



**Opinion of the European Economic and Social Committee**

**Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2017/2107 laying down management, conservation and control measures applicable in the Convention area of the International Commission for the Conservation of Atlantic Tunas (ICCAT), Regulation (EU) 2018/975 laying down management, conservation and control measures applicable in the South Pacific Regional Fisheries Management Organisation (SPRFMO) Convention Area, Regulation (EU) 2019/833 laying down conservation and enforcement measures applicable in the Regulatory Area of the Northwest Atlantic Fisheries Organisation, Regulation (EU) 2021/56 laying down management, conservation and control measures applicable in the Inter-American Tropical Tuna Convention, Regulation (EU) 2022/2056 laying down conservation and management measures applicable in the Western and Central Pacific Fisheries Convention Area, Regulation (EU) 2022/2343 laying down management, conservation and control measures applicable in the Indian Ocean Tuna Commission (IOTC) Area of Competence, and Regulation (EU) 2023/2053 establishing a multiannual management plan for bluefin tuna in the eastern Atlantic and the Mediterranean**

(COM(2025) 195 final – 2025/0106 (COD))

(C/2025/5154)

Rapporteur: Javier GARAT PÉREZ

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|-----------------------------------------------|-------------------------------------------------------------------------------|
| Advisor                                       | Daniel VOCES DE ONAÍNDI                                                       |
| Legislative procedure                         | EU Law Tracker                                                                |
| Referrals                                     | European Parliament, 16.6.2025<br>Council, 19.5.2025                          |
| Legal basis                                   | Articles 43(2) and 304 of the Treaty on the Functioning of the European Union |
| European Commission documents                 | COM(2025) 195 final                                                           |
| Relevant Sustainable Development Goals (SDGs) | SDG 14 – Life below water, SDG 16 – Peace, justice and strong institutions    |
| Section responsible                           | Agriculture, Rural Development and the Environment                            |
| Adopted in section                            | 25.6.2025                                                                     |
| Adopted at plenary session                    | 16.7.2025                                                                     |
| Plenary session No                            | 598                                                                           |
| Outcome of vote<br>(for/against/abstentions)  | 187/2/5                                                                       |

**1. RECOMMENDATIONS**

The European Economic and Social Committee (EESC)

1.1. considers it necessary for the conservation and control measures adopted by Regional Fisheries Management Organisations (RFMOs) to be transposed into EU law. It is essential to harmonise these measures in order to ensure that management measures in the field of international fisheries are effective;

1.2. supports the Commission proposal, pointing out that the EESC has consistently expressed support for similar initiatives in previous opinions (NAT/757 <sup>(1)</sup>, NAT/796 <sup>(2)</sup> and NAT/865 <sup>(3)</sup>). In addition, it calls for the measures taken by RFMOs to be transposed efficiently and coherently into the body of EU law, respecting the principles and objectives of the common fisheries policy and avoiding overlaps or inconsistencies between regulations;

1.3. in line with the objectives of the Competitiveness Compass, firmly supports the need to move towards further simplifying regulations, effectively reducing the administrative burden, and speeding up procedures. It welcomes the initiative of this omnibus proposal, which is a step in the right direction. It considers that these measures must help to increase the EU's competitiveness and to facilitate and speed up entrepreneurial activity;

1.4. believes that any transposition must be carried out with regard for institutional loyalty and with full transparency. It must be carried out faithfully and to the letter, without the EU adding obligations that have not been agreed for its own fleet, thus protecting the competitiveness, sustainability and legal certainty of the European fisheries sector;

1.5. underlines that the current proposal lacks an efficient mechanism to automatically transpose certain rules adopted by RFMOs, as already pointed out in opinion NAT/865. The current system requires regular amendment of regulations by means of lengthy and complex legislative procedures, with the result that it takes longer to transpose international standards effectively;

1.6. warns, once again, that pursuing the route of a regulation could lead to conflicting rules or, at the very least, periods of legal uncertainty for administrations and even businesses themselves, which are uncertain as to whether they are required to comply with the previous rules – those still in force in the EU – or with the new RFMO rules. Furthermore, it can generate distortion in the application of measures with regard to non-EU fleets;

1.7. reiterates its recommendation to explore the feasibility of establishing a fast-track procedure allowing certain technical measures adopted by RFMOs to enter into force immediately by means of a mechanism for automatic transposition subject to conditions. This system would allow those measures to be implemented in EU law without the need for a specific legislative act, provided that no objections are raised by the European Parliament or the Council within a pre-determined period. Such a mechanism would make EU action more effective internationally, while ensuring respect for the principles of legality, legal certainty and democratic oversight;

1.8. calls on the Commission, in line with the United Nations Convention on the Law of the Sea (UNCLOS) and the New York Agreement on the Conservation and Management of Straddling and Highly Migratory Fish Stocks, to step up cooperation and coordination with all countries whose fleets exploit these stocks, both through bilateral frameworks and within Regional Fisheries Management Organisations (RFMOs). The Committee stresses the importance of ensuring a level playing field, through the uniform application of conservation and management rules, avoiding any double standards that could harm European operators committed to complying with international standards.

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<sup>(1)</sup> Opinion of the European Economic and Social Committee on 'Proposal for a Regulation of the European Parliament and of the Council laying down conservation and control measures applicable in the Regulatory Area of the Northwest Atlantic Fisheries Organisation and repealing Council Regulation (EC) No 2115/2005 and Council Regulation (EC) No 1386/2007' (COM(2018) 577 final – 2018/0304 (COD)) (OJ C 159, 10.5.2019, p. 60).

<sup>(2)</sup> Opinion of the European Economic and Social Committee on 'Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2019/833 of the European Parliament and of the Council of 20 May 2019 laying down conservation and enforcement measures applicable in the Regulatory Area of the Northwest Atlantic Fisheries Organisation' (COM(2020) 215 final – 2020/95(COD)) (OJ C 429, 11.12.2020, p. 279).

<sup>(3)</sup> Opinion of the European Economic and Social Committee on the Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2019/833 laying down conservation and enforcement measures applicable in the Regulatory Area of the Northwest Atlantic Fisheries Organization (COM(2022) 51 final — 2022/0035 (COD)) (OJ C 290, 29.7.2022, p. 149).

## 2. EXPLANATORY NOTES

### *Arguments in support of recommendation 1.1*

2.1. The EESC agrees that there is an urgent need to transpose ICCAT, NAFO, SPRFMO, IATTC, WCPFC and IOTC decisions <sup>(4)</sup> in order to:

- ensure good ocean governance and management of marine resources;
- comply with the EU's international obligations;
- ensure a level playing field for the European fishing fleet.

2.2. The EESC points out that the proposal does not cover fishing options.

### *Arguments in support of recommendation 1.2*

2.3. The Committee believes that the transposition procedure is still not based on an efficient mechanism, as these measures are amended every year and the EU's bureaucratic procedures are very slow, causing a continuous time-lag between the rules adopted by RFMOs and EU legislation. The time gap in the transposition of international measures is clearly reflected in the case of the IATTC, where the resolutions adopted since 2021 have yet to be transposed, calling into question the EU's regulatory capacity to react. This highlights the need to make the legislative process more efficient in order to ensure timely delivery of international commitments and to preserve the credibility and coherence of the common fisheries policy.

## 3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

### Amendment 1

linked to recommendation 1.7

| Text proposed by the European Commission | EESC amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          | <p><b><i>Single additional provision – Mechanism for automatic transposition of certain RFMO measures</i></b></p> <ol style="list-style-type: none"> <li><b><i>1. In order to ensure the timely implementation of measures adopted by Regional Fisheries Management Organisations (RFMOs) to which the EU is a contracting or cooperating party, the Commission may transpose certain technical measures by means of a mechanism for automatic transposition subject to conditions.</i></b></li> <li><b><i>2. To that end, the Commission shall publish in the Official Journal of the European Union, no later than 30 days after an international measure has been adopted, notification of the adoption of the measure, specifying its content, date of entry into force and legal compatibility with EU law.</i></b></li> </ol> |

<sup>(4)</sup> The International Commission for the Conservation of Atlantic Tunas (ICCAT), the South Pacific Regional Fisheries Management Organisation (SPRFMO), the Northwest Atlantic Fisheries Organisation (NAFO), the Inter-American Tropical Tuna Commission (IATTC), the Western and Central Pacific Fisheries Commission (WCPFC) and the Indian Ocean Tuna Commission (IOTC).

| Text proposed by the European Commission | EESC amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|                                          | <p>3. <i>The measure shall be deemed to be applicable in EU law under the following conditions:</i></p> <ul style="list-style-type: none"> <li><i>a) minimum catch sizes,</i></li> <li><i>b) temporal or spatial closures,</i></li> <li><i>c) fishing effort limits,</i></li> <li><i>d) specifications of fishing gear,</i></li> <li><i>e) marking or identification requirements,</i></li> <li><i>f) control and monitoring measures.</i></li> </ul> <p><i>Excluded measures are those which:</i></p> <ul style="list-style-type: none"> <li><i>a) require institutional or budgetary adjustment,</i></li> <li><i>b) involve targeted penalties being applied,</i></li> <li><i>c) are in conflict with basic provisions of EU law,</i></li> <li><i>d) affect fundamental rights.</i></li> </ul> <p>4. <i>In the absence of a reasoned objection from the European Parliament or the Council within 60 days of the publication of the notification, the measure shall be deemed to be automatically transposed and mandatory for EU operators to apply.</i></p> <p>5. <i>The Commission shall specify the:</i></p> <ul style="list-style-type: none"> <li><i>a) full text of the measure,</i></li> <li><i>b) date of entry into force laid down by the RFMO,</i></li> <li><i>c) preliminary assessment of legal compatibility with EU law.</i></li> </ul> <p>6. <i>In the event of an objection, the Commission shall, without delay, issue a legislative proposal, delegated act or implementing act, as appropriate, to transpose the measure in accordance with the ordinary legislative procedure.</i></p> <p>7. <i>The Commission shall report annually to the Parliament and the Council on the application of this regulation, including a list of measures transposed, objections received and possible conflicts of interpretation.</i></p> <p>8. <i>No later than five years after the entry into force of this regulation, the Commission shall issue an evaluation report, accompanied, if appropriate, by a legislative proposal for revising it.</i></p> |

**Reason**

To establish a fast-track procedure that would allow certain technical measures adopted by RFMOs to enter directly into force through a mechanism for automatic transposition subject to conditions.

Brussels, 16 July 2025.

*The President*  
*of the European Economic and Social Committee*  
Oliver RÖPKE

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