2026 EU CATCH Certificate System:

Impacts to Alaska and US Seafood Exporters, and EU Importers

April 20, 2026

Issue

As currently implemented, the EU CATCH system imposes data and reporting requirements that are operationally infeasible for Alaska's fisheries, ***creating a trade barrier equivalent to a ban*** *on many* ***Alaska seafood exports to the EU***.

Request

Representatives of the Alaska seafood industry respectfully request that EU and US officials:
1) Extend the current grace period beyond July 10, 2026, to allow for meaningful system adjustments;
2) Develop alternative compliance, such as allowing aggregation to the processing facility level, for highly regulated fisheries with fully accounted catches.

Contact

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- Ministers/Administrations of EU importers' respective Member States

Issue Summary

The EU's new digital CATCH certification system introduces harvest vessel traceability requirements that are incompatible with Alaska fisheries, where catches are routinely aggregated across vessels and tenders to maintain quality and efficiency. Some shipments would require several thousand data entries, imposing prohibitive costs on exporters and importers alike. Without modifications, these requirements risk halting a substantial portion of US seafood exports to the EU—despite Alaska fisheries being among the most rigorously managed and transparent in the world.

Issue Impacts

In January, the EU issued new catch certificate requirements for import of products from wild capture fisheries into the EU, to prevent import of illegal, unreported and unregulated (IUU) products. Alaska's unique fishery operations were not considered in the development of the new digital EU CATCH system; as a result, the EU CATCH system ***effectively creates a trade barrier equivalent to a ban on much of Alaska's seafood entering the EU***. These issues arise despite full catch accounting and oversight of Alaska fishery harvests.

The primary issue is the requirement for each entering shipment to provide traceability of each harvest vessel landing's contribution to each product by weight (including vessel identifier and date of landing). To make Alaska's products high quality and competitive, we have adopted several operational practices that aggregate and disaggregate catches from a number of vessels, particularly in small vessel (under 100') fisheries, that make the proposed traceability requirements infeasible.

- In many Alaska fisheries, catches are consolidated on tenders for delivery to the plant. In some cases, over 100 vessels will contribute to a single tender offload. In addition, partial loads are consolidated among tenders to ensure timely delivery and product quality, and tender capacity remains available to vessels that continue to fish.

- To ensure the greatest yield from catches, ancillary products (e.g., roe, milt, bellies, collars, etc.) are also produced. Tracing these products back through the delivery stream to specify each harvest vessel's contribution is nearly an insurmountable task, and the operational, labor, and data entry cost for which would make those products commercially prohibitive.

- Products are often sold to secondary processors in non-EU countries (including the US) that are uncertain of the final market for their production. To maximize value, any secondary processor will need the option of selling its production to an EU final market. Consequently, all sales that are not to final markets (including sales to US secondary processors) need to comply with the EU traceability requirements to remain competitive in the market.

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 level, the shipment would still **require** several hundred records**,** each requiring separate certification and manual data entry into the EU system. ***This level of reporting transforms a single shipment into what is effectively a full supply chain audit, creating costs that exceed the commercial value of the product.***

Several secondary, largely technical issues arise in compliance with new requirements, such as a requirement for a captain's signature for each vessel that contributed product to a shipment. NOAA Fisheries is working to address these technical issues, however, that will not resolve the overarching issue that arises from the demand for vessel-level traceability of all shipments entering the EU. Compliance will make Alaska products increase costs effectively driving Alaska products out of the EU market.

Alignment with other sectors: The EU CATCH certification system is effectively a full supply chain audit for every single shipment of seafood products entering the EU that goes far beyond that required of other industries. In other regulated sectors, such as agriculture, auditing pools production to a single operational unit, such as a farm. This pooling is equivalent to pooling at a processing facility, which derives its inputs from a single source harvested by a group of fishermen. As currently implemented, the EU rule is equivalent to requiring a farm to identify its production to the ranch hand or picker.

Background

In 2008, the European Union (EU) passed its Illegal, Unreported, and Unregulated (IUU) fishing regulations and associated catch certification requirements. A negotiated administrative arrangement between the EU and the United States (US) established a process for compliance through NOAA Seafood Inspection Program issuance of a legal harvest certificate that identified the harvest source. In 2019, the EU updated its IUU fishing regulations and associated new digital CATCH certification system, and NOAA was notified in 2025 that the administrative arrangement would end, and US exporters would have to comply with the new digital EU CATCH system.

Recognizing the challenges associated with compliance, the EU wisely adopted a transition period starting January 10, 2026 which will end on July 10, 2026. While the transition is intended to allow importers and exporters to adapt to the system, several new elements (such as fishing vessel name and license details, call sign, and the name and signature of the vessel captain) required in the EU CATCH system[2,3] will prevent the importation of seafood into the EU from some Alaska fisheries. A template of the EU Catch Certificate is available in Annex II of this link. (Fresh water species and aquaculture products are exempt from the CATCH system.)

Impact

If implemented as currently structured, the EU CATCH system is expected to **disrupt or halt a substantial share of U.S. seafood exports to the EU**, including key Alaska products such as salmon, pollock, and fish oil.

The Alaska Seafood industry sees several challenges in implementing this new EU CATCH system, particularly for small vessel fisheries (i.e., less than 100') and companies that re-process seafood. ***If implemented as currently required, much of Alaska seafood imports into the EU would be halted.***

Direct imports into the EU of wild harvest US seafood totaled over $1 billion in 2025 according to data compiled by the McKinley Research Group (Table 1). Indirect imports into the EU of wild harvest US seafood (re-processed in other countries) totaled approximately $0.5 billion in 2025 (Table 2). While the actual impact on EU imports of US seafood due to these changes is unknown at this time, it is believed that nearly all US Pacific salmon and fish oil products - estimated at more than $300 million in 2025 - would be halted. Additionally, significant amounts of pollock, cod, and other species and products, could be similarly halted, depending on handling, transfer and processing procedures.

The administrative cost of these new regulations will lead US exporters to shipping products elsewhere, rather than the EU, despite those products being legal, high quality, and fully traceable to the fishery. These regulatory burdens would likely disproportionately impact smaller businesses.

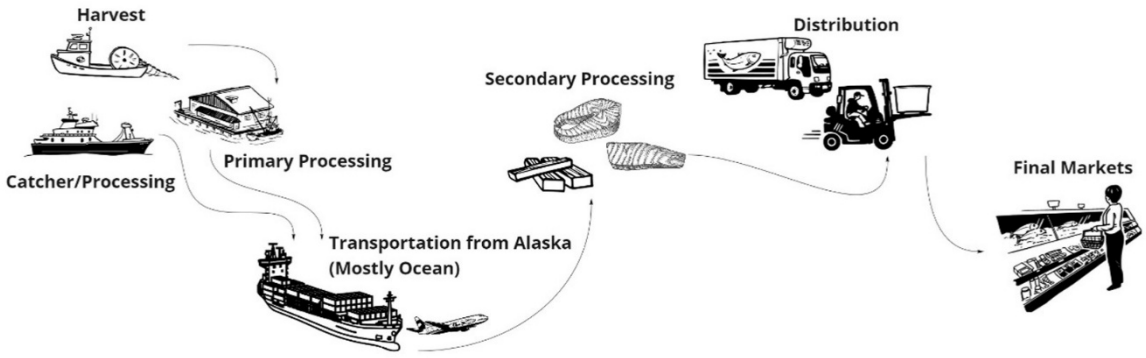
Co-mingling on Vessels

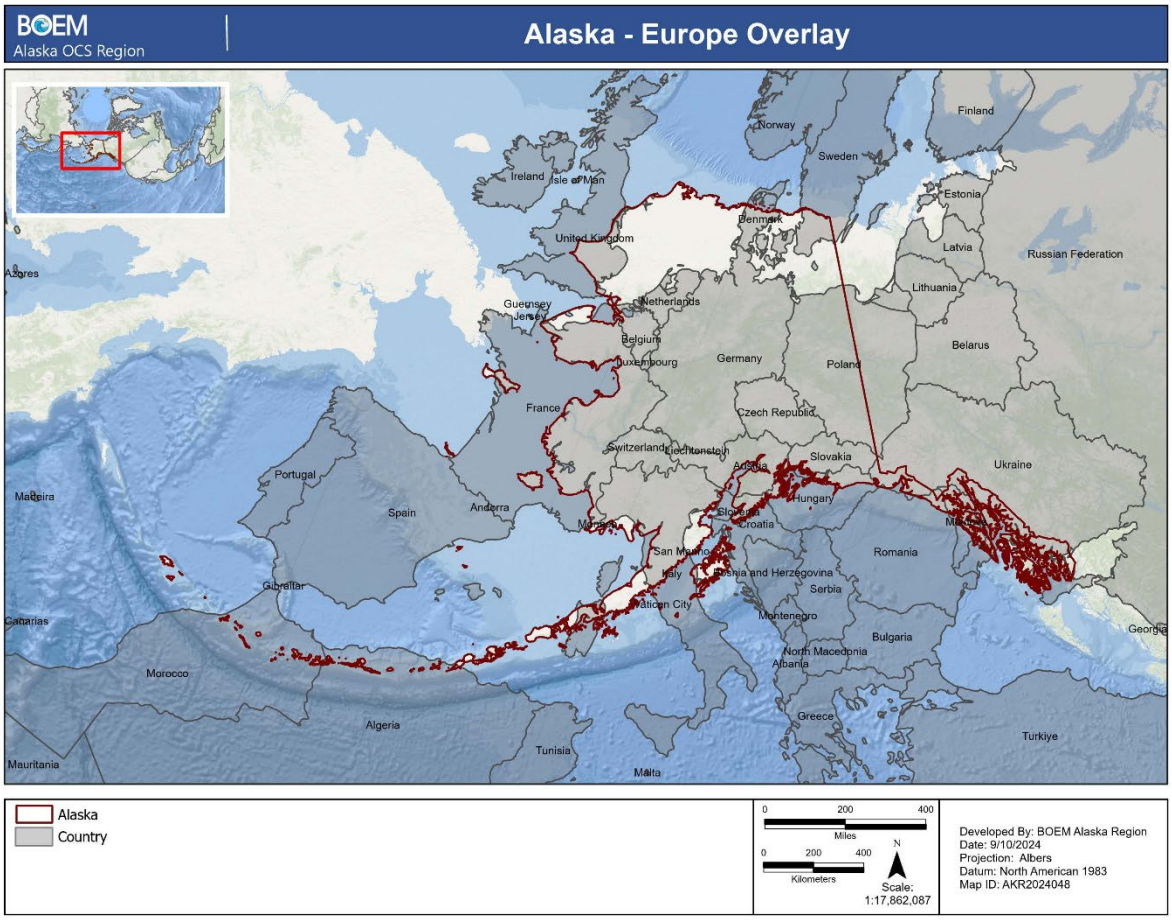
In some fisheries, fish from multiple fishing vessels is co-mingled when loaded onto and transported by tender vessels to the processing facility onshore. In the Alaska salmon fishery, in which approximately 8,000 commercial fishermen harvest approximately 500-600 million pounds of salmon in three months, processing companies operate dozens of tender vessels simultaneously, each taking deliveries from many fishing vessels, sometimes over 100 per tender. With some deliveries as small as a few hundred pounds, deliveries must be consolidated on tender vessels. Further aggregation and disaggregation of catches occurs as product quality is improved by tenders transferring catch to other tenders for delivery to the plant more quickly than each tender independently traveling to and unloading at the shoreside plant. These transfers also ensure that tenders are available on the grounds and reduce fuel consumption. Fish cannot be efficiently segregated by fishing vessel when making these transfers and offloads.

The Alaska seafood industry similarly operates tenders in highly remote whitefish fisheries where catches from multiple vessels are consolidated on the tender vessel. These fisheries may go unharvested (and processing communities may go without processing) without these tender operations, because of their remoteness.

Co-mingling at processing facilities

Co-mingling also occurs at primary processing plants and secondary processing plants for both salmon and whitefish. Tracing bellies, collars, fish oil and other ancillary products to the vessel would also be infeasible. These ancillary products are typically a small percentage of the total production that must be consolidated at the plant over the course of many vessel deliveries for packing.





US fisheries are fully verified

Alaska fisheries are **globally recognized as low risk for IUU fishing**, supported by comprehensive digital catch accounting and robust state and federal oversight and enforcement.

Alaska fisheries digital catch management system tracks all fish harvests to the vessel, accounting for all catches for management and oversight purposes. The diligent oversight and enforcement of this system by state and federal agencies removes IUU and conservation concerns for any fish traceable to Alaska primary processing facilities.

The traceability requirements of the new EU CATCH system will have no benefit (fishery management, conservation, or otherwise) but will come at the high cost of reduced fish quality and severely increased operational and reporting costs. Some fisheries are unlikely to attain optimum yield if all production must be traced and reported to the specific harvest vessel, or even to a specific tender vessel.

Table 1. European Union Seafood Imports from the United States ($millions), 2024-2025

Product Description	HS Code	2024 Value	2025 Value
Alaska Pollock Fillets	03047500	$281	$372
H&G Sockeye Salmon	03031100	$91	$121
Alaska Pollock Surimi	03049410	$73	$76
Live Lobsters	03063210	$71	$55
Pacific Whiting Fillets	03047419	$59	$50
Frozen Pacific Salmon Fillets	03048100	$29	$50
Fish Roe, Livers, And Milt	03039190	$17	$36
Frozen Shrimp	16052190	$30	$30
Other Surimi	03049510	$28	$27
Frozen Flatfish Fillets	03048390	$23	$27
H&G Pacific Cod	03036390	$19	$26
Minced Alaska Pollock	03049490	$11	$25
Frozen Squid	03074333	$17	$18
H&G Pacific Salmon (Non-Sockeye)	03031200	$17	$16
H&G Flatfish	03033985	$10	$12
Pacific Cod Fillets	03047110	$5	$11
All Other Products		$95	$100
Total seafood imports from U.S.		**$877**	**$1,053**

Source: Eurostat via Trade Data Monitor, compiled by McKinley Research Group

Table 2. EU Imports of Select Seafood Products from Select Reprocessing Markets by Product and Exporter ($millions), 2024-2025

Description / Trade Partner	HS	2024	2025
Alaska Pollock Fillets	**3047500**		
China		$129	$116
South Korea		$1	$1
Frozen Salmon Fillets (Atlantic and Pacific)	**3048100**		
China		$120	$112
Frozen Flatfish Fillets	**3048390**		
China		$64	$74

Frozen Pacific Cod Fillets	**3047110**		
China		$41	$78
Indonesia		$2	$3
Breaded/Battered Fish	**16041991**		
United Kingdom		$43	$54
China		$1	$2
Smoked Pacific Salmon	**3054100**		
United Kingdom		$33	$29
Minced Alaska Pollock	**3049490**		
China		$2	$2
South Korea		$0	$0
Prepared Caviar Substitute	**16043200**		
Ukraine		$3	$4
Canned/Pouched Salmon	**16041100**		
China		$5	$6
Thailand		$3	$3
Frozen Whole/H&G Flatfish	**3033985**		
Ukraine		$3	$4
Total Value of Selected Products Imported from the United States and Key Reprocessing Markets		**$450**	**$488**

Source: Eurostat via Trade Data Monitor, compiled by McKinley Research Group
Note: Columns may not sum to totals and subtotals due to rounding.

Current Actions Underway

The Alaska seafood industry is working toward compliance with the new EU CATCH system. However, as we better understand the complexity and vast amounts of data that are required by this new system, we are increasingly concerned that the consequences may not fully appreciated, and that solutions will not be timely; If not addressed, a substantial share of the seafood trade between the US and the EU will halt. We are working to communicate our concerns to US agencies, EU agencies and EU seafood importers as described below.

NOAA continues to engage with the EU on negotiated solutions to the implementation challenges of the new digital CATCH requirements, while also advocating for additional time to avoid disruptions of exports. NOAA is hosting webinars (April 16 and April 30) to help US seafood exporters better understand what is needed for compliance.

US seafood exporters are working with their EU customers and partners to better understand the challenges and work towards solutions. Members of Congress, as well as the National Economic Council, have been alerted to the problems and are engaged in finding solutions.

Seafood Europe is also advocating for negotiated solutions that will not halt seafood imports into the EU beginning July 10, 2026.

Conclusion

Alaska fishery participants, managers, and stakeholders fully support the objectives of the EU CATCH system to prevent IUU fishing and reduce fraud. However, achieving these goals requires a **practical approach** that reflects the operational realities of large-scale, remote fisheries. With additional time, reasonable adjustments can be adopted to maintain both the integrity of the EU market and continued access to high-quality, responsibly harvested Alaska seafood.

References

1. FAQs: What is New in the EU CATCH Certification Scheme After the Amendment of the EU IUU Regulation and of the EU IUU Implementing Regulation (webpage)
2. NOAA Fisheries Update on EU Catch Certificate Requirements (webpage)
3. EU Catch Certificate and Re-Export Certificate Template (webpage)

General Resources:

European Commission webpage on illegal fishing (webpage)
NOAA Fisheries European Union Certification Requirements (webpage)
Social Responsibility Onboard Commercial Fishing Vessels in Alaska (webpage)
Map of Alaska overlaid onto Europe (webpage)