

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

Member State: Denmark

Organisation: Ministry of Food, Agriculture and Fisheries

Date: 30th April 2014

Name, position and contact details of responsible official:

Landings and export

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May the Commission provide a copy of this questionnaire to other Member States?

Yes: x

Denmark recommends that all questionnaires from all Member States are made available for other Member States.

Yes except for questions (list):

No:

Section 1: Legal framework

1.1 Has your country transposed into national law or issued any administrative guides for the application of Council Regulation (EC) No 1005/2008 on illegal, unreported and unregulated fishing (IUU Regulation)?

YES: x NO _____

If yes, please detail and provide copies.

Danish consolidated Act No 978 of 26.9.2008 on Fishery and Fish-farming (the Fishery Act) contains measures to ensure the effective application of IUU Regulation.

DVFA has issued two administrative guidelines: One for the border inspectors who carry out the IUU import and re-export control, and one for the importers. Link to importers guide:

[http://www.foedevarestyrelsen.dk/SiteCollectionDocuments/25_PDF_word_filer%20til%20download/03kontor/IUU/Kontrolvejledning%20til%20erhvervet,%20oktober%202013%20\(1\).doc](http://www.foedevarestyrelsen.dk/SiteCollectionDocuments/25_PDF_word_filer%20til%20download/03kontor/IUU/Kontrolvejledning%20til%20erhvervet,%20oktober%202013%20(1).doc)

Copy of updated version of the administrative guideline for the border inspectors could be provided at the next ad hoc meeting on the implementation of IUU Regulation in Fisheries Control Experts Group.

Section 2: Administrative Organisation

2.1 How has your country organised its services to deal with the implementation of the IUU Regulation (verification of catch certificates, validation of catch certificates for own vessels, etc.)?

As described in the Danish notification the control is organized as follows:

AGRIFISH

- Verification of catch certificates on landings
- Validation of catch certificates for exports

DVFA

- IUU import control
- Verification of catch certificates on imports
- Validation of re-export certificates

a) internal co-operation (between local/regional Fisheries authorities and head-quarter);

AGRIFISH

The internal co-operation is coordinated by the Danish Fisheries Monitoring Centre.

DVFA

- Single Liaison Officers situated in the International Trade Division deal with
 - Requests for verification to Flag State authorities
 - Mutual assistance requests from the Commission and other Member States
 - Issuance of administrative guidelines to the IUU control staff at the veterinary border inspection posts and to importers
 - Training of staff
- Danish border inspection posts
 - Imports IUU control (documentary, identity and physical checks)
- Border inspection post Aalborg
 - Re-export control (documentary checks)

AGRIFISH and DVFA have established a structured co-operation for the implementation.

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

There is both central and regional co-operation with the Customs Services.

c) how many persons are involved in the implementation of the catch certificate?

If different, please distinguish between direct landings of 3rd country fishing vessels and other imports (processed products)

AGRIFISH

Direct landings and export: 13 persons (approx. 2.0 man years (FTE)).

DVFA

Import and re-export: 19 persons (approx. 6.5 man years (FTE)).

2.2 Do the authorities of your country have the possibility to audit/verify a company for the purposes laid down in the IUU Regulation? If yes, have they undertaken such audits/verifications yet? Please detail.

The possibility to audit/verify a company is laid down in the Danish consolidated Act No 978 of 26.9.2008 on Fishery and Fish-farming (the Fishery Act), § 117 - § 119. DVFA has used this possibility once to investigate if a specific company prenotified imports as laid down in the legislation. This investigation is still ongoing.

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

Denmark has on Freeport. Relevant activities: Border inspection post. No other relevant activities.

Section 3: Direct landings of third country fishing vessels (only applicable if designated ports)

Please list your designated ports:

Esbjerg, Fredericia, Hanstholm, Hirtshals, Hvide Sande, København, Skagen, Strandby, Thyborøn, Ålborg, Århus

3.1 How many landings and transshipments of third country vessels have been recorded by your country since 1 January 2012 until 31 December 2013?

Port name*	No. of landings	Comments	No. of transshipments	Comments
Esbjerg (NAFO, NEAFC)	0		0	
Fredericia (NAFO, NEAFC)	0		0	
Hanstholm (NAFO, NEAFC)	859		0	
Hirtshals (NAFO, NEAFC)	440		0	
Hvide Sande	0		0	
København (NAFO, NEAFC)	0		0	
Skagen (NAFO, NEAFC)	171		0	
Strandby	0		0	
Thyborøn	30		0	
Ålborg (NAFO, NEAFC)	0		0	
Århus (NAFO, NEAFC)	0		0	
Total	1.500	--	0	--

* If the port is designated also for an RFMO, please indicate which RFMO in brackets.

3.2 Approximately, what percentage of the third country fishing vessel landings arrives in transit in your country?
0 %

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

YES _____ NO: x

If yes, please detail:

- a) in which ports;
- b) the nature of problem;
- c) vessel details (name, flag, master, etc.);

3.4 Since January 2012, have you refused access to your port services to a fishing vessel for activities of landing or transhipment of fishery products? Was this refusal based on the conditions of the regulation?

YES _____ NO: x

If yes, please detail:

- a) in which ports;
- b) the nature of problem;
- c) vessel details (name, flag, master, etc.);

An agent for Russian vessels has asked about the requirements of the IUU Regulation if a third country vessel wishes to tranship in a Danish port. The rules were explained. So far it has not resulted in any requests to tranship in Danish ports.

3.5 Do third country fishing vessels accessing your ports use the templates for prior notifications and pre-landing/pre-transhipment provided by the Implementing Regulation 1010/2009 or those used in RFMOs? Please detail, when RFMO forms are used.

Third country fishing vessels use the templates for prior notification and pre-landing/pre-transhipment required by the IUU Regulation. Simultaneously, the RFMO port state forms are used by the third country fishing vessels when required by the RFMO's.

Section 4: Port inspections in accordance with Section 2 of the IUU Regulation

4.1 Between 1 January 2012 and 31 December 2013, how many fishing vessels of third countries had access to the designated ports for landing or transhipment of fishery products?

1.500.

4.2 How many fishing vessels were inspected between 1 January 2012 and 31 December 2013?

Reason for inspection :	Flag State	
	2012	2013
Sighted at sea in activities that may be considered illegal, unreported and unregulated	0	0
Based on the EU IUU vessel list	0	0

Other (please detail)	FRO 1	0
	CAN 1	0
	GRL 1	0
	NOR 49	NOR 48

4.3 How many fishing vessels were inspected between 1 January 2012 and 31 December 2013?

100.

4.4 Does your country use risk assessment criteria for the port inspections?

YES: x NO_____

If yes, please detail.

In Denmark, the inspections at sea and at the landing are guided by a risk management system. Landings from third country fishing vessels are included in this. This system is still under development.

4.5 Has your country detected any infringements?

YES: x NO_____

- If yes, how many and of what nature? Please specify.

1.

A former Norwegian fishing vessel (FA-14-FS), not registered, was used to fish out of a Danish port during the period from 2nd September 2011 to 19th May 2013 making in total 16 landings with a total catch of 657,5 kg mixed fish having a value of 8.394,5 DKK.

On 6th February 2014 the master, a Norwegian living in Denmark, was found guilty and fined 42.000 DKK by the Danish court. The infringement was sanctioned in accordance with Article 44 (2) of the IUU Regulation.

- If yes, did your country apply the procedure in case of infringements as foreseen in article 11?

Yes.

Section 5: Catch certification scheme for importation

Please state your notified authorities under articles 17.8 and 21.3:

Import and re-export

Sanne Thorn Jensen

Single Liaison Officer

Anne Ramløse

Single Liaison Officer

The Danish Veterinary and Food Administration (DVFA)

Email: iuu@fvst.dk

5.1 How many catch certificates were presented to the authorities of your country from 1 January 2012 until 31 December 2013?

If possible, please provide details per flag State.

Flag State \ Year	2012	2013
Argentina	26	32
Australia	27	0
Belize	11	10
Canada	773	801
Chile	17	15
China	85	101
Colombia	92	90
Denmark	18	24
Ecuador	15	36
El Salvador	1	1
Estonia	62	56
Faroe Islands	1696	1222
France	61	149
Germany	16	3
Ghana	38	40
Greenland	5197	3994
Iceland	1596	1493
India	24	37
Indonesia	49	66
Ireland	13	5
Japan	1	1
Malaysia	0	1
Maldives	15	11
Mexico	2	0
Morocco	4	1
Netherlands	0	1
New Zealand	61	69
Norway	10722	11071
Panama	5	7
Peru	4	0
Philippines	60	76
Poland	0	1
Portugal	5	0
Russia	149	65
Senegal	0	1
Seychelles	26	81
Solomon Islands	0	4
South Africa	0	1
South Korea	32	77
Spain	88	268
Sri Lanka	12	3
Taiwan	24	60
Thailand	189	187

Tunisia	0	1
United Kingdom	94	124
USA	378	536
Vietnam	80	80
Total	21.768	20.727

5.2 From the number above, how many recognised RFMO catch certificates accompanied imports into your country? Please detail per type of RFMO certificate and year.

RFMO \ Year	2012	2013
ICCAT BFT	0	0
Dissostichus spp. (CCAMLR)	0	6
CCSBT CDS	0	0
Total	0	6

5.3 How many processing statements under Article 14.2 accompanied imports into your country?

If possible, please provide details per year and per processing country.

Processing State \ Year	2012	2013
Belize	2	0
Canada	47	47
China	1363	572
Colombia	0	4
Ecuador	5	14
Faroe Islands	239	324
Ghana	11	12
Greenland	20	25
Iceland	176	162
Madagascar	3	0
Mauritius	12	109
Norway	131	118
Papua New Guinea	22	54
Philippines	1	0
Seychelles	134	360
Singapore	7	10
Taiwan	1	1
Thailand	95	177
Tunisia	0	1
USA	1	9
Vietnam	4	1
Total	2.274	2.000

5.4 Please explain if the information in processing statements referring to the corresponding catch certificates is retained and recorded.

All information in the processing statements is recorded in an Excel sheet. In a shared database a scanned copy of each processing statement is filed together with the relevant CC /CCs, to permit cross check between the amount stated in the CC and processed and imported products. All processing statements received are also physically kept together with the CC at

the border inspections posts. The information is used to count down on the catch amounts on each CC used for further processing as far as imports into Denmark are concerned.

5.5 How many requests to authorise APEOs have you received and how many APEOs have you authorised?

Denmark does not have any APEOs and has not had any applications.

5.6 Please explain briefly the administrative rules referring to the management and control of APEO.

DFVA is responsible for authorising APEOs. DFVA has not implemented procedures yet since no applications have been received.

5.7 How many re-export certificates were validated by your country for imported products from 1 January 2012 until 31 December 2013? Please detail per year and, if possible, per destination country.

2012: 1.421

2013: 2.113

DVFA does not register country of destination.

5.8 Do you monitor if the catches for which you validated a re-export certificate actually leave the EU?

No, but DVFA is empowered to according to national legislation.

5.9 Has your country established any IT tools to monitor the catch certificates and processing statements accompanying imports? Does it include a module for re-exportation of imported catches?

YES_____ NO: x

If yes, please detail.

DVFA register all imports and re-exports in Excel sheets. All CC and Annex IV statements are filed in a shared database.

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

At the point of entry.

Section 6: Catch certification scheme for exportation

Please state your notified authorities under article 15.2:

The Danish AgriFish Agency (AGRIFISH)

Email: iuu@naturerhverv.dk

6.1 Has your country established a procedure for validation of catch certificates for exportation of catches from own vessels?

YES: x NO_____

If yes, please explain briefly the established procedure.

An export company presents a CC for the export to the AGRIFISH FMC by email. The FMC validates the CC by checking the logbook of the vessel, its VMS data, sales notes for the catches and the quota uptake of the vessel.

6.2 If yes: How many catch certificates did your country validate from 1 January 2012 to 31 December 2013? If possible, please provide details per requesting country/country of destination in the following table.

Destination State	IUU Regulation	Year	
	(art. 14.2 / art. 15)	2012	2013
China	1	0	1
Greenland	4	2	2
Iceland	22	12	10
Morocco	3.553	1.696	1.857
Norway	94	30	64
Ukraine	41	0	41
Total	3.715	1.740	1.975

6.3 Has your country establish any IT tool to monitor the catch certificates validated for exports stemming from own vessels?

YES: x NO_____

If yes, please detail.

AGRIFISH has a satellite tracking system, vTrack, an ERS system for logbooks, landing declarations and transshipment declarations and an electronic sales note system.

6.4. Do you monitor that the catches for which you validated Catch Certificates actually leave the EU?

YES_____ NO: x

If yes, please detail.

6.5. Have you ever refused the validation of a catch certificate?

YES: x NO_____

If yes, please detail.

If the CC is not completed in all its parts, it will be refused and when the exporter presents a complete version of the CC, then it will be validated unless attempted fraud is suspected.

Section 7: Verifications of catch certificates for importation

7.1 Has your country established a procedure for verification of catch certificates for importation?

YES: x NO _____

If yes, please detail

The procedure is specified in the guidelines to the border inspectors. All CC or Annex IV with errors or doubt about authenticity will be sent for verification. CC's indicating transshipment at sea, CC's from potential non-cooperating countries, CC's where there is doubt about the fishing areas etc. will be sent for verification with the Flag State authorities through the SLO.

7.2 How many catch certificates have been verified from 1 January 2012 until 31 December 2013?

All CCs from all notified Flag states except Norway are controlled and different parameters based on risk assessments are verified if necessary. In our guideline it is specified that 5 to 10% of the catch certificates should be checked more thoroughly. Denmark considers Norway as a low risk country and only 25 % of the CC's are controlled and verified if necessary. All Norwegian CC's are still recorded in the excel sheet and CC and Annex IV are filed in our database.

Numbers of CC's or Annex IV where verification requests are sent to the Flag State authority are answered in 8.1.

7.3 Does your country use a risk assessment approach for verification of catch certificates?

YES: x NO _____

If yes, please detail.

Please see points 7.1 and 7.2.

7.4 Does your country also physically verify the consignments?

YES: x NO _____

If yes, please detail (reason, method of selection, number, etc.).

DK combines veterinary border control with the IUU control; this means that the physical checks are carried out to ensure both veterinary and IUU requirements. Consignments which are not subject to veterinary import checks will be checked physically on a random basis. Consignments from Norway, Iceland and the Faroe Islands will be checked randomly in campaigns.

Section 8: Verification requests to flag States

8.1 How many requests for verifications have been sent to third country authorities?

Third country\Year	2012	2013	Main reason for request
Australia	4	0	CC not filled in correctly
Bangladesh	1	0	CC for aquaculture or wild caught?
Belize	2	2	Confirmation of validity
Canada	16	2	CC not the CA database. CC database says contact the CCO
Colombia	0	3	Closure period for tuna fishing
Estonia	0	1	Reference to expired license
Faroe Islands	9	4	Wrong CN codes. CC number used twice. Weight not correct. Annex IV not stamped. Annex IV incorrectly filled in.
Ghana	5	5	CC with corrections. Not notified national processing statement used. Vessel name missing. No license to fishery in other country EEZ. Fishing license number wrong. Transshipment at sea.
Greenland	1	3	Expired license. Signature missing.
Iceland	5	5	Annex IV refers to invalid CA CC. Vessel not on IS list. Weight not correct. Annex IV not signed/signature not readable.
India	1	0	Confirmation of validity
Indonesia	1	2	Transshipment. Confirmation of validity. Catch area.
Japan	1	0	Confirmation of validity
Korea	0	1	Confirmation of validity. Transshipment at sea.
Malaysia	0	1	Confirmation of validity. CC not correctly filled in.
Maldives	0	2	Confirmation of validity
Mauritius	0	1	Confirmation of validity of Annex IV
Marshall Islands	0	1	Transshipment of TW caught fish
Mexico	1	0	Confirmation of validity
New Zealand	1	0	Confirmation of validity
Norway	4	2	CC not in the NO database. Vessel name incorrect. Wrong CN codes. Annex IV without CC connection. Banned FO herring on Annex IV.
Papua New Guinea	0	1	Validity of Annex IV. Questions about transshipment in PNG.
Philippines	1	3	Confirmation of validity. Fishing area not specified. License not valid. Weight not correct. CC number used twice. Transshipment at sea.
Russia	3	1	Confirmation of validity. Vessel

			name missing. Signature not in SMS database.
Senegal	0	1	Confirmation of validity. Weight not correct.
Seychelles	0	4	Confirmation of validity. CC with wrong number on page 2. Annex IV without stamp.
Solomon Islands	0	1	Confirmation of validity
Spain	0	4	CC signature not in SMS. CC number different from earlier. License expired.
South Africa	0	1	Confirmation of validity
Taiwan	0	3	Confirmation of validity. Transshipment at sea. Weight in CC.
Thailand	0	2	Confirmation of validity. Catch area. Annex IV validity.
United Kingdom	0	2	Signature on CC not in SMS database
USA	51	52	CC invalid in the US database
Vietnam	1	2	Confirmation of validity. CC with errors/not signed. Annex IV validation.
Total	108	112	--

What were the main reasons for these requests? Please specify by using the reasons provided in articles 17.4 and 17.6 of the IUU Regulation.

Main reason for requests: article 17.4 a) and b) (b) was used in Ghana cases). The procedures in article 17.6 are followed.

8.2 How many requests for verification were not replied to by the third country authorities within the deadline provided in article 17.6 of the IUU Regulation? Does your country in these situations send a reminder to the third country authorities?

8 requests for verification were not replied within the deadline. Reminders are always sent.

8.3. Was the quality of the answers provided overall sufficient and satisfactory enough to satisfy the request?

The answers were satisfactory.

Section 9: Refusal of Importations

9.1 Has your country refused any imports from 1 January 2012 until 31 December 2013? If yes, please provide details in the table below:

Reason for refusal of importation	2012		2013	
	Flag State	No.	Flag State	No.
Non-submission of a catch certificate				

for products to be imported.				
The products intended for importation are not the same as those mentioned in the catch certificate.				
The catch certificate is not validated by the notified public authority of the flag State				
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).				
A fishing vessel figuring on the catch certificate as vessel of origin of the catches is included in the Community IUU vessel list or in the IUU vessel lists referred to in Article 30.				
Further to the request for verification (Article 18(2))	Indonesia	1	Faroe Islands	1
			Ghana	4
			USA	3

9.2 If the answer to 9.1 is yes, what did your country do with the fishery products?

Denmark refused importation. The consignments were either sent back to the country of origin or sent for destruction.

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

YES _____ NO: x

If yes, please detail.

Section 10: Trade flows

10.1 Did you note a change of imports of fishery products since the introduction of the IUU regulation? Please provide information, deriving from your statistical data, concerning change of trade patterns in imports into your country of fishery products.

There have been some changes in the trade patterns:

- Change in processing countries:
 - More imports of fishery product processed in the Seychelles, Mauritius and PNG and
 - fewer imports of processed fishery products from China
- There has been a rise in imports of fish caught by Korean vessels
- There has been no import of Ghanaian caught fish since autumn 2013
- The first imports of *Dissostichus* spp were in 2013

Section 11: Mutual Assistance

11.1 How many mutual assistance messages of the Commission has your country replied to?

12.

11.2 Has your country sent any mutual assistance message to the Commission/other Member States?

YES: x NO_____

If yes, please detail.

Denmark has sent Mutual Assistance messages to the Commission and to all SLOs about refusals of import. See 9.1.

Section 12: Nationals

Please state your notified authorities under Article 39.4:

AGRIFISH

- Verification of catch certificates on landings
- Validation of catch certificates for exports

DVFA

- IUU import control
- Verification of catch certificates on import
- Validation of re-export certificates

12.1 What measures has your country implemented since 1 January 2012 or already had in place on 1 January 2012 to ensure that your country can take appropriate action with regards to nationals involved in IUU fishing?

Danish consolidated Act No 978 of 26.9.2008 on Fishery and Fish-farming (the Fishery Act) has on 2nd May 2012 been adapted to deal with Danish nationals involved in IUU fishing except Danish nationals permanently residing in the Faroe Islands and Greenland since they are not covered by the law. See Article 1, no. 21 and no. 23, in the following link for legal reference: <https://www.retsinformation.dk/forms/R0710.aspx?id=141513>.

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

None.

12.3 Has your country endeavoured to obtain information on arrangements between nationals and third countries allowing reflagging of their vessels? If yes, please list of vessels.

No.

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

13.1 How many infringements did your country record from 1 January 2012 until 31 December 2013?

1.

Please detail.

See point 4.5.

13.2 Has your country applied or adapted its levels of administrative sanctions in accordance with Article 44?

See point 4.5.

13.3 How many sighting reports were issued by your country from 1 January 2012 until 31 December 2013?

0.

Please detail.

13.4 Has your country received any sighting reports for its own vessels from other competent authorities?

YES_____ NO: x

If yes, please detail.

14. General

14.1 What have been the main difficulties that you have encountered in implementing the catch certification scheme?

- Lack of a common IUU IT system means that the IUU control in the Community is less efficient
- It is still difficult to handle small Norwegian fishing vessels fishing and landing in Denmark. These small vessels use Danish ports and make day trips out of these ports. Prior notifications and the catch certification scheme are difficult in these cases with short distances to port.
- Verification of the consignments is often hampered by lack of transport details in the CC. The requirement for transport details is not properly specified in the regulation. The flag state authorities do not always feel responsible for this information as the transport section is placed beneath the validation section. It is not possible to see if the catch is landed in another country than the flag state.
- According to Commission interpretation, the regulation does not provide the possibility to issue replacement CCs. This means that any error regarding weight in the CC could lead to rejection. Both USA and Canada issues superseding or replacement CC and Annex IV.

- The different possibilities to declare weight in the CC give rise to confusion since this often means a discrepancy to information in other accompanying documents especially the processing statements.
- The lack of specification that MS authorities may require that other accompanying documents, such as Bill of Lading, are systematically forwarded with the CC.
- The information provided in the SMS database is very difficult and time consuming to access and use.
- It is a problem that the MS authorities do not have full access to the information in the third countries databases used for issuing electronic certificates. It is not possible to verify the authenticity of the CCs and check if further information has been added after validation.
- It is problematic that CCs in the administrative agreements with third countries do not all include the information in the model CC in regulation 1005/2008 (e.g. the lack of information on vessels in the US CC).
- A consignment covered by one CC and stored in customs warehouse before the IUU control may be split and imported over a period of time often to different MS. Parts of the consignment may also be sent to third countries. It is difficult to keep record of the amount without a common IUU IT system.
- Not notified National processing statements are used by several countries.
- USA validates CC's for fishery products sent for processing in other third- countries. These processed products are sent back to USA with an Annex IV for further processing. It means that the EU IUU control gets CC's connected to several Annex IV's which makes it impossible to control the very important parameter weight on the CC.

14.2 What changes would you suggest to the regulation that would make implementation smoother?

- Change of Article 7 (3) to include a possibility to issue a catch certificate after weighting at landing in a port.
- Common EU IUU IT-system. The key requirements for a database/IT system would ideally be:
 - Parameters for risk assessment. It is essential that enough information from the catch certificates is entered into the system to ensure a good basis for risk based control of consignments.
 - Central update of the risk parameters based on "rapid alerts".
 - Countdown of the amount of products on the individual catch certificates used for indirect import with processing, where the same catch certificate may be used several times in connection with Annex IV.
 - Countdown of the amount of products on the individual catch certificates in relation to re-export to ensure that the amount exported does not exceed the amount imported.
 - The possibility to issue certified copies of the original catch certificate when a consignment placed in a customs warehouse (not customs cleared) is split for

- import into the EU. The system must ensure countdown of the amount of products on the original catch certificate.
 - Possibility to see rejected and cancelled catch certificates and the reason for rejection/cancellation.
 - The flag state authorities must create the catch certificates directly in the IT system. Alternatively the IT system should be able to communicate directly with third countries' catch certificate databases so that catch certificates created in a specific third country would be directly transferred to the EU database. A connection to already existing electronic systems in Norway, Canada, USA, South Africa, Faeroe Islands, Iceland and Greenland could be the first goal.
 - EU export catch certificates must be created in the system.
 - The database must facilitate validation and verification of catch certificates, re-export certificates and export catch certificates.
 - There should be direct access to relevant legislation, black lists, RFMOs, etc.
 - It must be possible to create reports directly from the database - standard reports as well as individually developed ad hoc reports.
 - A connection to DG SANCO's TRACES system could be very useful. When we are dealing with import, TRACES is already a well-known system for the EU importers. A system where third countries' competent authorities have the possibility to create health certificates, that can be cloned directly into the control document (CVED) and where importers accept their responsibility for the consignment in the system.
- Annex IV form should be changed:
 - Each annex IV should be numbered with a unique number by the processing third country.
 - There should be boxes in the certificate for transport details and details on importer.
 - It should be indicated what sort of documentation the certificate should refer to in the box Health certificates if the consignment originates in Iceland, Norway or the Faroe Islands.
 - The weight declared in the Annex IV should be specified in the legislation. For example re-export CC where only a part of the original consignment has been re-exported to the processing country can be used as basis for Annex IV. The whole original weight and not the re-exported weight are used as basis.
- IUU control and veterinary border control should be done at the same place/country. It gives rise to confusion at importers and customs authorities that the controls often are done in different EU countries.
- Re-export: Denmark finds it difficult to see the benefits of the re-export control as regards the fight against IUU: Consignments are checked already at the time of entry, and are approved for free circulation, whether for direct consumption, for processing within EU or re-export without processing. The re-export approval does not add any guaranties to the third country of destination, which are not already given by the import approval. Re-exports, therefore, might as well be accompanied by the CC approved by the importing MS.
- Replacement CCs: There should be a procedure in place for issuing replacement CC in accordance with principles of the Codex Alimentarius, CCFICS guideline.

- A system for exchange of IUU Rapid Alert messages should be in place (cf. the RASFF system under DG SANCO). All MS should have online access to these messages.
- When the Commission signs agreements with third countries about electronically transferred CCs, the agreements should include MS access to information in their databases. It will make the work on verifying the authenticity of the CC easier and not as time consuming as now.
- Denmark proposes that the CC is amended:
 - Weight declaration should state the exact amount imported.
 - Transport details – box 10 – should be placed before the flag state validation.
 - There should be mutual reference between CCs and health certificates for the same fishery products. For countries where there are no demands of an accompanying health certificate there should be a reference to invoice or other accompanying documents. This information could be included in the importers declaration, if the CC is validated before the health certificate is issued.
- Denmark proposes that a task force look at improving the SMS database to make the information more easily accessible. The information in the database should of course be incorporated in a future common EU IUU IT system.
- Denmark proposes that a common official form to be used for counting down split consignments stored in customs warehouses is developed.
- Possibility for dividing the countries in to low and high risk countries. Target the control on high risk countries and give the possibility for reduced control frequency for low risk countries.
- Annex I to 1005/2008 should be reviewed. Proposals for amendment: Lumpfish roe should be removed from the list. Minor trade samples of species not regulated by a RFMO should be added to the list.
- KN code 2005 could be added to the definition of fishery products in article 2, 8) for species regulated by a RFMO and/or of high commercial value.

15. Any other comments

Denmark is missing feedback on the 2012 bi-annual report submitted to the Commission in May 2012.

Thank you for your cooperation!