



EUROPEAN FEDERATION OF THE TRADE
IN DRIED FRUIT, EDIBLE NUTS, PROCESSED FRUIT & VEGETABLES
& PROCESSED FISHERY PRODUCTS



Stopping IUU fish from entering the EU

Towards EU-wide database for fish imports

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ABOUT FRUCOM



- **Non-profit international association** established 1960
- **Officially recognized by EU Institutions**
- **Represents European traders** in dried fruit & nuts, processed fruit & vegetables & **seafood**
- **Specialized in trade, food safety, sustainability, customs, nutrition** for our sectors
- **Members in EU and supplying countries**

General comments

- Appreciate the approach by the EU Commission to use the experience of DG SANTE/TRACES for creating IUU certificates e-scheme
- Also, transparency/communication by DG MARE with the sector to explain the future system/allowing for test period
- Companies are interested in smooth trade

Operators' feedback

- Uptake by our members is limited at the moment
- At the moment, receive paper documents, check, verify, send to authorities
- Members support the objectives of EU proposal, with conditions
- Must become as TRACES for health certificates
- Important that third countries also start using it
- Otherwise, all data input needs to be done by importer: impact on workload
 - How to “clone” the data, without the need to import from start?



Example import process into the EU: a letter of credit

- The operator typically gets the electronic documents 1-2 weeks before arrival into EU port.
- Sometimes receives draft documents when the bill of lading is issued on departure of the vessel from origin.
- The operator pays against receiving the originals of the documents.
- Receives bill of lading, health+catch certificate, sends to authorities, gets authorisation.
- If the electronic system could warn the operator very early, ideally when the shipment is being prepared for sending, that something is wrong with the consignment, it would be best, to prevent the goods from leaving the port at origin, unnecessary transportation, costs and losses for the operator.

Liability/practical issues

- Which is the importers' liability? How can importers, mostly SMEs, check that all is ok and there is no overshooting of quantity?
- The importer needs to see if there is a problem with the catch certificate the sooner the better.
- With IUU certificate, if the system is intended for the whole chain starting with the vessel master, the number of people involved will be higher, with more issues potentially.
- Some technical practical issues pop up in the system and will need solving – how will this be set up?
 - Examples: in TRACES, issues with seafood mixes, where the system does not accept various species, or some origin countries are not using some parameters of the system = needlessly time consuming at import



Thank you!
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