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Cc: North Sea Member States

NSAC Advice Ref. 05-2526
NSAC/NWWAC/MEDAC Advice on the implementation of
the fisheries Control Regulation

This paper was approved with consensus by the NSAC, NWWAC and MEDAC Executive Committees on 6th March 2026 via written procedure.

North Sea Advisory Council (NSAC), North Western Waters Advisory Council (NWWAC) Mediterranean Advisory Council (MEDAC) wish to express serious concerns regarding the adoption and implementation of the new [Regulation \(EU\) 2023/2842](#) on fisheries control.

The ACs share the recent views expressed by the European Association of Fish Producers Organisations (EAPO) in their Joint Press Release¹ and by Member States during the AGRIFISH Council² highlighting that progressive entry into force of Regulation (EU) 2023/2842 is revealing a disproportionate increase in administrative and operational burdens that are not commensurate with actual control risks and contradicts the principles of proportionality, efficiency and effectiveness guiding EU action.

It seems increasingly clear that the new Control Regulation has been adopted without a proper understanding and impact assessment of the negative and disproportionate consequences it will have for seafood production in the North Sea, North Western Waters, as well as in the Mediterranean and other European sea basins. Its practical implications have not been adequately assessed, nor have the cumulative impacts on fishing operations, viability, and supply chains been adequately considered.

The cumulative administrative, technical, and financial requirements associated with the new control measures place a significantly heavier burden on the fisheries sector and specifically small- to medium-scale operators. Rather than improving compliance, these obligations risk undermining the economic viability of the fisheries sector, discouraging new entrants, and

¹ <https://eapo.com/our-work/publications/>

² <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://data.consilium.europa.eu/doc/document/ST-5587-2026-INIT/en/pdf>



accelerating exits of fishers and potential investors. As a result, a regulation intended to strengthen control and sustainability will instead weaken coastal communities and erode the social and economic fabric that fishers sustain.

The ACs particularly concerned about little to no genuine opportunity for the fishing sector to discuss proposed measures. Since the joint-AC workshop on implementation of control regulation in February 2025³, the Commission has still not responded to the list of questions AC members addressed to the regulators regarding the implementation of critical control measures. While we recognise the increasing workload against narrowing timeframes for action, we would nevertheless like to stress that generalized responses to stakeholder advice without a meaningful iterative exchange will not support an inclusive design and effective implementation of control measures. International experience clearly demonstrates that control systems are most effective when they are developed through close cooperation between legislators and the fishing industry. In this case, however, the legislative process has largely excluded industry stakeholders, undermining both trust and the likelihood of successful implementation.

In light of the current geopolitical situation and the growing importance of and demand for food security, the ACs call for corrective actions where measures are proving disproportionate and not operational. Discussions on technical feasibility must take place before measures are proposed in a regulation to avoid significant delays and costs due to unrealistic and unviable provisions.

The ACs and their members wish to contribute constructively to this work. Without a course correction, there is a risk that food production in the North Sea, North Western Waters, as well as in the Mediterranean and other sea basins, will decline further, triggering a domino effect that dismantles critical infrastructure within the fishing sector and leaves the European Union increasingly dependent on imports.

We urge the Commission to reconsider its approach and to engage meaningfully with the sector to ensure that fisheries control measures are workable, proportionate, and supportive of a resilient European fishing industry.

³ <https://www.nwwac.org/listing/multi-ac-workshop-on-the-control-regulation.5234.html>