

Costas Kadis
Commissioner for Fisheries and Oceans

Brussels, 22 January 2026

Subject: Urgent concerns regarding the implementation of the Fisheries Control Regulation (EU) 2023/2842 – Call for a Delegated Act and exemptions for small-scale and artisanal fisheries

Dear Commissioner Kadis,

On behalf of the European Transport Workers' Federation (ETF), representing the voice of fishers across Europe, I am writing to express our deep concern regarding the practical application of the new Control Regulation (EU) 2023/2842, which entered into force earlier this month.

While we share the objective of sustainable resource management, the current interpretation and enforcement of these new rules are placing an unbearable strain on crews. Our affiliates report us from the Member States that the new administrative norms act as a direct attack on the coastal fleet, prioritizing bureaucracy over practical fisheries operations and safety of human life at sea.

We urgently request the European Commission to issue a **Delegated Act** to modify and clarify the application of these rules in Member States and to strictly **exempt small-scale coastal fisheries** from these disproportionate requirements.

Our members report that the current implementation is creating operational chaos and severe psychosocial risks. The critical issues are as follows:

- 1. Violation of labor standards and safety risks.** An administrative rule cannot supersede the safety of crews. The increased digital administrative burden subtracts essential time from navigation and rest, directly increasing the risk of accidents. Our affiliates warn that these new demands violate the work and rest limits established by ILO Convention 188, European directives, and national Occupational Risk Prevention laws.
- 2. The “Zero Tolerance” reporting (1kg vs. 50kg Threshold)** The elimination of the 50kg threshold and the obligation to declare catches from the first kilogram is operationally unfeasible for the following reasons:
 - 1. Workload:** It significantly increases the physical workload regarding sorting on board.
 - 2. Liability:** It multiplies the likelihood of estimation errors, exposing workers to disproportionate sanctions for minor discrepancies, particularly regarding by-catch with no commercial value.
 - 3. Unworkable prior notification rules:** the requirement for prior notification (ranging from 2.5 to 4 hours depending on interpretation) is "operatively

impossible" for the coastal fleet. Many vessels fish in grounds less than two hours from port. Under the new rules, crews would be forced to wait at sea, "doing circles in the water" unnecessarily, delaying their return home and cutting into their rest time. We demand real flexibility adapted to the effective navigation distance of each vessel.

3. **Electronic logbook frequency (Per Haul vs. 24h).** Moving from a 24-hour declaration cycle to a requirement to record data after *every fishing operation* interrupts the workflow. Crews may not have finished sorting the catch before the trawl must be hauled again. This forces crews to work even faster to avoid infractions, increasing stress, psychosocial risks, and the likelihood of physical accidents.
4. **AIS and Data Privacy** While intended for safety, the mandatory use of AIS is being converted into a control tool that de-anonymizes vessels. This exposes commercially sensitive fishing grounds to competitors who do not know the area, directly impacting the remuneration of local crews and creating conflict at sea.

The cumulative impact of these bureaucratic constraints, combined with existing pressures such as closed areas (e.g., West Med) and marine mammal interactions, is driving fishers to despair and causing an exodus from the profession. The EU must not suffocate its fishers; it must provide a future vision that supports food sovereignty rather than undermining the attractiveness of the sector.

We refuse to allow the voice of workers to be ignored in a regulation that so drastically affects their working conditions and life on board.

Consequently, we urge the Commission to issue a Delegated Act to modify and clarify the practical implementation of these rules and introduce the necessary flexibility and to exempt small-scale and artisanal fisheries, often considered the fisheries more at risk in the EU, from disproportionate administrative burden and regulations.

Yours sincerely,



Juan Manuel Trujillo Castillo
ETF Fisheries Section Chair