



Ms. Charlina Vitcheva
 Directorate-General for Maritime Affairs and Fisheries
 European Commission
 Rue Joseph II, 99B-1000
 Brussels, Belgium

03 November 2025

Subject: Towards improved consultation with Advisory Councils and stakeholders on Control Regulation

Dear Ms Charlina Vitcheva,

The North Western Waters Advisory Council (NWWAC), the Baltic Sea Advisory Council (BSAC), the Pelagic Advisory Council (PelAC), the Outermost Regions Advisory Council (CC RUP), the North Sea Advisory Council (NSAC), the South Western Waters Advisory Council (CCS), would like to express their concerns about the implementation of the revised “Control Regulation” (Regulation (EU) 2023/2842 of the European Parliament and of the Council). As per previous communications and through their continuous involvement, the ACs stand ready to assist in the quest for effective and efficient control and enforcement. However, the ACs noted a lack of a timely and adequate space for constructive dialogue and consultation being given to the ACs and other stakeholders in developing the Delegated and Implementing Acts at Commission and Member State level. This became apparent to ACs members during the recent public consultation which the European Commission opened from 15 July to 12 August 2025 on the “*Commission Delegated Regulation (EU) .../...of 27.8.2025 supplementing Council Regulation (EC) No 1224/2009 by laying down rules on the control of fisheries and on the surveillance and inspection of fishing activities, enforcement and compliance*”. The draft Delegated Regulation was later adopted by the Commission on 27 August 2025. Similar concerns have been expressed regarding the public consultation on the Draft “*Commission Implementing Regulation (EU) .../...of XXX laying down detailed rules for the implementation of Council Regulation (EC) No 1224/2009 as regards access to waters and resources, control of fisheries, surveillance, inspection and enforcement, deduction of quotas and fishing efforts, data and information, and repealing Commission Implementing Regulation (EU) No 404/2011*”, which ran from 28 July to 25 August 2025.

The consultation period for both acts coincided with the summer recess, severely limiting the ability of the members of these ACs to participate meaningfully. The extremely short four-week consultation window, coupled with the highly technical nature of the legislative text and its interaction with various related rules, created a situation in which operators and stakeholders could not fully assess or respond to the proposed measures. This lack of meaningful



consultation has been observed across multiple submissions by different ACs members who managed to submit their feedback. The ACs recognise the time-bound elements embedded in the Control Regulation and acknowledges the Commission's position that no additional amendments were considered necessary in the Delegated Regulation, as outlined in the specific reasons provided in the final text. However, the ACs would welcome further analysis on the inclusion, or lack thereof, of stakeholder feedback collected during the consultation period in the drafting of the final Delegated Regulation. Additionally, insufficient suitable conditions to enable meaningful engagement increases the risk of regulations being introduced that lack specific input from operators and other stakeholders, which can result in implementation at sea that is not appropriately adequate or efficient.

Additionally, the ACs note that the Commission has proceeded with further measures without appropriate and impactful engagement with the ACs. These include provisions on the weighing of fishery products, the weighing and sampling of landings, new requirements on the digitisation of transport documentation, as well as measures related to the introduction of REM and engine power. Moreover, there is a concern regarding the difficulty of ensuring a level playing field in the implementation of this legislation across the different sea basins. Furthermore, meaningful assessments evaluating costs, time, and effort required for the implementation of proposed control measures have not been forthcoming.

At the Multi-AC workshop on Control Regulation¹, that was held in February 2025 with the Commission, a range of issues including those covered by this Delegated Regulation were raised by a number of different stakeholders at the meetings. Despite the Commission engagement, the ACs members noted that many issues were not comprehensively dealt with and in fact with limited consultation due to the limited time more questions were raised and are yet to be answered. Furthermore, following the workshop and based on the discussion held, the NWWAC, PelAC and NSAC developed an Inter-AC advice². This was submitted to the Commission on 23 May 2025 and the ACs still have not received a reply. ACs members have observed little evidence that the contributions provided during the process were reflected in any changes or adjustments to either the Delegated or the Draft Implementing Regulations.

Additionally, the ACs regret that members request for dedicated meetings to discuss the detailed provisions of the draft Delegated and Implementing Acts was not taken forward.

In conclusion, the ACs recognise and welcome the efforts of the Commission towards ensuring stakeholders engagement and acknowledge that effective and robust controls are essential to ensure sustainability and food security, protecting fish stocks while supporting Europe's stable supply of safe, low-carbon protein. At the same time, the ACs emphasise that effective stakeholder input is essential to make such controls workable and proportionate, in order to maximise compliance and trust with the sector and other interested parties.

¹ <https://www.nwwac.ie/listing/multi-ac-workshop-on-the-control-regulation.5234.html>

² [Joint NWWAC, PelAC and NSAC Advice on the implementation of the EU Fisheries Control Regulation](#)



The ACs further recognise that Member States share responsibility with the Commission in creating opportunities for consultation and play a particularly important role, given their responsibility for implementing the Control Regulation. For this reason, the ACs call for the improvement and establishment of adequate fora and circumstances for meaningful consultation. In this regard, regional and/or sectoral stakeholder workshops involving the regional Member States' control expert groups, with active engagement from the Commission, would be essential. Such fora would help achieve a shared objective: a well-implemented Control Regulation that is cost- and resource-efficient, adapted to practical implementation at sea and in ports, responsive to regional and sector-specific conditions, and ensuring a level playing field. The ACs therefore underline the importance of adopting a more bottom-up approach, with genuine consideration of stakeholders' knowledge and experience, to ensure that future measures are both effective in meeting policy objectives and practical to implement in diverse fisheries contexts.

Yours sincerely,

BSAC – Jarosław Zieliński

CCRUP – Ruben Farias

NSAC- Kenn Skau Fischer

NWWAC – Alexandra Philippe

PelAC - Esben Sverdrup-Jensen

CC SUD - Sergio López