In the case of smaller shipments or products with widespread demand, producers may simply choose to avoid EU markets due to the added reporting costs and risks of products being stranded at ports due to reporting anomalies. A recent case demonstrates the high costs associated with that stranding, as product held on trampers off the coast of an EU member country cost $30,000 per day during a reported 10-day docking delay due to EU CATCH paperwork issues (see Appendix I). In addition to the cost of demurrage, inventory bonds, lost contracts, and customer concerns are driving up costs and disrupting commercial relationships. EU importers, retailers, and consumers will incur these increased costs, or products will be directed to less costly markets. Redirection of products will both increase prices and reduce seafood options for European buyers and consumers.

As designed, EU CATCH cannot achieve its stated intent of reducing IUU fishing. The system is based on a flawed understanding of the relationship between fishery catches and seafood finished products and fails to recognize operational realities of commercial fisheries and seafood production. The Alaska seafood industry supports efforts to deter IUU fishing; however, EU CATCH demands a level of vessel-to-finished-product attribution that is either inaccurate, exceedingly expensive, or impossible to attain.

Conclusion and Recommendations for Policymakers and Regulators

The EU's goal of reducing IUU fishing is shared by the Alaska seafood industry. EU CATCH presents an opportunity to improve international cooperation to combat IUU fishing, but the system must accurately reflect seafood supply chains and collect data that are genuinely relevant to IUU enforcement. Because EU CATCH is built on the premise of ***individual-vessel traceability to every finished product, CATCH creates an appearance of precision that is neither possible nor useful for IUU detection. CATCH does not work to reduce IUU, rather it creates a costly burden for fisheries, and European companies and consumers.***

A workable system addresses risk by considering robustness of government oversight and fishing and seafood traceability. Without changes, EU CATCH functions as a non-tariff barrier that raises costs, delays lawful shipments, discourages full utilization, disadvantages smaller vessels and processors, and ultimately increases costs and reduces seafood choices for European buyers and consumers. The Alaska seafood industry stands ready to work with US and EU authorities, European industry, and other countries to develop a durable system that

advances both effective IUU enforcement and legitimate seafood trade. To achieve these objectives, we present the following recommendations:

Recommendations

1: Align traceability requirements with fishery risk and governance

a. **Create an alternative reporting pathway** for countries with effective domestic fisheries management regimes that include comprehensive licensing, rigorous stock and catch management, monitoring, and enforcement.
b. **Recognize effective government controls.** Allow governments overseeing well managed fisheries to validate exports and use their audit systems to establish legal harvest without requiring every exporter to individually provide fisheries data that already exists in their domestic databases.

2: Fix structural problems with EU CATCH data requirements

a. **Permit aggregation at commercially meaningful control points.** Establish reporting by processing facility identifying dates of production and a list of contributing harvest vessels. In addition, only one vessel identifier (e.g., state license, IMO number, or another unique identifier) should be required with the vessel name.
b. **Eliminate the processing statement requirement.** Only finished product weights are relevant given the lack of predictability of relationships between catch amounts and imported product weights.
c. **Work with the seafood industry and government authorities to build genuine system interoperability.** Establish standardized data formats, bulk uploads, application programming interfaces, test environments, and error-handling protocols, preventing the same information from being entered manually multiple times.

3: Collaborate in designing and testing counter IUU measures

a. **Establish a formal U.S.-EU- government and industry working group.** Facilitate meaningful engagement between the European Commission and all relevant US government agencies and the US and EU seafood industry.
b. **Provide an extension on EU CATCH implementation until rigorous and transparent testing can be done.** Conduct fishery-by-fishery pilot-testing with Alaska harvesters, processors, exporters, NOAA, EU importers, and Member State authorities before imposing permanent requirements.
c. **Detain only the specific product with documentation issues.** Release all portions of consignments whose documentation is complete while errors are resolved, unless authorities identify a specific enforcement basis for holding the entire cargo.

Appendices

Appendix I. Examples of Blocked Shipments

Netherlands Shipments

As a result of chaos and uncertainty relating to EU CATCH implementation, almost 16,000 metric tons of Alaska seafood was stranded in the Netherlands in two different shipments.

> First shipment: Approximately 7,810 metric tons of Alaska seafood was offloaded from M/V Regal Bay between May 8 and May 15, 2026. The Dutch authorities reviewed EU CATCH documentation submitted for seafood product being transported on M/V Regal. Based on that review, they restricted the entire cargo in cold storage and did not permit its entry into commerce until revisions were made that satisfied the Dutch authorities.
>
> Second shipment: Approximately 7,780 metric tons of Alaska seafood was stranded at-sea onboard M/V Italia Stream, which was scheduled to dock on May 23, 2026. The Dutch authorities reviewed EU CATCH documentation submitted for seafood product being transported on M/V Italia Stream. Based on that review they have denied M/V Italia Stream permission to enter Dutch waters and dock. M/V Italia Stream was required to anchor offshore and was not allowed to offload for several days. Once the M/V Italia Stream was allowed to dock and unload, the product was kept in cold storage for several more days.

Estimated Cost

Together, these delays resulted in hundreds of thousands of dollars in direct cost on the Alaska logistics company that operated the vessels. Substantial additional direct and indirect costs accrued to the twelve U.S. companies that had Alaska seafood product on one or both vessels. In each case, the inability to move product to customers presented an acute concern with immediate financial and customer-relationship impacts. Furthermore, the time spent by staff and contractors working with all companies involved had significant implications. The paperwork burdens of filing, changing and refiling paperwork to clear both vessels were unprecedented over many decades of Alaska seafood exports to Europe. ***Although product was ultimately cleared and allowed to enter commerce in Europe, the unnecessary burdens and cost that were imposed are unacceptable and document the need for urgent review and reforms.***

Denmark Shipment

Due to conflicting guidance on compliance with CATCH and processing statements, approximately 600 metric tons (MT) of U.S. seafood in 32 different containers has been held up in Denmark since arriving at the end of April through Sept. 1, 2026. 125 MT of the product has been released since documents were revised and cleared. However, the other 475 MT remains in bonded cold storage while the revised documents have been resubmitted and are in various stages of being reviewed.

In these instances, the containers were shipped on multiple carriers including Global Freight, Maersk, and MSC. It is our understanding that the entire vessels were not held up, but the individual containers were held and moved to bonded cold storage due to the paperwork.

Estimated Cost

Together, these delays have also resulted in hundreds of thousands of dollars of direct bonded cold storage costs. Substantial costs also accrued from fees when resubmitting the paperwork. This has continued to cause concern, straining customer relationships due to the delays in receiving the product. Furthermore, complying with the processing statement requirements in this small vessel and highly processed fishery has led to significant staffing concerns for the U.S. seafood processor and the EU customers. The paperwork burdens of filing, revising and refiling paperwork to clear the containers continue to be unprecedented and have more than tripled certificate costs alone. ***Although companies continue to revise paperwork for in-transit shipments when new guidance or clarification is available, it takes an inordinate amount of staff hours for correct data to be compiled, then several days or weeks for the paperwork to go through the various approval processes, so these containers continue to be held up in bonded cold storage.***

Appendix II. Questions and Concerns Regarding EU CATCH to EU Commission

Council of the European Union

Brussels, 30 March 2026
(OR. en)

7820/26

PECHE 113

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the Agriculture and Fisheries Council of 30 March 2026: On the need for clear improvement and simplification of Union fisheries legislation, in particular the draft weighing provisions - Information from Germany

On the need for clear improvement and simplification of Union fisheries legislation, in particular the draft weighing provisions

Information from Germany

The amended EU Fisheries Control Regulation and the amended regulation on eliminating illegal, unreported and unregulated fishing (IUU Regulation), which have been in force since the beginning of the year, represent a significant increase in bureaucracy and pose massive challenges to economic operators and competent authorities. It now becomes apparent that complying with the new rules means serious struggles to many businesses.

This is contrary to the conclusions of the European Council of 19 March 2026 (EUCO 1/26), which called for rules to be ambitiously simplified and administrative burdens to be reduced.

The Commission's draft for a new implementing act on the weighing of fishery products is a concrete example of the increased burden required by EU law. The requirements for weighing records and weighing systems and the framework for future sampling and control plans are not only disproportionate, but in some cases simply not feasible. Improvements and adjustments are urgently needed.

We have serious concerns about further weakening the competitiveness of the fisheries sector and countering its development towards greater resilience through over-regulation and out-of-touch regulations.

We also see an urgent need for action in other areas where new EU law already applies. This concerns, for example, the IT system ‘CATCH’ and the mandatory catch reporting in recreational fisheries. In this respect, we refer to the letter of February 2026 signed by 18 Member States, and call on the Commission to urgently present effective and tangible simplifications and improvements for the fisheries sector.

Question for written answer E-002481/2026
to the Commission
Rule 144
Piotr Müller (ECR)

Subject: Impact of EU CATCH on Polish and EU fish processors

The EU CATCH system aims to combat illegal, unreported and unregulated (IUU) fishing and improve the traceability of fishery products. There are no doubts as to the aim of the EU CATCH system.

However, the practical implementation of the new requirements for legal raw material from heavily regulated fisheries used by EU importers and fish processors, including those in Poland, is of concern. For example, one lot of wild salmon from Alaska may consist of catches from multiple small vessels and multiple fishing days, which are then pooled before being delivered to the processing plant. The transition period ends on 10 July 2026 – in the middle of a short fishing season, which risks disrupting supply.

I therefore ask:

1. Has the Commission assessed the impact of EU CATCH on Polish and EU fish processors using legal raw fish from fisheries where catches are aggregated before processing?

2. Will the Commission consider introducing alternative means of demonstrating compliance with EU CATCH requirements for such fisheries, with full traceability and monitoring of the legality of catches?

3. Will the Commission extend the transitional period beyond 10 July 2026 to avoid disrupting the supply during the fishing season?

Submitted: 16.6.2026

Question for written answer E-002484/2026
to the Commission
Rule 144
Piotr Müller (ECR)

Subject: Proportionality of EU CATCH requirements for legal raw fish

The Commission is presenting EU CATCH as a tool for digitalisation, harmonising controls and reducing the administrative burden.

In practice, however, the system may have the opposite effect on legal raw fish from low-IUU-risk fisheries if the documentation requirements do not take the specificities of supply based on aggregated catches into account.

This includes wild Pacific salmon, which can be an important raw material for EU and Polish processing plants. One lot may include fish from multiple small vessels and multiple fishing days, which may require a very large number of records to be manually reported.

I therefore ask:

1. Does the Commission consider the current EU CATCH requirements proportionate for low-IUU-risk fisheries, where catches are aggregated prior to being delivered to processing plants?

2. How will the Commission address the allegation that the current requirements may create a de facto administrative barrier to the legal raw material needed for EU processing?

3. Does the Commission intend to introduce simplifications for fisheries with a high level of aggregated catches?

Submitted: 16.6.2026

Council of the European Union

Brussels, 19 June 2026
(OR. en)

10538/26

PECHE 239

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the Agriculture and Fisheries Council on 22 June 2026 Implementability of EU control measures to maintain the competitiveness of the European fisheries market - Information from Germany, supported by Belgium, Croatia, Czech Republic, Estonia, Finland, the Netherlands, Portugal, Romania, Spain and Sweden

Implementability of EU control measures to maintain the competitiveness of the European fisheries market

Information from Germany, supported by Belgium, Croatia, Czech Republic, Estonia, Finland, the Netherlands, Portugal, Romania, Spain, Sweden

Effective fisheries controls and the fight against illegal, unreported and unregulated fishing are an important part of maintaining marine biodiversity and establishing a fisheries economy that works in harmony with nature.

The provisions laid out in the revised EU fisheries control regulation and in the regulation to prevent, deter and eliminate illegal, unreported and unregulated fishing (IUU Regulation) contribute to the sustainable exploitation of European fish stocks. Their gradual entry into force requires the adoption of further delegated and implementing acts with regard to traceability, remote electronic monitoring and monitoring of engine power. We recognise that these measures will be of key importance to the provision of an effective and harmonised approach within the European Union.

The core goal of these specific steps, as well as any further upcoming legislative procedures, must be the retention and improvement of the competitiveness of a sustainable European fisheries sector.

Future legal acts must therefore also contribute to reducing the bureaucratic burden on European companies while improving the practical applicability of the provisions for both economic actors and the relevant authorities alike.

To this end, future legal acts and IT systems should be configured to implement the once-only principle where sensible and to enable the consistent reuse of prior data from existing systems. Special consideration must be given to interoperability. Double work in reporting requirements must be avoided and abolished where possible. Existing systems must be further developed into reliable and user-friendly applications. This includes basic functions, such as an automatic readout and scan functions in CATCH. New digital requirements must be practicable and must in particular take the productive capacity of small and medium sized enterprises (SMEs) into account.

Existing legislation has been found to exert a disproportionate burden on these companies when assessed in practice. This concerns, for example, the rules on permittable margins of tolerance in Article 14 of the revised control regulation. How practical improvements can be targeted in further legislative procedures without undermining the underlying goals of these controls should be reviewed.

The implementation of the revised control regulation and the IUU regulation can only succeed if the legislative framework for enforcement of the compliance standard remains usable in practice. We thus once again emphatically urge the European Commission to credit the key significance of these aspects in future legislative procedures. This especially applies to the upcoming legal acts on traceability, remote electronic monitoring and the continuous monitoring of engine power.