QUESTIONNAIRE to be used for biennial reporting on the application of the IUU Regulation

Reporting period 2016-2017 (deadline for submission 30 April 2018)

Member State:	UK
Organisation:	Marine Management Organisation
Date:	30 th April 2018
Name, position and contact details of responsible official:	Nick Mynard – Senior Marine Officer, IUU Team
May the Commission	n provide a copy of this questionnaire to other Member States?
Yes:	x

Please state your notified authorities under the IUU Regulation in accordance with:

Article 15.2 (exportation of catches): Marine Management Organisation, Marine Scotland, UK Fisheries Monitoring Centre (UKFMC)

Article 17.8 (verification of catch certificates): Marine Management Organisation, Marine Scotland, Department for Agriculture, Environment and Rural Affairs and UK Port Health Authorities

Article 21.3 (re-exportation): Marine Management Organisation

Article 39.4 (nationals): Marine Management Organisation

Section 1. Information on legal framework¹

Since the last reporting exercise covering the period 2014-2015, has your country adopted/modified national law or any administrative guides for the application of Council Regulation (EC) No 1005/2008 on illegal, unreported and unregulated fishing (IUU Regulation)?

□Yes ⊠ No

¹ This section 1 is to be filled-in by all Member States i.e. coastal and landlocked Member State.

Section 2. Information on administrative organisation²

2.1. Does your country have different authorities/services to deal with the implementation of the IUU Regulation?

⊠Yes □ No

2.2. If different authorities/services are involved, please distinguish between:

• the control of direct landings of third country fishing vessels:

The Marine Management Organisation (MMO) for landings into England and Wales

Marine Scotland for landings into Scotland

Department of Agriculture, Environment and Rural Affairs (DAERA) for landings into Northern Ireland

• validation of catch certificates upon exports:

The Marine Management Organisation (MMO) IUU Team run the UK Catch Certificate Centre and validate applications for catch certificates for exportation. The MMO will process the application verifying catches made by English and Welsh vessels and refer to Marine Scotland (MS) for Scottish vessels and to the Department of Agriculture, Environment and Rural Affairs (DAERA) for vessel flagged to Northern Ireland to check the compliance of their vessels on each application. The UK catch certificate is validated by the MMO (and only if the vessel trips are compliant once a response has been received). Marine Scotland and the MMO verify and validate their respective flagged vessels that land direct into a 3rd country. However Marine Scotland do verify and validate applications for English flagged vessels out of hours and at weekends.

• verification of catch certificates for imports under direct landing:

There are direct landings at Scottish and English ports. These are checked and validated by the authority that administers that port.

• verification of catch certificates for imports arriving by other means than fishing vessels (e.g. by containers, trucks):

3rd country catch certificates that accompany imports of fishery products via containerised freight, air or trucks are checked and validated by UK Port Health Authorities. There are 17 within the UK that implement the IUU Regulation at the UK border.

² This section 2 is to be filled-in by all Member States i.e. coastal and landlocked Member State.

• validation and verifications of re-exports.

The MMO have dealt with all re exports since the IUU Regulation came into force.

a) internal co-operation (between local/regional authorities and headquarter):

The UK has three functional administrations for the implementation of the IUU Regulations; England and Wales, Scotland, and Northern Ireland. The overarching competent authority for the UK is the MMO reporting to the Department for Environment Food and Rural Affairs (Defra). The main functions have been split between Marine Scotland and the Marine Management Organisation (MMO).

co-operation with other authorities and allocation of tasks for various authorities in the implementation of the IUU Regulation (Fisheries, Health, Customs, Coast Guard, Navy, etc.)

Cooperation, coordination & allocation

Enforcement responsibility at the border is allocated to Port Health Authorities, inshore fisheries & conservation authorities (IFCAs), and the MMO/Marine Scotland & DAERA. Working in parallel with the UK Customs these bodies all form part of the UK's delivery partnership. From time to time this partnership involves Trading Standards officers and the National Food Crime Unit of the UK Food Standards Agency.

Roles, responsibilities and powers

These are set out in **The Sea Fishing Order of 2009 (IUU order No 3391)** for England and Wales and **The Sea Fishing (IUU Fishing) (Scotland) Order 2013.** UK Crown Dependencies (Isle of Man, and Bailiwicks of Jersey and Guernsey) are part of the EU customs union and IUU functions are administered on their behalf by the MMO IUU team. UK Overseas Territories are regarded as third countries.

The MMO Illegal Unreported Unregulated (IUU) Fishing Team

The team is sub divided into the UK Catch Certificate Centre (UKIUUCCC) and the MMO UK Single Liaison Office (UKIUUSLO).

Port State Control: Marine Scotland

The UK **Fisheries Call Centre** (UKFCC) is based with Marine Scotland in Edinburgh that deal with direct landings of 3rd Country vessels. The UKFCC receive all third country fishing vessel notifications and allocate them to the appropriate administration.

Imports: Port State Control and import controls on third country fishing vessel landings

The **UK Catch Certificate Centre** is responsible for the verification of import catch certificates accompanying third country fishing vessel landings into England whereas landings into Scotland are administered by Marine Scotland. Prior to providing the necessary IUU import clearance to Customs an inspection may be carried out on a risk managed basis. The **Port State Control** inspection functions are carried out either by warranted officers in the MMO IUU team or coastal officers working for other UK administrations at any UK IUU

designated port. Imports will not be cleared until the inspectors are satisfied and they have liaised with the IUU Catch Certificate Centre that all is well. Wales and Northern Ireland do not receive any direct third country landings.

Imports: Validation of UK freight imports: Port Health Authorities Enforcement Officers

At the UK border Port Health officers are responsible for the administration of veterinary and health controls for food imports from third countries and for the validation of certification for consignments notified for import.

The Customs Authorities are responsible for ensuring that consignments within the scope of the Regulation are not cleared for import until the results of the verification have been confirmed and provide IUU release forms to our Customs authorities to allow the goods to be imported.

Documentary and physical inspections of all IUU containerised or air freighted imports are carried out (for third country imports excluding fish from a European Economic Area (EEA) or a European Free Trade Association (EFTA) country), to ensure that the documentation is valid and relates to the consignment presented. More in-depth documentary checks are carried out on a risk basis.

Fish from EEA or EFTA countries are not routinely subject to physical inspections (as veterinary controls are not required) however, catch certificates are subject to verification.

The Port Health Office is the first point of contact for the submission of IUU documents (catch certificates, article 14(1) and 14(2) documents). Port Health Authorities are empowered under the national legislation to enforce the IUU regulation and specific powers are in place to reject consignments, and controlling the movements of consignments under detention at the border.

Port Health officers carry out informal verifications with importers/exporters where necessary, and will refer more complex queries or Article 17(6) verifications to the UK Single Liaison Office. These are then dealt with by the MMO IUU Team.

Exports: Validation of UK freight exports

The **UK Catch Certificate Centre** is responsible for the validation of **all** UK catch certificates for catches exported as freight to 3rd countries. Compliance checks are conducted on all UK catch certificate applications. The responsibility for these checks lies with the administration where the vessel is registered. Therefore the MMO check English flagged vessels, Marine Scotland check Scottish flagged vessels and DAERA for those flagged to Northern Ireland.

Exports: Validation of UK landings into third countries

The MMO and Marine Scotland conduct compliance checks on their own respective flagged vessels. The only exception to this is that Marine Scotland conduct checks on English flagged vessels out of hours and at weekends via the UKFMC.

Mutual Assistance

The **UK Single Liaison Office** (SLO) is the first point of contact for official IUU communications with the Commission, other Member States SLOs, other third country enforcement authorities and stakeholders in respect of verifications, investigations, Mutual Administrative and Legal Assistance and general queries. The SLO is also used for communications with other UK departments, external agencies and international organisations. The SLO is responsible for informing Port Health officers and MMO regional offices of any serious issues with regards to compliance of third countries and their vessels. Mutual Assistance Requests and other intelligence reports are communicated to Port Health officers in the form of UK Alerts. Port Health officers in turn communicate any import queries or risks regarding countries or importers to the SLO who then communicate concerns to the Commission and Other Member States SLOs. Marine Scotland administers their own Mutual Legal Assistance.

b) how many officials are involved in the implementation of the catch certification scheme?

For containerised freight and there are 17 Port Health Authorities that implement the IUU Regulation at the UK border. Staff numbers at each port vary from 1 Port Health Officer at the low risk border points to 23 individuals at the Port of Felixstowe who deal with the most IUU document checks in the UK. The exact combined number is not known though.

The MMO IUU Team consists of 5 staff members, of these there is 1 person who maintains the Catch Certificate Centre for applications for UK catch certificates for export and 3rd country catch certificates for direct landings into English and Welsh ports. There are 3 people responsible for the day to day business as usual and 1 area manager.

Marine Scotland have 9 people that deal with direct landings for 3rd country vessels.

There are 2 people that are involved in the verification of UK catch certificate applications at the Department of Agriculture, Environment and Rural Affairs (DAERA) for vessels flagged to Northern Ireland.

Do the authorities of your country have the possibility to audit/verify a company for the purposes laid down in the IUU Regulation?

 \boxtimes Yes \Box No

If yes, which and how many audits/verifications have they undertaken since the last reporting exercise covering the period 2014-2015? Please detail the results:

No audits during this period.

2.3. Does your country have freezones/freeports³ in which activities relevant to importation/exportation/processing of fishery products are authorised?

 \Box Yes \boxtimes No

³ https://ec.europa.eu/taxation_customs/business/customs-procedures/what-is-importation/free-zones_en

Section 3. Information on direct landings and transhipments of fishery products by third country fishing vessels⁴ (including information on port inspections and infringements)⁵

3.1. Does your country have designated ports for direct landings or transhipment operations of fishery products and port services of third country fishing vessels (Article 5 of the IUU Regulation⁶)?

 \boxtimes Yes \Box No

If yes, please list your country's designated ports (including ports designated under Regional Fisheries Management Organisations requirements) and answer to questions 3.2. to 3.7.:

There are 20 designated ports. They are:

Aberdeen

Dundee

Falmouth

Fraserburgh

Grangemouth

Greenock

Grimsby

Hull

Immingham

Invergordon

Kinlochbervie

Leith

⁴ Fishing vessels as defined in article 2.5 of the IUU Regulation

⁵ This section 3 refers to Chapter II (Articles 4 to 11) of the IUU Regulation and is applicable to coastal Member States. Landlocked Member States should not fill in this section.

⁶ Please note that ports designated under Regional Fisheries Management Organisations must also be designated under the IUU Regulation with restrictions if necessary (species etc.)

Lerwick

Lochinver

Methel

Peterhead

Plymouth

Scrabster

Stornoway

Ullapool

3.2. How many landings and transhipments in designated ports of third country vessels have been recorded by your country between 1 January 2016 until 31 December 2017? How many inspections has your country carried out and how many infringements have been detected?

2016

*Use ISO Alpha-2 country codes

Inspections of third country vessels in Member States ports (2016)						
Type of	Vessels	Figures	Flag of the third country vessel(s)*			
operation	vesseis	(2016)	NO	FO	AG	Total
	Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Solution Sol	Number of landings	232	26	10	268
SD		Number of inspections	14	3	0	17
Landinç		% of inspections / landings	6%	11.5%	0%	6.34%
		Number of infringement s	1	0	0	1
Transhi pments	Non-EU vessels using MS	Number of transhipment s in ports	0	0	0	0

designated ports	Number of inspections	0	0	0	0
	% of inspections / transhipment s	0	0	0	0
	Number of infringement s	0	0	0	0

2017:

In	Inspections of third country vessels in Member States ports (2017)						
Type of	Vacata	Figures	Flag of the third country vessel(s)*			country vessel(s)*	
operation	Vessels	(2017)	NO	FO	AG	Total	
		Number of landings	261	15	2	278	
SD	Non-EU	Number of inspections	54	7	0	61	
vessels vessels using MS designated ports	% of inspections / landings	20.6%	46.7%	0	21.9%		
		Number of infringement s	0	0	0	0	
		Number of transhipment s in ports	0	0	0	0	
lents	Non-EU	Number of inspections	0	0	0	0	
Transhipments	vessels using MS designated ports	% of inspections / transhipment s	0	0	0	0	
		Number of infringement s	0	0	0	0	

*Use ISO Alpha-2 country codes

3.3. From the figures above, in the cases where your country detected infringements by third country vessels between 1 January 2016 and 31 December 2017, please specify the flag, the vessel's name, the type of infringement and the measures taken (Article 11 of the IUU Regulation).

Please fill-in the table below (2016):

Flag of the third country vessel*	Name of the third country fishing vessel	Type of infringements	Measures taken
NO	ØSTANGER	Carriage of grader and under declaration of catch	2 x Fixed Penalty Notices (totalling £20,000.00)

*Use ISO Alpha-2 country codes

Please fill-in the table below (2017):

Flag of the third country vessel*	Name of the third country fishing vessel	Type of infringements	Measures taken
FS1			

NA

*Use ISO Alpha-2 country codes

3.4. Has your country had any problems with third country fishing vessels when implementing Articles 6 (prior notice) and 7 (authorisation) of the IUU Regulation?

 \boxtimes Yes \Box No

If yes, please detail the nature of the problems:

2016: Prior Notification period of 4 hours not being fully met by catching vessels landing fresh fish on occasion (Norwegian vessels).

2017: Prior Notification period of 4 hours not being fully met by catching vessels landing fresh fish on occasion (Norwegian vessels.). Several instances when vessels have arrived in port without IUU and PSC1 documents having been fully processed/ authorised. For example, the Norwegian vessel, Starlight Rays AA-0090-A arrived at port of Peterhead without all IUU and PSC1 submissions having been processed as the Norwegian authorities indicated via PSC1 process that their vessel had no quota for the COD retained onboard – subsequently the landing was authorised via agreement with the Norwegian authorities and the master of the vessel that the Cod would be transported/ consigned back to Norway.

Since January 2016, has your country denied access to its ports to a fishing vessel for port services, activities of landing or transhipment of fishery products based on the conditions of the IUU Regulation?

 \Box Yes \boxtimes No

If yes, please detail the nature of the problem, the number of vessels concerned and their flags:

NA

3.5. Do you have third country fishing vessel landings in transit in your country with final destination in another Member State? [Article 19.3 of the IUU Regulation]

 \boxtimes Yes \Box No

If yes, please indicate the number of landings in transit per year:

In 2016: 2

In 2017: 1

Please note: The landings above relate to Faroese vessel Vardborg landing crab at port of Peterhead which was then directly transported to Spain.

3.6. In order to determine the cases for port inspection, does your country use risk assessment criteria [cf. benchmarks for port inspections, Article 4 of Regulation (EC) No1010/2009]?

 \boxtimes Yes \Box No

□ Not applicable (e.g. in the absence of landings/transhipments from third countries)

If yes, please detail:

The UK already carries out risk based inspections of fishing vessels under NEAFC and NAFO Port State Control measures as well as other CFP port state control regimes (pelagic landings). The IUU regulation has extended the definition of fishing vessel and now includes side port vessels built specifically for the Norway to EU liner trade carrying palletised frozen fish products and unloaded through the side of the vessel by forklifts. The inspection of these side port vessels is carried out using risk based analysis which makes use of the benchmarks laid out in EC Regulation 1010/2009 as well as other risk criteria based on a grouping of the benchmarks into six categories (Species, Country, Trade, Business, Documents and Vessels). However for most on these reefer landings the risk is deemed low as they contain fishery products sourced predominantly from Norwegian flagged vessels. This risk will heighten if there are fish sourced from Russian flagged vessels on board.

Section 4. Information on catch certification scheme for <u>importation</u> for the purpose of the IUU Regulation⁷

4.1. How many <u>catch certificates</u> from non-EU countries were presented to the authorities of your country from 1 January 2016 until 31 December 2017?

Elog State	ISO 2 Alpha Code	Catch Cert	tificates
Flag State	ISO 2 Alpha Code	2016	2017
Antigua and Barbuda	AG	11	2
Argentina	AR	85	63
Australia	AU	10	4
Bangladesh	BD	3	0
Belarus	BY	0	1
Belize	BZ	1016	702
Canada	CA	2566	2439
Chile	CL	74	77
China	CN	1125	997
Curacao	AN	41	57
Ecuador	EC	333	429
Egypt	EG	0	0
El Salvador	SU	0	1
Faroe Islands	FO	378	835
Fiji	FJ	0	1
Gambia	GM	2	1
Ghana	GH	510	400
Greenland	GL	233	287
Iceland	IS	2630	5503
India	IN	1636	1404
Indonesia	ID	3094	2772
Ivory Coast	CI	3	83
Jamaica	JM	1	0
Japan	JP	0	0
Korea	KR	203	201
Madagascar	MG	0	4
Malaysia	MY	16	9
Maldives	MU	2783	1341
Mauritania	MR	4	2
Mauritius	MU	171	608
Mexico	MX	230	63
Morocco	MA	590	601
Mozambique	MZ	11	4
Myanmar	MM	60	60
Namibia	NA	9	19

⁷ Section to be filled-in by all Member States. Article 2.11 of the IUU Regulation – "*importation means the introduction of fishery products into the territory of the* Union, *including for transhipment purposes at ports in its territory*"

New Zealand	NZ	188	166
Nicaragua	NI	0	2
Norway	NO	1486	1303
Oman	OM	32	69
Pakistan	PK	17	1
Panama	PA	91	113
Papua New Guinea	PG	155	214
Peru	PE	129	51
Philippines	PH	1687	1869
Russia	RU	2630	2129
Saint Helena	SH	2	0
Senegal	SN	123	138
Seychelles	SC	1760	1413
Singapore	SG	0	0
Solomon Islands	SB	2	2
South Africa	ZA	140	28
Sri Lanka	LK	536	1733
Suriname	SR	0	8
Taiwan	TW	134	113
Thailand	TH	1611	2218
Tunisia	TN	0	2
Turkey	TR	12	7
Ukraine	UA	0	1
Uruguay	UY	1	3
USA	US	2553	4254
Vietnam	VN	576	524
Yemen	YE	3	0
TOTAL	31696	35331	

4.2. From the number above, how many recognised <u>RFMO catch certificates</u> accompanied imports into your country? *Please detail per RFMO certificate and year.*

RFMO document	2016	2017
ICCAT (electronic)- bluefin tuna catch document	142	487
Dissostichus spp. (CCAMLR)	1	1
CCSBT CDS	0	0
Total	143	488

4.3. Has your country received <u>processing statements</u> from 1 January 2016 until 31 December 2017?

 \boxtimes Yes \Box No

If yes, how many <u>processing statements</u> under Article 14.2 accompanied imports into your country? If possible, please provide details per year and per processing country. Please only report processing statements received from non-EU countries:

Elog State	ISO 2 Alpha Codo	Processing	Statements
Flag State	ISO 2 Alpha Code	2016	2017
Bangladesh	BD	0	1
Brazil	BR	1	0
Canada	CA	22	9
China	CN	3567	2481
Ecuador	EC	101	99
Ghana	GH	250	130
Hong Kong	HK	3	0
Iceland	IS	30	325
India	IN	15	24
Indonesia	ID	59	56
Ivory Coast	CI	68	81
Japan	JP	2	0
Korea	KR	36	46
Madagascar	MG	15	16
Malaysia	MY	121	129
Maldives	MV	2	0
Mauritius	MV	304	343
Mexico	MX	2	0
Morocco	MA	7	1
Myanmar	MM	0	2
Namibia	NA	1	0
New Zealand	NZ	1	4
Norway	NO	161	151
Panama	PA	2	1
Papua New Guinea	PG	94	86
Peru	PE	0	1
Philippines	PH	19	61
Russia	RU	32	26
Senegal	SN	1	1
Seychelles	SC	278	189
Singapore	SG	31	6
South Africa	ZA	0	1
Sri Lanka	LK	19	1
Suriname	SR	0	1
Taiwan	TW	132	83
Thailand	TH	830	874
USA	US	261	57

Vietnam	VN	94	162
TOTAL		6561	5448

4.4. Please indicate if the information in <u>processing statements</u> referring to the corresponding catch certificates is retained and recorded:

 \boxtimes Yes \boxtimes No

□ Not applicable (e.g. in the absence of processing statements received from non-EU countries in 2016-2017)

There are not any national requirements to record this information. Individual port health offices do not currently record the weight used from each certificate as set out on the processing statement. The full weight of the consignment exported is recorded.

Port data returns record each Annex IV processing statement, noting the consignment weight, the main 2 species and total number of contributing catch certificates, specifying the flag state and corresponding catch certificate numbers.

Port Health officers check and verify that the products and quantities on accompanying catch certificates are related to the Annex IV Processing statements. These are cross checked with other documents such as the health certificates and invoices.

4.5. Has your country received requests to authorise APEO⁸s in 2016-2017?

 \Box Yes \boxtimes No

If yes, how many requests has your country received and how many APEOs have been authorised?

.....

4.6. Has your country adopted administrative rules referring to the management and control of APEO in 2016-2017?

 \boxtimes Yes \Box No

□ Not applicable (e.g. absence of APEO request)

⁸ Approved Economic Operators – IUU Regulation, Article 16 and Implementing Regulation (EC) 1010/2009, Chapter II

If yes, please detail:

The administrative rules will not have changed since the last report. Please refer to the text below:

The initial application will be sent to our Customs department who will assess the applicant's eligibility for AEO status (basic and full AEO) before referring the application to the UK IUU Team for verification of compliance with Common Fisheries Policy rules. The UK IUU Team will then assess the application against the requirements laid down in Art 16 (3) a-e of EC 1005/2008 and Art 10 to 14 of EC 1010/2010.

In the event there is a successful application the UK will develop a process to monitor and audit the management of records and risk assess security levels of successful APEOs premises. These would from part of a list of components for an APEO performance review.

4.7. Has your country validated <u>re-export certificates</u> for products imported from 1 January 2016 until 31 December 2017?

 \Box Yes \boxtimes No

If yes, how many re-export certificates? Please detail per year and, if possible, per destination country:

NA

- 4.8. Does your country monitor if the catches for which your country has validated a <u>re-export certificate</u> actually leave the EU?
 - \Box Yes \boxtimes No

□ Not applicable (e.g. in the absence of validation of re-export certificates in 2016-2017)

If yes, please detail:

NA

4.9. Has your country established any IT tools to monitor the catch certificates and processing statements accompanying imports?

 \Box Yes \boxtimes No

No bespoke IT systems have been developed for the monitoring of catch certificates at a National level.

Tools to specifically monitor the weights used from catch certificates on processing statements for imports have not been developed – this would be of limited value at an UK level as parts of catches processed may be imported through other MS.

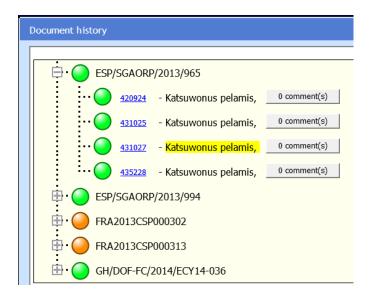
The delivery of controls is carried out by existing authorities, the monitoring of imports and certification is carried out in conjunction with other official controls and details recorded on local border control systems. UK ports use a variety of internal systems for recording fishery imports.

The PHILIS System

The larger seaports of Felixstowe, Southampton and London (Tilbury, Thamesport and Gateway) all use the PHILIS information management system, which is able to log catch certificate numbers and details about the consignment.

The system has a feature that allows a catch document's history to be viewed so that any repeat use can be identified as well as any comments regarding previous imports.

This system is currently being developed to enable a scan copy of all the catch documents to be retained as part of the electronic record. Further developments are being planned which may include recording/ monitoring the weights used from the Annex IV, and will include the more intelligent use of risk information (see diagram below).



All the certificates relating to the consignment can be seen in the history tool. Green indicates that there were no issues with the consignment and amber indicates that there was an issue.

Expanding the tree allows all imports where the certificate was reference to be viewed along with any relevant comments. Comments can be made on a per certificate basis and can be viewed in any new consignment 'job record.'

At seaports imports are monitored through the electronic manifest systems Destin8 and CNS, imports are screened to assess whether the products require a catch certificate. The import/consignment is then risk assessed against UK alerts/MA requests and local port health intelligence in respect of importers, trade pattern, species, etc (risk assessment tool box).

In Northern Ireland 3rd country imports come into Belfast airport as air freight and the Port of Belfast for containerised imports. A summary electronic spreadsheet of IUU imports is maintained, a checklist has been developed for reconciling catch certificates and processing statements.

The Customs Handling of Import and Export Freight (CHIEF) system carries out the final profiling for consignments. Customs tariff controls through document codes are in place to ensure that verifications have been carried out for products in scope for the Regulation. The CHIEF system controls the release onto the EU market. From the 1st May 2014 the outcome of IUU verifications for fishery products subject to veterinary examination will be confirmed within box 42 of the CVED. This will be rolled out UK wide via an electronic checking system - the Automatic Licence Verification System (ALVS) which will automatically match the results of the CVED check and any IUU checks for imports.

The MMO are responsible for verification in respect of Re-exported consignments. Certificates and all supporting documentation are simply scanned and recorded electronically.

Direct third country fishing vessel landings

England

Details of the catch certificates and landing declaration for all imports directly landed by 3rd country vessels are recorded onto an excel spreadsheet as a cumulative ongoing list. In addition an audit checklist is completed for each landing.

The spreadsheet records name of vessel, date of landing, processing statement reference, catch certificate document number, species, importer name, presentation of species, net weight, live weight, and transit goods.

Duplicate catch certificate document numbers are flagged. This regularly occurs for Russian catch certificates that accompany transit goods from Velsen; further checking is carried out to ensure that the weight of goods imported to date does not exceed the weight in the catch certificate.

Scotland

Scotland has developed a purpose built access database for the inputting of all information contained on a catch certificate for a UK landing. The operators of the United Kingdom Fisheries Call Centre (UKFCC) are responsible for entering all information and processing the catch certificate. If it is necessary they will contact the sender of the certificate if incomplete information has been provided to ensure all required data has been collected.

All received documentation is forwarded to the port of landing to assist any inspections that take place and all documents are scanned and stored within a Scottish Government electronic recording and data management system.

An officer (British Sea Fisheries Officer) within the Marine Monitoring Centre is then responsible for checking over the final detail of the catch certificate, prior notification of landing and pre landing declaration before validating the catch certificate and authorising the vessel to land.

Scotland does not have any re-export trade, so there is no module for recording this information.

Wales

No designated ports for 3rd country fishing vessels in Wales

Northern Ireland

No designated ports for 3rd country fishing vessels in Northern Ireland.

If yes, does it include a module for re-exportation of imported catches?

 \Box Yes \boxtimes No

4.10. Does your country implement the provisions regarding transit under Article 19.2 at the point of entry or the place of destination?

\boxtimes At the point of entry	\Box At the place of destination	
Not implemented		

Yes, checks in accordance with Article 19.2 are carried out at the point of entry in the UK.

There are very few consignments that transit the UK as there are no road borders. There are occasional 3rd country to 3rd country transits by road between airports (Gatwick and Heathrow). There is no requirement for the catch certificate to be validated for these consignments as they are not for import. The control/ monitoring of these consignments from a Customs perspective is managed by the New Computerised Transit System (NCTS).

Consignments transhipping within the UK are not required to be accompanied by a catch certificate. Checks on transhipments are carried out by port health officers at seaports by monitoring the electronic manifest control systems. Where transhipment is to another UK port the consignment will not be permitted to move there unless the port is authorised to complete catch certificate checks.

Section 5. Information on catch certification scheme for exportation⁹

5.1. Has your country established a procedure for validation of catch certificates for exportation of catches from own vessels in accordance with Article 15?

 \boxtimes Yes \Box No

□ Not applicable (e.g. in the absence of validation of catch certificates for exportation in 2016-2017)

The UK Fisheries Call Centre validates export catch certificates where the UK fishing vessel is to land in a notified 3rd country or a processing state. The UKFCC operators will check to ensure all applicable information has been received for a UK vessel landing into a third country before validation of the catch certificate is carried out.

The IUU Catch Certificate Centre team validates catch certificates for the exportation of catches from UK fishing vessels landing in the UK or the EU.

Applications are submitted to the Catch Certificate Centre and checks undertaken by the appropriate administration; Marine Management Organisation (MMO) for English and Welsh vessels; Marine Scotland (MS) for Scottish vessels and by Department of Agriculture, Environment and Rural Affairs (DAERA) for Northern Irish vessels. The validated certificate is issued by the MMO (electronically & hard copy).

The UK has a strong monitoring and enforcement system for UK waters & all fishing vessels landing in the UK. A risk based system is employed that directs the day to day enforcement activities of the UK authorities which is recorded on the Monitoring, Control and Surveillance System (MCSS)

All applications for export catch certificates are manually validated against information held by and available to UK Fisheries Departments. The information & tools used in the verification includes the MCSS, electronic and manual logbook records, landing / sales data and all available vessel location monitoring systems combined with intelligence from the SLO or relevant coastal office. In addition all fishing vessels are checked to ensure that they are appropriately registered and licenced in accordance with the regulations and if relevant for the application public databases such as RMFO websites are used.

At this time there is no risk based assessment as we are able to check all submitted applications, however, we are seeking to move towards a system referencing the six IUU benchmark categories; business, country, documents, species, trade & vessel. The resulting risk factor would then determine the frequency and depth of verification to be carried out against any applications for an export catch certificate should we choose not to check each one and would broadly result in the following; **low risk** - one in five catch certificates from the same exporter are verified; **medium risk** - one in 3 are verified; **high risk** - all catch certificates are verified.

⁹ Section to be filled-in by flag Member States.

5.2. Has your country validated catch certificates for exportation in 2016-2017?

 \boxtimes Yes \Box No

If yes, how many catch certificates did your country validate from 1 January 2016 to 31 December 2017? If possible, please provide details per requesting third country/country of destination in the following table:

Destination State	ISO 2 Alpha Code	Year		
State	Code	2016	2017	
Bosnia	BA	1	0	
Cape Verde	CV	0	1	
China	CN	20	45	
Denmark	DK	0	1	
England	UK	0	3	
Ghana	GH	5	0	
Iceland	IS	9	3	
India	IN	27	12	
Indonesia	ID	1	0	
Korea	KR	6	12	
Morocco	МА	79	78	
Nigeria	NG	1	0	
Norway	NO	130	121	
Serbia	RS	0	4	
Slovenia	SI	0	4	
Taiwan	TW	0	6	
Thailand	ТН	18	20	

Tunisia	TN	1	0
Ukraine	UA	14	36
Vietnam	VN	42	35
Total		354	381

5.3. Has your country established any IT tool to monitor the catch certificates validated for exports stemming from own vessels?

 \Box Yes \boxtimes No

No bespoke IT systems have been developed for the monitoring of export catch certificates at a National level.

For the UK IUU Catch certificate centre, all catch certificates are manually validated, catch certificates that are issued are scanned and saved at a central location, their individual details saved on a spreadsheet and documents submitted in respect of an application are archived.

For the UKFCC the access database has also been designed to be able to output validated catch certificates.

The UKFCC operators upon receipt of the information from the master of the UK vessels landing abroad will input the information into the database, select to validate the catch certificate and send it directly to the vessel and representative that sent the initial information notifying of the landing into a third country.

5.4. Does your country monitor that the catches for which your country has validated catch certificates actually leave the EU?

 \Box Yes \boxtimes No

□ Not applicable (e.g. in the absence of validation of catch certificates for exportation in 2016-2017)

5.5. Has your country refused the validation of a catch certificate between 1 January 2016 and 31 December 2017?

 \boxtimes Yes \boxtimes No

□ Not applicable (e.g. in the absence of request for validation of catch certificates for exportation in 2016-2017)

If yes, please detail:

Number (per year): N/A

Reason: Please see comment below

Follow-up: Please see comment below

We have not refused any applications that have been submitted due to the detection of fraudulent or suspicious information.

On occasion applications are submitted that contain incorrect or missing information, in such instances we will work with the exporter / applicant to ensure that all required information is submitted and corrections made prior to processing / validation.

However we have / will continue to refuse to process applications that are submitted in respect of exports for which a catch certificate is not required under the regulations. This may be because the product is being exported for consumption only and is not returning to the EU or because the destination country has not indicated that they require catch certificates to be submitted in respect of imported fishery products from the EU. Section 6. Information on verifications of catch certificates for importation according to Article 17.1 to 5 of IUU Regulation¹⁰

6.1. Has your country established a procedure for verification of catch certificates for importation in accordance with Article 17.2?

 \boxtimes Yes \Box No

If yes, please detail:

In the UK, catch certificates are checked and verified by Port Health officers at the point of import for containerised fishery products at airports and seaports.

The guidance documents that set out the arrangements for the conducting of checks are *Guidance Note for Enforcement Authorities* on the application of the IUU regulations (**provided in a previous report**). These guidance documents are followed when carrying out verifications at the point of import.

6.2. How many catch certificates have been verified by your administration from 1 January 2016 until 31 December 2017? Please specify, separately for each year:

Port Health officers routinely carry out numerous minor verifications during IUU document checks. These will include (but are not exhaustive to) phone calls to UK importers for clarification, web based searches on RFMO's, vessel identification and vessel activity and direct correspondence to RFMO's (where possible). All catch certificates, article 14(1) and 14(2) documents are checked using a generic process that has been modified by each Port Health team to cater for their specific trades. This generic document is then modified by each Port Health Authorities for their specific needs.

The Port Health Authorities that deal with 85% of the import catch certificates conduct full document checks in line with the crib stated above. The only exception to this is catch certificates from countries included in the European Free Trade Association (EFTA) where basic document checks are carried out in terms of ensuring that the species commodity code and weight is correct across all the customs documents. This is normally conducted from between 1 and 5% of the catch certificates that are presented at the border. Electronic checks (with Norway for example) are also completed via their validation website to ensure the catch certificate is compliant. This is between 5 and 100% checks. The actual number of basic and full checks is not documented at each port and therefore an accurate number cannot be given.

¹⁰ Section to be filled-in by all Member States

Marine Scotland complete their own catch certificate checks for direct landings into Scottish ports. Their details are given below:

Flag State of origin (EU or	Number of verifications		Number of verifications		
non-EU) `	2016		2017		
	No of basic document- based verifications ¹¹	No of in- depth verifications ¹²	No of basic document- based verifications	No of in- depth verifications	
NO	169	14	194	53	
FO	26	3	15	7	
AG	10	0	2	0	
Total	205	17	211	60	

6.3. Does your country use a risk assessment approach for verification of catch certificates in accordance with Article 17?

 \boxtimes Yes \Box No

If yes, please detail (e.g. EU criteria for verifications (Article 31 of Commission Regulation 1010/2009); EFCA risk assessment methodology; national criteria)

This has been given in previous reports and the process has not changed.

The UK carries out 100% checks on IUU documents other than those from EFTA countries where they conduct between 1 to 5% basic checks on each consignment. The UK has developed a simple risk management tool that delivery partners at our borders can use to assign a level of risk for a particular consignment/cargo so as to apportion resources according to the level of risk (60% to high, 30% to medium and 10% to low risk).

¹¹ See fields CC1 to CC6 (*Preliminary overview checks "helicopter view"*) of the EFCA Common methodology for IUU catch certificates verification and cross-checks.

¹² See fields CC7 to CC32 (Verify and cross-check information related to the form, flag state, validating authority, fishing vessel, product(s), transhipment operations) of the EFCA Common methodology for IUU catch certificates verification and cross-checks.

The model assumes a normal distribution representing 100% of resources which is divided into 3: low, medium & high risk rating. The benchmarks for inspection, Art 4 of EC 1010/2009, have been allocated to 6 broad risk categories: Business, Country, Documents, Species, Trade and Vessel. We have populated each risk category with objective sources of information (website databases, links to trade data analysis, etc) that will help port health authorities to develop the risk model further and determine the risk rating of a consignment.

UK Port Health Authorities that deal with 85% of the IUU documents (catch certificates and article 14(1) and 14(2) documents) conduct a full compliance check using the generic 10 steps check list template. Therefore no risk assessment is apportioned to each type of trade.

6.4. Does your country also physically verify the consignments?

 \boxtimes Yes \Box No

If yes, please detail:

UK Port Health Authorities will not routinely conduct a physical check under the IUU Regulation. However there are a proportion of physical checks conducted at each Border Inspection Post in accordance with the Trade in Animal Products Regulations (TARP) 2011. These physical checks could be attributed to physical inspections under the IUU Regulation however this number has not been documented so far.

Marine Scotland conduct some physical inspections for direct landings into Scottish ports. These are given below:

Number (per year): 17 and 60 in years 2016 and 2017 respectively

Method of selection: Risk based approach in line with consideration of criteria set out in Article 31 of Commission Regulation 1010/2009)

Follow-up: None

Section 7. Verification requests to flag States¹³

7.1. Has your country sent requests for verifications under Article 17.6 of the IUU Regulation to other countries authorities in 2016-2017?

 \boxtimes Yes \Box No

If yes, how many requests for verifications? *Note: please provide separate data for 2016 and 2017*:

Flag States	No of requests for verifications 2016	Justifications (Articles 17.4 and 17.6 of the IUU Regulation)-	No of requests for verifications 2017	Justifications (Articles 17.4 and 17.6 of the IUU Regulation
	2	Weight issue on		
Mauritius	2	processing statement		
Russia	2	Vessel licensing issues	1	S9 no stamp issue
Spain	1	Vessel details mismatch		
South Africa	1	SEAFO authorisation		
Philippines	2	WCPFC authorisation		
		Transhipment authorisation in WCPFC		
Vietnam	1	SMS: Stamp issue	1	SMS: Stamp issue
France	1	CCAMLR authorisation		
Argentina	1	Establishment error		
Maldives	1	Vessel name change not notified		
Taiwan	1	IOTC authorisation		
Norway	1	Cancelled catch certs		
Korea	2	WCPFC authorisation	2	NPFC authorisation
		NPFC authorisation		Traceability issues
USA	1	Date mismatch	3	Superseded catch certificates

¹³ Section to be filled-in by all Member States

Flag States	No of requests for verifications 2016	Justifications (Articles 17.4 and 17.6 of the IUU Regulation)-	No of requests for verifications 2017	Justifications (Articles 17.4 and 17.6 of the IUU Regulation
Gambia	1	SMS: stamp issue		
Seychelles	1	IOTC authorisation		
China	3	NPFC authorisation		
Ghana	1	Iroko investigation		
Ecuador			1	IATTC authorisation
India			2	SMS: stamp IUU vessel name query
Indonesia			2	EEZ licence issues
Panama			1	SMS: catch certificate template
Surinam			1	SMS: processing statement template issue
New Zealand			3	WCPFC authorisation – EEZ issue
Chile			1	CCAMLR authorisation
Belize			2	Vessel name change – catch certificate and RFMO mismatch
Total	23		20	

7.2. How many requests for verification were not replied to by the other countries' authorities within the deadline provided in Article 17.6 of the IUU Regulation? Does your country in these situations send a reminder to the authorities of the country in question? [Please provide separate data for 2016 and 2017]

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If there has not been a response by the specified deadline the normal procedure is to send a reminder to the flag state authority and the UK importer for further information. This reminder is documented via an email and gives the flag state authority a further 7 days to response either with the information we need or a holding response. The UK importer is involved in this process as this information may be obtained via them of a further prompt given to the flag state.

7.3. Was the quality of the answers provided overall sufficient to satisfy the request?

 \boxtimes Yes \Box No

In most cases the quality of the response was sufficient enough for the team to make a decision on the fate of a consignment. In the rare case that the response was not enough to proceed with then the flag state competent authority would be contacted either via email or a second formal verification request. Section 8. Information on refusal of importations (Article 18 of the IUU Regulation)¹⁴

8.1. Has your country refused any imports from 1 January 2016 until 31 December 2017? Note: please only consider refusals based on the IUU Regulation, not for other reasons e.g. Food Safety, Customs legislation, etc.

 \boxtimes Yes \boxtimes No

If yes, please provide details in the table below:

Reason for refusal of	2016		2017	
importation	Flag State	No.	Flag State	No.
Non-submission of a catch certificate for products to be imported.	USA Taiwan	1		
	Malaysia	1		
The products intended for importation are not the same as those mentioned in the catch certificate.	USA	1		
The catch certificate is not validated by the notified public authority of the flag State	Mexico	2		
The catch certificate does not indicate all the required information.				
The importer is not in a position to prove that the fishery products comply with the conditions of Article 14.1 or 2.			Thailand	1
A fishing vessel figuring on the catch certificate as vessel of origin of the catches is included in the Union IUU vessel list or in the IUU vessel lists referred to in Article 30.				

¹⁴ Section to be filled-in by all Member States

Reason for refusal of	2016		2017	
importation	Flag State	No.	Flag State	No.
The catch certificate has been validated by the authorities of a flag State identified as a non- cooperating State in accordance with Article 31				
Further to the request for verification (Article 18.2)	Faroes	1	Panama	1

8.2. If the answer to 8.1 is yes, what measures were taken by your authorities towards the refused fishery products?

Fishery products that are refused importation were either re exported back to source country or donated to charity. In accordance with section 268 of the Marine and Coastal Access Act 2009. There can only be forfeiture of fishery products from a UK importer in the event of a court conviction.

8.3. In case of refusal of importation, did the operators contest the decision of the authorities of your country?

 \Box Yes \boxtimes No

If yes, please detail:

Section 9. Information on trade flows¹⁵

9.1. Did your country note a change¹⁶ of imports of fishery products since the last reporting exercise covering the period 2014-2015?

 \boxtimes Yes \Box No

If yes, please detail:

Over the course of 2016 trade continued to shift from Tilbury to London Gateway. In addition London Gateway started receiving regular ad-hoc vessels diverted from Felixstowe (September 2015 to date). These vessels carried trade not currently received at the Ports of London and comprised of mainly Far Eastern imports. This steadily increased alongside consignments accompanied by Chinese processing statements and catch certificates from Russia, Greenland, Norway, Seychelles, Mauritius, Mauritania, St Helena, Thailand and Indonesia.

Through 2017 trade patterns continued to change within the Ports of London with all remaining international Shipping Lines (with the exception of the West African trade) being moved from Tilbury to London Gateway. This port also continued to receive ad-hoc vessels diverted from Felixstowe. London Gateway has now secured additional Shipping Lines bringing trade from Turkey, the Far East and North America. Imports have continued to increase as a result.

Which of the trades posed the most risk?

China & Russia due to the complexity of the trade routes and the amount of processing that is carried out at different countries along the trade route. In addition the quality of the copies of the Russian Catch certificates, provided by the Chinese Authorities, remains extremely poor with the Flag State Authority Official Stamps being illegible. There have been multiple informal requests for better copies covering most imports where these documents are present. Imports from both of these countries are increasing due to the diverted vessels received at London Gateway.

9.2. Please provide information, deriving from your country's statistical data, concerning change of trade patterns in imports of fishery products into your country:

The Port of the City of London is not able to provide statistical data on these changes.

¹⁵ Section to be filled-in by all Member States

¹⁶ For example: new kinds of fishery products, new trade patterns or significant and sudden increase in trade volume for a certain species and/or certain third countries.

Section 10. Information on mutual assistance¹⁷

10.1. Since the last reporting exercise covering the period 2014-2015, how many mutual assistance messages of the Commission has your country replied to?

Please provide separate data for 2016 and 2017 (if any)

2017.....5

10.2. Since the last reporting exercise covering the period 2014-2015, has your country sent any mutual assistance message to the Commission/other Member States?

Please provide separate data for 2016 and 2017 (if any)

2016.....2

2017.....2

¹⁷ Section to be filled-in by all Member States

Section 11. Information on cooperation with third countries¹⁸

- 11.1. Apart from verifications and refusals under Articles 17 and 18, has your country had information exchange with third countries on issues related to the implementation of the IUU Regulation, such as follow-up of cases concerning nationals, consignments, trade flows, operators, private fishing licencing, as well as the investigation of criminal activities and serious infringements (Article 42)?
 - \boxtimes Yes \Box No

If yes, please detail (please provide separate data for 2016 and 2017, if any

Ghana: Since 2012 the UK has been conducting an investigation pertaining to the alleged non compliance of Ghanaian flagged vessel that attributed to large quantities of tuna products that were being imported into the UK. This has culminated in multinational co operation with Ghana, Belize and the representatives from the DG Mare IUU Team. This investigation is still ongoing and no further information can be given at this time.

Astrid (IMO 8404501): In June 2016 the UK received Mutual Assistance Request MA GBR 002 (and later MA GBR 003) pertaining to the Comoran flagged vessel ASTRID (IMO 8404501). The vessel was owned by UK national and it was alleged the vessel was operating in contravention to Comoran fisheries law in the high seas and within the EEZ of Mauritania. The UK took up the investigation and responded to DG Mare by October 2016 with their results which showed;

- The vessel had been operating in New Zealand under their flag:
- The owners changed the flag to Comoros to facilitate passage from New Zealand to Las Palmas in Spain for a re fit.
- The vessel was operating within the Comoran legal framework for external waters vessels
- The vessel did not have a licence to fish within the Mauritanian Exclusive Economic Zone and was not operational at the time.

Please note there was no co operation from the Comoran authority when they were approached on this matter.

¹⁸ Section to be filled-in by all Member States

Section 12. Information on nationals¹⁹

- 12.1. Since the last reporting exercise covering the period 2014-2015, has your country implemented or modified existing measures to ensure that your country can take appropriate action with regards to nationals involved in IUU fishing in accordance with Article 39 of the IUU Regulation?
 - \Box Yes \boxtimes No

If yes, please detail:

12.2. What measures has your country taken to encourage nationals to notify any information on interests in third country vessels (Article 40.1)?

No direct measures have been put into place however UK fleet operators will typically notify coastal fisheries officers if any 3rd country flagged vessels have been seen.

12.3. Has your country endeavoured to obtain information on arrangements between nationals and third countries allowing reflagging of their vessels in accordance with Article 40.4?

 \Box Yes \boxtimes No

If yes, please detail:NA

12.4. If yes to any of the above, how many cases have your country dealt with and which administrative or penal follow-up was given?

Please provide details:NA

12.5. Has your country put in place procedures to ensure that nationals do not sell or export any fishing vessels to operators involved in the operation, management or ownership of fishing vessels included in the Union IUU vessel list (Article 40.2)?

 \Box Yes \boxtimes No

If yes, please provide details: NA

12.6. Has your country made use of Article 40.3 and removed public aid under national aid regimes or under Union funds to operators involved in the

¹⁹ Section to be filled-in by all Member States

operation, management or ownership of fishing vessels included in the Union IUU vessel list?

 \Box Yes \boxtimes No

If yes, please detail:NA

Section 13. Infringements (Chapter IX of the IUU Regulation) and Sightings (Chapter X of the IUU Regulation)²⁰

- 13.1. Has your country detected serious infringements as defined in Article 42 of the IUU Regulation from 1 January 2016 until 31 December 2017?
 - \Box Yes \boxtimes No
- 13.2. Has your country applied or adapted its levels of administrative sanctions in accordance with Article 44?
 - \Box Yes \boxtimes No

As stated in the last report Our Crown courts have always had unlimited fines available.

- 13.3. Has your country issued sighting reports from 1 January 2016 until 31 December 2017?
 - \Box Yes \boxtimes No
- 13.4. Since the last reporting exercise covering the period 2014-2015, has your country received any sighting reports for its own vessels from other competent authorities?
 - \Box Yes \boxtimes No

If yes, please detail follow-up (in accordance with Article 50 of the IUU Regulation).

NA

²⁰ Section to be filled-in by all Member States

14.1. In the reporting period 2016/2017, what have been the main difficulties that your country has encountered in implementing the IUU Regulation, including the catch certification scheme?

RFMO websites not being up to date thus leading to the detention of legal consignments whilst proof of vessel authorisations are sought for example via the UK importer and/or the flag state of the catch certificate.

Not having direct access to RFMO administrations for queries on vessel authorisations or provisions within their conservation and management measures.

SMS data not always being disseminated to the UK data handlers for use by the IUU team

Monitoring of the over usage of catch certificates when accompanied by processing statements on a national and EU level.

Being able to accurately monitor vessel activity for fishing operations and transhipment activity for those vessels stated on catch certificates.

The ownership and use of 3rd country vessel licence or permit templates for the use of enforcement officers so these can be checked against any requests for these documents made under article 17(6) of the IUU Regulation.

14.2. Which improvements would your country suggest to the Regulation that would make implementation smoother?

The EU electronic catch certificate system will deal with some of the issues above in terms of monitoring of documents being used within the EU.

Direct access to RFMO organisations.

3rd country vessel lists to determine those that are licensed to a 3rd country and operate within their own EEZ (simplified catch certificates for example).

None to add.

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