



Joint NGO priorities on the revision of the EU Fisheries Control System

October 2018

We call on decision-makers **to support** the Commission's proposal to:

- Introduce Remote Electronic Monitoring (REM) requirements to improve the control of fishing activities at sea, in particular the control of the landing obligation (LO), and require full documentation of all catches and discards (Articles 1 (11) and 1(23) of the proposal);
- Introduce measures that would allow for a better implementation of the enforcement provisions of the Control Regulation (Article 1 (69), Annexes III and IV);
- Mandate the use of tracking devices and electronic reporting of catches and fishing operations for small-scale fishing vessels (Articles 1 (6), 1 (11) and 1 (12));
- Improve the control of recreational fisheries by introducing licencing and reporting systems (Article 1 (44));
- Strengthen current traceability provisions to ensure effective tracking of seafood along the supply chain (Articles 1 (11), 1 (46), 1 (54) and 1 (56));
- Improve the control of fishing capacity, notably by mandating the continuous monitoring of engine power for certain categories of vessels (Articles 1 (33) to 1 (37));
- Enlarge the scope of the current provisions on the control of fishing restricted areas to cover all vessels and areas in the high seas and in third countries' waters (Article 1 (43));
- Replace the paper-based catch certificate scheme with an electronic scheme under the European Union's Regulation to prevent, deter and eliminate illegal, unreported and unregulated fishing (EU IUU Regulation) (Article 4 (6)).

We call on decision-makers **to amend** the Commission's proposal to:

- Mandate the use of REM on board all vessels identified by the European Fisheries Control Agency (EFCA) as being of medium, high and very high risk of non-compliance with the LO;
- Introduce measures that would allow the effective control of technical measures, in particular measures set out to minimise the impact of fishing activities on the marine environment;
- Complete the list of serious infringements of the rules of the Common Fisheries Policy (CFP);
- Improve data access and sharing, including for data on catches, landings, vessel positions and enforcement actions; and establish an EU Fisheries Control Data Centre;
- Introduce transparency requirements by making information on the implementation of the Control Regulation, such as infringements and sanctions, publicly available;
- Provide a clear definition of traceability and include key missing data elements in the EU IUU Regulation catch certificate (International Maritime Organization (IMO) number, catching method and link between catch area and catch dates);
- Ensure that the revised mandate of EFCA fully incorporates the international dimension of the CFP into its work and that it receives the adequate resources to fulfil its missions.

1. Ensure full compliance with the landing obligation

Around 1.7 million tonnes of fish and marine life were discarded in EU fisheries each year before 2011.¹ The reformed CFP introduced the landing obligation (LO) to eliminate this wasteful practice of returning unwanted catches to the sea, and to fully document all catches. Despite the serious environmental need and very broad public support for this policy, a paucity of effective monitoring and control at-sea is leading to broad scale non-compliance including substandard catch reporting.

We therefore support the Commission's proposal to introduce, applying a risk-based approach, Remote Electronic Monitoring (REM), especially to monitor and control the implementation of the landing obligation, and call for it to be strengthened to:

- **Clarify that the compulsory requirement to use REM systems (CCTV recording systems and net sensors) will apply to EU fleet segments identified by EFCA as being of medium, high and very high risk of non-compliance with the landing obligation;**
- **Increase monitoring capacity and powers of inspectors at-sea to quantify the amount of discards and gather clear evidence on compliance, or the lack thereof, with the landing obligation.**

In addition, current catches under 50kg do not need to be recorded. This exemption not only seriously impacts the scientific information available for stock assessments and the objective of achieving fully documented fisheries management as foreseen in Article 15 (1) of the Common Fisheries Policy, it also significantly reduces the controllability of the adherence to the LO at sea. It has been highlighted by the Scientific, Technical and Economic Committee for Fisheries (STECF) that the current scope of obligations needs to be expanded to improve resolution in terms of catch reporting, inclusion of vessels not currently covered, and information at an individual operational level, such as per haul.²

We therefore support the Commission's proposal to require full documentation of all catches and discards for all vessels.

2. Adapt the general control framework to the control of technical measures

The EU fishing fleet needs to apply technical rules to ensure that it complies with Union legislation. The current Control Regulation does not ensure controls for rules that have been set to minimise the impact of the fisheries on the environment such as accidental catches of marine mammals, marine reptiles and seabirds.³ This includes obligations or measures such as the application of acoustic devices, streamers, spatial-temporal restrictions, and gear modifications. The current regulation also fails to ensure that inspectors have sufficient training, capacity and resources to be able to enforce the rules. Furthermore, the current legislation does not apply a fallback option in emergency cases where sanctions are not sufficient to stop destructive fishing practices.

¹ COM (2011). Commission Staff Working Paper Impact Assessment *accompanying the document* Commission proposal for a Regulation of the European Parliament and of the Council on the Common Fisheries Policy.

² Scientific, Technical and Economic Committee for Fisheries (STECF) – 46th Plenary Meeting Report (PLEN-14-02). 2014. Publications Office of the European Union, Luxembourg, EUR 26810 EN, JRC 91540, 117pp.

³ For a list of the current legislation applicable, as of June 2018, see: https://ec.europa.eu/fisheries/cfp/fishing_rules/technical_measures_en. In addition, see also the proposal for a Regulation of the European Parliament and of the Council on the conservation of fishery resources and the protection of marine ecosystems through technical measures, COM (2016) 134.

For example, the current rules require EU vessels to install mitigation measures on board against the accidental catch of sensitive species. In the areas where such a technical measure is in place, lack of implementation of these measures by vessels should be sanctioned as a serious infringement. Fishing activities can have irreversible impacts on the marine environment if rules are not properly applied and controlled. By-catching in fishing gear sensitive species that are protected under the Birds and Habitats Directives⁴ is illegal. The survival of several species such as the critically endangered Balearic shearwater and the vulnerable Loggerhead sea turtle depend on the strict implementation of fishing rules.

However, the Commission's proposal fails to ensure that technical measures will be controlled and enforced. As a result, inspectors on vessels will not need to check if those vessels are complying with EU rules relating to minimising their impact on the marine environment. It also means that if vessels are breaking fishing management rules, there will not be any sanctions against them. In addition, the Commission is not empowered to close areas to some fisheries if a Member State does not respect its obligations to implement technical measures for these fisheries.

Therefore, we recommend that:

- **The regulation specifically includes control and enforcement provisions for EU vessels on the implementation of technical measures for conservation of fishery resources and the protection of marine ecosystems;**
- **A serious infringement is created to sanction licence holders and masters for not fulfilling the obligations to mitigate against the accidental catches of sensitive species;**
- **The Commission is empowered to prohibit fishing activities if technical rules have not been implemented and sanctions have not been sufficient to stop destructive fishing;**
- **The new regulation explicitly states that inspectors shall be trained and well-resourced to ensure that they can enforce the rules, including mitigation rules applied to fishing vessels to limit accidental catches of sensitive species; such as placement of acoustic devices and streamers as well as testing the sink rate of weighted hooks.**

3. Maintain and improve the EU legal framework for enforcement and sanctions

Even though the Control Regulation has been in place since 2010, there are very few Member States that have issued sanctions that are effective and dissuasive. The number of sanctions imposed for infringements is low, and the level of these sanctions does not meet the criteria set in the Control and IUU Regulations. In 2017, the Commission itself recognised that *“enforcement, especially concerning sanctions and point system, follow up of infringements [...] are the areas that show the biggest shortcomings”*.⁵ The continuous lack of political will from Member States to implement the enforcement provisions of the Control and IUU Regulations, as well as the absence of strong action from the Commission to address this issue, are the roots of the problem.

⁴ Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds and Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

⁵ Commission Staff Working Document SWD (2017) 134 Final, p.18.

The Commission's proposal moves the enforcement provisions of the IUU Regulation into the new Control Regulation, opening up the current sanctioning system for revision. This has been done without a proper online public consultation or without making public an impact assessment or a study on the effectiveness of the current sanctioning system. It is also unclear how the Commission and the Member States will address the gaps in implementation of these provisions, alongside the revision of the Control Regulation.

In order to create a culture of compliance, it is key that the current provisions on the penalty point system, serious infringements, immediate enforcement measures and accompanying sanctions are strengthened, not weakened. We therefore recommend supporting the Commission's proposal on these aspects.

The proposal distinguishes between infringements that are serious by nature, and other serious infringements of the CFP, whose seriousness should be assessed according to a list of criteria set in the regulation. In addition, it proposes to use mandatory administrative sanctions in case of serious infringements and sets minimum levels of fines for those. It further clarifies the rules applicable to the penalty point system and makes explicit that any point assigned by the coastal state has to be enforced by the flag State.

In addition to these provisions, we recommend changing the list of serious infringements as follows:

- **Add *"turning off Automatic Identification System (AIS) transmitters"* to the list - if turned off for a legitimate reason such as piracy, the captain of a vessel should notify the flag State and/or the coastal state;**
- **Amend the serious infringement *"supplying services to operators connected to a vessel engaged in IUU fishing"* to *"benefitting from, supporting or engaging in IUU fishing including as operators, effective beneficiaries, owners, logistics and service providers, including insurance providers and other financial service provider"*;**
- **Add a serious infringement for licence holders and masters of fishing vessels who are not fulfilling their obligations to mitigate against the accidental catches of sensitive species.**

4. Mandate the use of cost-efficient tracking devices and the electronic reporting of catches and fishing operations for small-scale vessels

Monitoring of all fishing vessels, regardless of their length or type of gear used, is key to ensure that fishing activities in EU waters are environmentally sustainable and managed in a way that is consistent with the objectives of the CFP. Small-scale fisheries are critical in supporting the livelihoods of coastal communities and play an important role in sustainable development, but they are not necessarily a synonym for low impact fisheries. Their operations therefore need to be properly assessed, monitored and controlled to guarantee that their impacts are accurately accounted for, especially as 89% of the EU fleet – responsible for 25% of the catches – currently does not have a vessel monitoring system on board.⁶

In this context, the installation of small and cost-efficient tracking devices on board – recent advances in technology have made these devices small and cost-effective, and they do not undermine the safe

⁶ European Court of Auditors, Special Report No 08/2017 : *EU fisheries controls : more efforts needed*, p. 8.

operation of the vessels and gears – to automatically locate and identify small-scale (under 12 meters) vessels' position is essential. **We therefore support the Commission's proposal to extend the use of a vessel position data system to small-scale fishing activities.**

Under current legislation, vessels below 10m are not required to record fishing logbook data or complete a landing declaration indicating their catches. This poses a serious threat to the quality of stock assessments, as smaller vessels are also responsible for the catching of significant quantities of fish, and without the appropriate information on the amount of catches, it is not possible to achieve the objectives of the CFP. **In this regard, we support the Commission's proposal to introduce an accurate and complete electronic fishing logbook to record small-scale vessels' operations, including details of all catches by species, category, type and gear used.**

5. Improve the control of recreational fisheries

The Commission's proposal to introduce a registration or licencing system for recreational fishers and collect data on their catches is an important step towards the sustainable management of fisheries, especially for those species and stocks subject to a recovery plan. Very few assessments have been undertaken on recreational fishing activities in terms of their socio-economic importance and environmental impacts. Recent scientific studies have estimated that marine recreational fishing represents 2 to 72% of total catches, depending on the stock and the region.⁷

Recreational fishing can bring conservation and socioeconomic benefits if properly regulated. It can represent an important force for the conservation of aquatic biodiversity through increasing awareness, as well as provide resources for the development of coastal areas. The licencing process should therefore not only monitor the number of persons involved in recreational fishing activities, but also ensure that recreational fishers are well aware of the legislation in place, the species subject to a recovery plan and the scientific rationale behind it.

Moreover, the obligation to report catches when stocks are subject to conservation measures is an essential element to obtain greater accuracy on the status of fish stocks and a clear assessment of the share of catches from recreational fisheries in relation to commercial fishing and should therefore be supported by decision-makers. Reporting of catches could be done in several different ways, but preference should be given to electronic methods, which is particularly relevant for those recreational vessels fishing species subject to a recovery plan. The fishing mortality data reported by recreational activities should then be taken into account when estimating the quota allocation to the commercial sector.

In addition, we recommend that decision-makers ensure that the Control Regulation clearly underlines that recreational catches need to be coherent with the multi annual and recovery plans. For this to be effective, some measures are required to control recreational mortality (e.g. minimum landing sizes, gears and catch limitations, or restricted areas and times). This should take place in parallel with effective monitoring, control and surveillance schemes, which ensure that Member

⁷ Hyder, K., Radford, Z., Prellezo, R., Weltersbach, MS., Lewin, WC., Zarauz, L., Ferter, K., Ruiz, J., Twonhill, B., Mugerza, E., and Strehlow, HV., 2017, Research for PECH Committee, *Marine recreational and semi-subsistence fishing – Its value and its impact on fish stocks*, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels.

States are regularly monitoring the catch effort of recreational fisheries and incorporate this information in their fisheries resources management schemes.

6. Improve traceability requirements

Making fisheries products traceable from point-of-catch to final point-of-sale is a necessary precondition to combatting illegal, unreported and unregulated (IUU) fishing, achieving sustainable fisheries and healthy fish stocks, and safeguarding the livelihoods of fisheries-dependent communities worldwide. This is particularly pivotal in key markets such as the EU, which is the leading seafood market in the world and imports over 60% of its seafood, mostly from developing countries.

While EU food safety regulations and best practices obligate a degree of traceability for health, safety and consumer purposes, they do not provide an adequate framework for ascertaining that products were caught legally. The Control Regulation has, up until now, also fallen short in adequately providing this framework.

The European Commission has taken important steps toward rectifying some of the traceability loopholes in their proposal, including:

- **Mandating the electronic exchange of seafood traceability information along the supply chain via electronic traceability systems;**
- **Mandating the tracking of lots of seafood along the supply chain through product transformation, merging and transport;**
- **Ensuring that adequate information is passed along the supply chain to ascertain the legality of EU-caught products.**

Some key loopholes, however, remain and we recommend that the following are addressed:

- **Providing a clear definition of traceability in the Regulation so that traceability requirements for control purposes can be distinguished from labelling requirements for transparency to the consumer;**
- **Ensuring that sufficient information is also passed along the supply chain to ascertain the legality of imported seafood products. This requires mandating the inclusion of key data elements for traceability purposes in the catch certificate that is required to be provided under the EU IUU Regulation, including the unique vessel identifier (IMO number), the catching method, and a clear link between catch area and catch dates.**

7. Improve data management and sharing

Many exceptions, gaps and discrepancies currently exist in the collection, sharing and reporting of EU fisheries data.

One of the primary problems identified is that EFCA and the Commission do not have access to data on a continuous basis. The Commission receives relevant data from the Member States, notably on catches, quota use, fishing effort and fishing fleet capacity. However, it does not have authorisation to analyse it without requesting an authorisation from the relevant Member State. EFCA receives information from Member States on the fleets engaged in the region covered by a Joint Deployment Plan but not on a structural basis. Another major deficiency relates to data quality - significant

discrepancies in catch data reported by Member States to the Commission, as well as significant unexplained discrepancies exist between declared landings and the quantities recorded as sold. In a 2017 report, the European Court of Auditors also found that Member States do not sufficiently share and trace information concerning activities of EU-flagged vessels when fishing in the waters of another Member State, and that the Commission is aware of the problem.⁸

We support the Commission's proposal to tackle some of these data deficiencies and discrepancies by:

- **Removing the exemptions for vessels under 15 meters allowing them to not declare their landings at all (vessels under 10 meters) or to provide their landing declarations in paper instead of electronic format (vessels between 10 and 15 meters);**
- **Removing the exemption which allows vessels up to 15 meters to not have a Vessel Monitoring System (VMS) on board;**
- **Requiring Member States to set up a system that allows the Commission as well as EFCA to access fishing activity data and enforcement information (i.e. national register of infringements) at all times and without prior notice, in a non-aggregated format;**
- **Allowing scientific bodies of Member States to have access to vessel position data;**
- **Establishing a direct electronic exchange system for Member States to exchange fisheries information (i.e. vessel position data, electronic logbooks, landing declarations, sales notes and inspection and surveillance reports);**
- **Requiring information on conversion factors used to be included in logbooks as well as landing or transshipment declarations;**
- **Mandating the weighing of fishery products to take place on landing, on systems and by operators approved by the competent authorities.**

The Commission fails, however, to propose the establishment of an EU-Fisheries Control Data Centre (FCDC) as suggested by the European Court of Auditors, for an integrated European information system for fisheries management. Data on fishing and enforcement activity should be available in near real time in a digital database that would allow direct electronic exchange between Member States' authorities and Commission services. EFCA should also have access to this database for analysis and control purposes. In addition, non-EU countries should also obtain access to parts of this EU-wide database if this is mandated by a Sustainable Fisheries Partnership Agreement to which they are a contracting party.

To strengthen the Commission's proposal, we recommend to:

- **Establish an EU Fisheries Control Data Centre or an EU-wide database accessible to Member States, the Commission and EFCA;**
- **Ensure that the Commission and/or EFCA has access to real time vessel position data;**
- **Improve the standardisation of time intervals for communication of data, as well as other relevant data fields, between Member States;**
- **Grant access to relevant vessel position data from the EU-wide database to non-EU countries if this is mandated by a Sustainable Fisheries Partnership Agreement to which they are a contracting party;**

⁸ European Court of Auditors, Special Report No 08/2017 : *EU fisheries controls : more efforts needed*, p. 8.

- **Establish harmonised and EU-wide guidelines and systems that assist authorities in the cross-checking of catch and landing data, including standardised conversion factors.**

8. Ensure the monitoring and control of fleet capacity

Monitoring and control of fleet capacity is essential to ensure that national capacity ceilings set in Annex II of the CFP are respected.⁹ The ceilings found in Annex II are expressed in both gross tonnage (GT) and kilowatts (kW). The current Control Regulation puts an obligation on Member States to control their fishing capacity, but the system now in place is quite ineffective. In its 2017 report, the European Court of Auditors itself noted that *“the Member States we visited did not sufficiently verify the accuracy of their fleets’ capacity and of the information on the vessels in the fleet register”*.¹⁰

As a result, the Commission is now proposing to improve the control of fishing capacity, notably by mandating the continuous monitoring of engine power on board vessels which use trawls, seines and surrounding nets. **We recommend that decision-makers support provisions that improve control on fishing capacity.**

9. Effectively control fishing restricted and marine protected areas

In order to secure and restore favourable conservation status in marine sites affected by fishing activities, including marine Natura 2000 areas, Article 11 of the CFP gives to an “initiating Member State” the right to propose restrictions, such as spatial or temporal closures, to all Member States that have a “potential fisheries management interest” in this site. In addition, the different EU fisheries technical measures regulations, as well as agreements made under Regional Fisheries Management Organisations (RFMOs) subsequently transposed into EU legislation, set out certain area closures aiming at biodiversity conservation. To control and monitor fishing activities in these restricted areas, the current Control Regulation, in Article 50, establishes that vessels of 12 meters’ length or more entering into these areas shall be controlled by Member States with a vessel monitoring system that detects and records their transit through the area. The frequency of data transmission shall be at least once every 30 minutes when a fishing vessel enters a fishing restricted area.

While we welcome the Commission’s proposal to extend the scope of Article 50 to all vessels - irrespective of their size - and to fishing areas located in the high seas or in third countries’ waters we consider it essential to shorten the current 30-minute interval for the frequency of data transmission, so as to guarantee an effective protection of these sites.

10. Introduce transparency requirements

Access to data on the implementation of the Control Regulation is difficult. Member States have to submit a report to the Commission every five years, in which they provide details on the steps they have taken to implement the rules (including aggregated data on sanctions and penalty points), but these reports are not public, and not prepared at sufficiently frequent intervals. This has not always

⁹ Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy.

¹⁰ European Court of Auditors, Special Report No 08/2017 : EU fisheries controls : more efforts needed, p. 7.

been the case; as before 2009 and the entry into force of the current Control Regulation, the Commission reported regularly to the European Parliament and to the Council on this topic, and the information contained in these annual communications was public. It should be noted that, besides the information contained in the implementation reports of the Member States, data on infringements and sanctions is also kept in the non-public national registers of infringements of the rules of the CFP that Member States have an obligation to maintain.

The Commission's proposal fails to remedy this lack of transparency and does not increase the frequency of the reports that Member States have to transmit to the Commission on the application of the Control Regulation. It nevertheless improves the scope and quality of the data that has to be kept in the national registers of infringements in that they should include up-to-date information on suspected and confirmed infringements. As a result, Member States would now be in a position to quickly provide aggregated data on their enforcement actions.

Transparency is essential to assess if the Control Regulation is effectively implemented across the EU. Having access to up-to-date, public and reliable data on this topic will help civil society organisations and decision-makers to inform their views about the challenges that are met in the implementation of the rules and to propose meaningful ways forward. It will also ensure that stakeholders have trust in the system by making information on enforcement accessible, and thus contribute to the much-needed establishment of a culture of compliance across the EU.

We therefore recommend that:

- **Member States report every 2 years on the implementation of the Control Regulation, based on aggregated data from their national registers of infringements, and that these reports are automatically published on the Commission's website. In addition, we also recommend that the Commission use the information submitted by the Member States to prepare bi-annual communications to the European Parliament and to the Council on the implementation of the enforcement provisions of the Control Regulation;**
- **Member States annually publish aggregated data on the number and types of inspections, number of infringements detected and reported, and type of follow-up actions (simple warnings, administrative sanctions, criminal sanctions, immediate enforcement measures, number of penalty points administered).**

11. Minimise the amendments to the EU IUU Regulation by staying within the scope of the Commission's proposal and by strengthening only those provisions opened for review

The EU IUU Regulation is the most progressive anti-IUU legislation of its kind. It is widely recognised as one of the most important and effective tools in driving fisheries reforms globally and improving fisheries governance in non-EU countries and, therefore, contributing to fish stock health, food security, and livelihoods of vulnerable coastal communities.

Regrettably, the Commission has taken the decision to propose changes to the IUU Regulation without holding a proper consultation or carrying out an impact assessment on the subject. These changes are limited to articles that deal with the catch certificate and sanctions for infringements, but the hasty

revision process poses a real and significant risk to the regulation. It is therefore key that amendments to the EU IUU Regulation strengthen this piece of legislation and do not weaken it.

More specifically, we recommend supporting:

- **The digitisation of the catch certification system.** Electronic catch certificates as well as the introduction of an EU-wide IT system for their processing, will provide a decisive means to improve seafood import controls and verifications and harmonise these practices among Member States, as well as bring added transparency into supply chains in a cost, labour and time-effective manner;
- **The mandated use of the new IT tool.** A mandated use of the new IT tool is required to ensure the effectiveness and success of the tool. As few Member States already have a system in place to analyse catch certificates, the Commission should provide support to ensure the interoperability of the IT system with existing national systems.

12. Revise the European Fisheries Control Agency (EFCA) mandate

We consider that EFCA has an important role to play in the implementation of the external dimension of the CFP, especially relating to the IUU Regulation. We would therefore support the revision of EFCA's mandate in order to fully incorporate this international dimension into its activities. EFCA is also key to ensure the effective implementation of the Control Regulation, and its activities related to data analysis, exchange and coordination between Member States should be expanded.

We call on decision-makers to ensure that EFCA is given the appropriate resources to fulfil its mandate. In addition, we recommend that the following activities are included in EFCA's mandate:

- **A more defined and active role in the dialogue with third countries on IUU fishing, by way of increased and more steady support to DG MARE missions, and an extended capacity-building programme for third country officials;**
- **An expansion of EFCA's role in research and data analysis carried out prior to missions in third countries, as well as data analysis for EU waters;**
- **The assessment of an expansion of MARSURV in the future to cover third countries.**

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