

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

**Member State:** *LATVIA*

**Organisation:** *Ministry of Agriculture*

**Date:** *27.05.2014.*

**Name, position and contact details of responsible official:** *Normunds Riekstins, director of the Fisheries Department, Normunds.Riekstins@zm.gov.lv*

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

**Yes:** **X**

**Yes except for questions (list):** *no restrictions*

### 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.

*Since 02.06.2009. provisions set by the Regulation 1005/2008 as regards control and surveillance of the imported fish outside the port territory (i.e. every type of import except landings by the third country vessels which occurs in Latvian ports) are implemented in Latvia by the Rules of the Cabinet of Ministers No 503 "Regulations on Monitoring Fish Landings and Inspection of Fish Marketing and Transport Facilities, Warehouses and Processing Premises" (please, find attached in Latvian). These rules prescribe competences and order of cooperation between institutions in the case of import and export, but leaving out the setting of responsibilities to master of the third country vessel. For better cooperation in common work by involved institutions the bilateral agreement is in place since 2009 on cooperation between the Customs authority and the Marine and Inland Waters Administration (from 01.06.2013. – State Environmental Service (SES)) which has overall responsibility for fisheries control in Latvia.*

*Notwithstanding that no landings by the third countries vessels are performed in Latvian ports during the last decades the necessary provisions as regards responsibilities of the masters of third countries vessels and measures for port control as set in Chapter II of the Regulation 1005/2008 are transposed to Latvia's legal system via Rules of Cabinet of Ministers No 296 of 02.05.2007. "Regulations regarding Commercial Fishing in Territorial Waters and Economic Zone Waters". Respective amendments to this regulation were adopted on 22.01.2013. by the Rules of Cabinet No 49. In addition to that several provisions have been incorporated in proposed amendments to the Fisheries Law as regards to information on Latvian nationals on third countries fishing vessels, beneficiaries etc. Due to the administrative procedures and political issues involved in the amendments of Fisheries Law in relation to sensitive inner issues adoption of the law is still going on in the Latvian Parliament and expected shortly.*

*After Ukraine introduced obligation to have a catch certificate for the fish imported in its territory from 2013, due to the high amounts of export of the Latvian fish products to this country and many operators involved the Ministry of Agriculture (MoA) has prepared instruction guidelines to operators how to fill in the catch certificate taking into account*

*frequently asked questions, specifics of the Baltic Sea fisheries (please, see attached in Latvian).*

*Also several informative materials for the industry were distributed during 2012 and especially at very beginning of 2013 related to the new requirements of Ukraine. These materials were submitted to entrepreneurs as well as published in the web-sites of involved institutions. Furthermore the information on list of non-cooperating countries were systematically transferred to industry and updated accordingly.*

*Please, find attached copies of the relevant materials in Latvian.*

## **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.)?

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

*- Regarding catch certificates for the Latvian fishing vessels- there is only one place- the MoA that can validate certificates with no regional sub-quarters. Before the validation process each catch certificate falls under the check of necessary data - has the potential exporter hold the valid licence and quota for relevant species, % of its' exhaustion etc. In case where there are no problems in checking phase- the certificate becomes validated.*

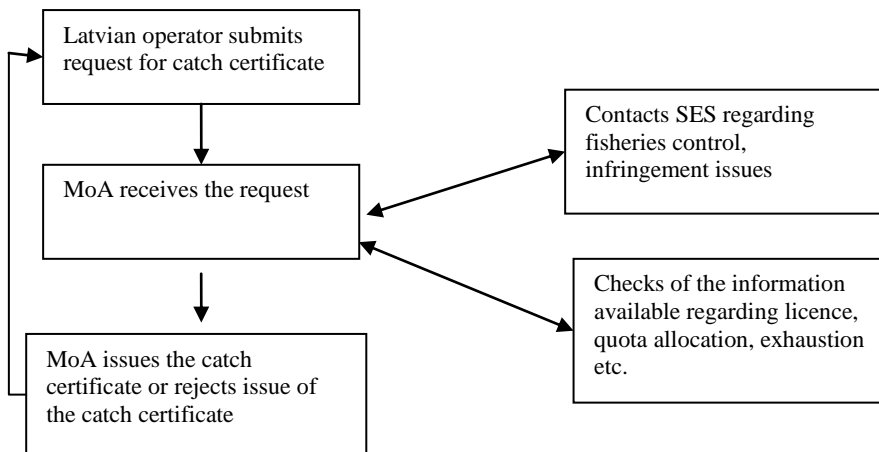
*- Regarding catch certificates issued by the third countries- also in this case only one institution- SES - and only the SES Fisheries Department (Central-office) has the powers to validate the catch certificate to allow the import into or re-export of the fish production via Latvia. Also in this case catch certificate is verified by obtaining necessary information - is the catch obtained or not by the vessel included in the IUU vessels list, crosschecked with the information submitted within the mutual assistance system, etc.*

*Internal cooperation between the Central-office and sub-quarters of SES is consist only in way of physical checks of fishing vessels flying the flag of third countries. According to the Council Regulation 1005/2008 Art. 6, third country vessels inform the competent authority- SES on intend to land the products in relevant designated port of Latvia (designated in National Rules of the Cabinet of Ministers of 02.05.2007 No 296 "Regulations regarding Commercial Fishing in Territorial Waters and Economic Zone Waters"). This intention is received by the Central-office, verified by checks of information and further provide permission or rejection for vessel entry into port. In the port the physical verification of the landing on the basis of decision made by the Central office is performed by the sub- quarter of SES located in the designated port.*

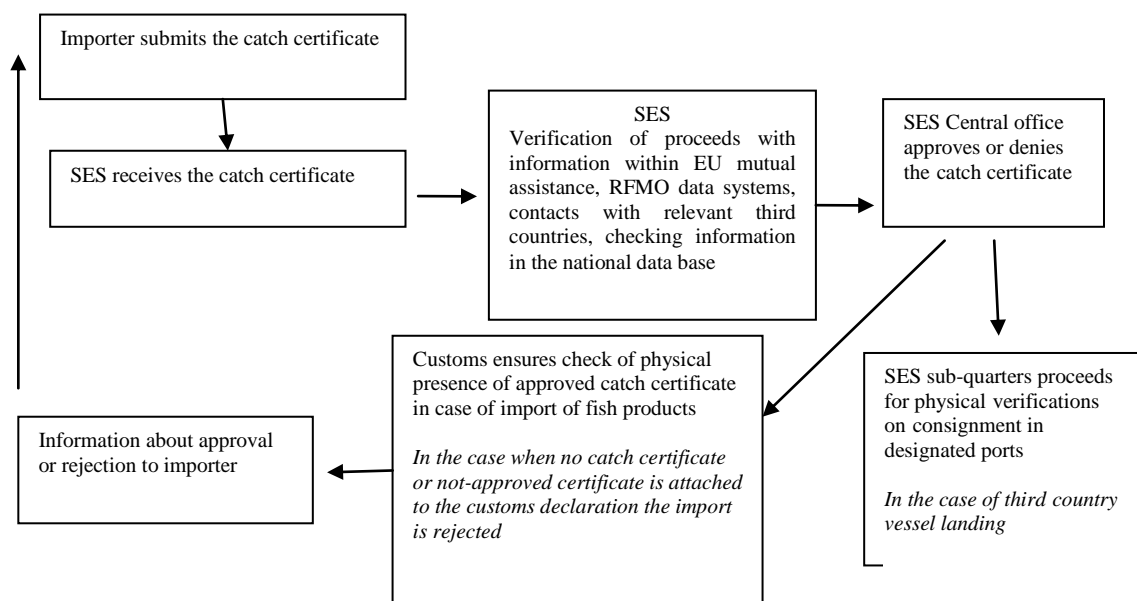
b) co-operation with other authorities and allocation of tasks for various authorities in the implementation of the IUU Regulation (Health, Customs, Navy, etc.);

*The interinstitutional cooperation has been set in the Rules of the Cabinet of Ministers as well as in the bilateral agreement between the Customs authorities and SES.*

*Scheme of cooperation in the case of export of fisheries products from Latvian vessels is as follows:*



*Scheme of cooperation in the case of import/ re-export of fisheries products from third countries*



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

*For the issue of the export catch certificate for Latvian vessels 4 persons in MoA are involved (without persons involved from entrepreneur side).*

*For the import and re-export catch certificate verification (formalities and procedures)- 3 persons in SES are involved. Regarding the physical control and verification- it depends on the situation- at least 2 persons in SES and Customs should be added to this number for implementation of the scheme. Total- at least 5.*

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

*In the case of physical control of third country vessel landing in the designated port at least one more official person should be added to the import control number. In this case total number for landing control are 6 officials.*

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.

*According to the Fishery Law and National Rules of the Cabinet of Ministers No 503 mentioned above officials of the SES has power to carry out verification of the transport, storage and production facilities in order to combat with IUU fishing. There were no any suspects within inspections held in the period from 01.01.2011- 01.01.2012. There was no information on necessity to carry out more specific inspections (no import of IUU catch etc.). However, random verifications were performed (in total 3) and that relates also to implementation of the Control regulation 1224/2009 while simultaneously combats IUU fishing.*

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

*There are 2 ports in Latvia in which relevant activities of freeports are authorised.*

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

*Please list your designated ports:  
Riga, Ventspils.*

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
Total	-	--	-	--

*\* 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?

*Unfortunately such information is not counted out from the system due to the big amount of transit interactions via ports and by land in Latvia and lack of resources for respective data processing and accountability.*

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.);

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.

*No third countries fishing vessel transhipments/landings in the Latvian ports. No issues in this regard.*

#### **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?

0

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

<b>Reason for inspection :</b>	<b>Flag State</b>
Sighted at sea in activities that may be considered illegal, unreported and unregulated	0
Based on the EU IUU vessel list	0
Other (please detail)	0

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

*None*

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

YES X \_\_\_\_\_ NO \_\_\_\_\_

If yes, please detail.

*There are the risk assessment criteria elaborated by SES for the port inspections to control the Latvian vessels as well as EU member states vessels landings. The criteria are set taking into account landing amounts of species under the recovery plan, proportion of the fleet using this particular port etc., as well behaviour of the certain vessels (penalty points, included/not included in IUU “black list” etc.). This risk assessment has been included in the state information system “Latvian Fisheries Integrated Control and Information System” LFICIS, therefore surveillance of the most risky points has become more efficient. As there were no landings from the third countries vessels, no problems were identified and specific criteria have not been adjusted for the port inspections for third countries fishing vessels.*

4.5 Has your country detected any infringements?

YES \_\_\_\_\_ NO ☒ X \_\_\_\_\_

- If yes, how many and of what nature? Please specify.
- If yes, did your country apply the procedure in case of infringements as foreseen in article 11?

## **Section 5: Catch certification scheme for importation**

Please state your notified authorities under articles 17.8 and 21.3: *State Environment Service (SES)*.

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.

<b>Flag State \ Year</b>	<b>2012</b>	<b>2013</b>
Argentina	2	7
Canada	6	23
Chile	1	-
China	19	41
Greenland	-	2
Ecuador	2	3
Faroe Islands	2	12
Iceland	97	84
India	-	-
Indonesia	1	1
Korea	1	5
Mauritania	2	-
New- Zealand	4	-
Norway	293	303

Peru	10	17
Philippines	1	-
Russia	16	11
Seychelles	4	16
Taiwan	3	21
Thailand	9	10
Ukraine	-	3
USA	21	15
Vietnam	8	11
FS 23		
<b>Total</b>	<b>601</b>	<b>724</b>

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.

<b>RFMO \ Year</b>	<b>2012</b>	<b>2013</b>
ICCAT BFT		
Dissostichus spp. (CCAMLR)	1	
CCSBT CDS		
<b>Total</b>	<b>1</b>	

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.

<b>Processing State \ Year</b>	<b>2012 - n.a.</b>	<b>2013</b>
China		46
Seychelles		13
Thailand		2
PS 3		
<b>Total</b>	<b>n.a.</b>	<b>61</b>

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

*As the processing certificates are considered to be a part of catch/reexport certificate, all these documents are retained by the competent authorities in accordance with the national legislation.*

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

*None*

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

*None. The import of fish products in Latvia is too small to make an additional system for importers- approved economic operators. Also there was no any intension or application from importers side to get such status.*

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.

*None of the third countries requested the relevant certificate where re-export was made by the Latvian entrepreneurs, so none was validated.*

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

*As it was stated in previous answer there were no validated re-export certificates.*

*However, officials in the MoA collecting and analysing data on trade with fisheries products. As the inner market and consumption of prepared and canned fish is small (less than 10% from the total production), also the main market for this production is outside the EU- those are CIS countries, Middle East countries etc. From this the consequence can be drawn: the most part of small pelagic species like sardine, sardinella imported in Latvia after it's processing here leaves the EU. But no precise figures for information can be drawn up.*

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 ☒X\_\_\_\_\_ NO \_\_\_\_\_

If yes, please detail.

*During the 2012-2013 the work on the improvement of the state information system "Latvian Fisheries Integrated Control and Information System"(LFICIS) was held. Data as regards IUU and import catch certificates also has become an integral part of the system. The automatic mechanism for different data cross-checks and validations have been incorporated in the system, like is of imported amounts summing validated against the caught volumes, appearance of warning on black list, etc.*

*As well Customs has incorporated the catch document as an integral part in the customs declaration; therefore catch certificates are included also in their data base.*

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

*Yes, these provisions are in place.*

## **Section 6: Catch certification scheme for exportation**

Please state your notified authorities under article 15.2: *Ministry of Agriculture (MoA)*

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.

*Entrepreneur (fishing company) submits to the MoA the catch certificate with necessary data entered and signed by the master of the vessel. Officials of the MoA cheques the licence No, quota and its' exhaustion, landings and other relevant information, communicates if*



*necessary with the SES on control and infringement matters and then proceeds for signing of catch certificate. The scanned signed catch certificate is sent via email to the relevant entrepreneur (fishing company).*

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
Ukraine		-	1380
Iceland		2	3
Norway		1	
Third Country 3			
Total	--	3	1383

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.

*Information on the export of the catches obtained by Latvian vessels is collected in the LFICIS. Data are stored and validated in several levels in accordance with provisions set out in the Article 109 of the Council Regulation 1224/2009. In addition compliance of the certificate with the relevant logbook (individual situation), amounts noted in certificates should not exceed caught ones (summing up several export cases with reference to one fishing trip) are validated. As the exporters mainly are fishers and producers then also this part is included in the risk analysis.*

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

Yes.

If yes, please detail.

*Data obtained from the catch certificates are compared to the information received from the Customs and Central Statistical Bureau.*

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

No.

If yes, please detail.

## **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

*There is an internal order of the SES regarding procedure for verification. It prescribes the order of the circulation of the documents, as well actions of officers in verification process. Importer submits documents prescribed by the Council Regulation 1005/2008, as well shows the originals of invoice and if necessary veterinary certificate or packaging documents.*

*Procedure of verification:*

- *SES verifies the state of origin of cargo- crosscheck of information mentioned in the documents (invoice, certificates etc.), compliance of the catch certificate with the sample and also information regarding fishing vessel, catch origin (fishing area).*
- *If necessary SES communicates with the administration of state of origin, communicates via IUU mutual assistance.*
- *Registration and signing of the documents according to the national regulations and SES internal orders;*
- *SES confirms/denies relevant catch certificate and in the first case gives an official reference to the legality of production;*
- *Importer gets the relevant documents for submission to the Customs.*

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

*Every certificate has been verified as described in the point 7.1. above, i.e. 1325 certificates in total.*

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

YES\_\_X\_\_\_\_ NO\_\_\_\_\_

If yes, please detail.

*There is a risk assessment methodology elaborated by SES for catch certificate verification and approval. Methodology covers factors like additional verification regarding state of origin and fishing vessel (fishing activity area, IUU „black lists” etc.), verification of catch certificate validity status (check on risk of falsification). Also „valuable” species like bluefin tuna- if they would be imported- would fall under the more detailed study of documents and consignment. Information received from the Commission and via IUU mutual assistance from the other Member States are also used to identify the countries with the higher risk, e.g. the case of Ghana when UK encouraged everybody pay more attention to its issued catch certificates. This is why certificates issued by Ghana’s authorities are subject to higher risk.*

7.4 Does your country also physically verify the consignments?

YES\_\_X\_\_\_\_ NO\_\_\_\_\_

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

*If there is any reason for doubts of the compliance of consignment with the rules prescribed in the regulations there is a duty for officials to proceed for physical verification of products intended to be imported.*

## **Section 8: Verification requests to flag States**

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

*There were 2 cases during 2012 and 2 in 2013 when MIWA (from 01.06.2013. –SES) in cooperation with MoA requested the additional information regarding catch certificates from the third countries.*

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.

*Reasons were related to the Art. 17.4. a)- quality of certificates (seal etc.) In one case also the information submitted was not complete therefore the verification procedure was involved More serious case was in 2013 when the information received in IUU mutual assistance allowed to proceed with the verification in accordance with 17.4.b) with the certificate issued by Ghana.*

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?

*One case, Ghana. We sent reminder, but there was no reply.*

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

Yes.

## **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:

YES\_\_\_X\_\_\_ NO\_\_\_\_\_

<b>Reason for refusal of importation</b>	<b>2012</b>		<b>2013</b>	
	<b>Flag State</b>	<b>No.</b>	<b>Flag State</b>	<b>No.</b>
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))			Ghana	1

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

*They were destroyed as agreed with the importer operator.*

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.

*MoA considers that amount, structure and value of imported fish production is more related to the economic process, not to the introduction of IUU control measures. It should be noted that most part of the Latvia's fish production – both fish products and canned and processed fish Latvia further exports. Therefore imported fish mainly is used as raw material for diversification of production range. As there was rapid decrease in the export of Latvia's fisheries products in 2009 because of crisis in export markets, also import felt down. During the 2010 and 2011 the markets stabilized and export and import slowly goes back to the pre-crisis levels. This tendency continued also during the last years. The deficiency of raw material because of decrease of sprat quota in the Baltic Sea is the reason for increase of import for fish species (sprat, herring) because of level of production of such specific Latvia's products like canned fish "Sprats in oil" that has high demand in the CIS countries.*

*During the first 9 months of 2013 comparing with the 2012 total imported volumes of the fish production increased by 17,5% reaching 45,7 thousand tonne (total import from third countries and EU). From the third countries biggest share in import for already longer period has Norway (12,9% or 5720,8 t) and Morocco (7,9% or 3506,9 t). The imported volumes of each of other third countries can be considered as not so significant.*

*It should be stressed that Latvian inner market is quite small- average consumption for fish products is nearly 12 kg per person per year and this number decreases as the fish prices go up. Therefore the main fish products for consumption in Latvia is stemming from the Baltic Sea as the cheaper and local ones.*

## **Section 11: Mutual Assistance**

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

*Latvia has replied to all messages that were sent by the Commission with request to submit information.*

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

YES\_\_\_X\_\_\_ NO\_\_\_\_\_

If yes, please detail.

*In the case of import from Ghana MoA contacted Denmark and UK because information received via IUU mutual assistance showed that certificate submitted to Latvian competent*

*authorities were previously refused for importation in relevant countries. As no information from Ghana was taken the decision was made to verify information directly with colleagues in other Member States.*

*There was also a case when catch certificate validated by UK was presented to SES but without proper fillings and it was communicated via IUU mutual assistance.*

*Latvia also sent several questions as regards Ukraine in the beginning of 2013 as no information and instructions on application of IUU system in relevant country was received and cargos of Latvia were stopped at the border.*

## **Section 12: Nationals**

Please state your notified authorities under Article 39.4:

*SES has overall responsibility for fisheries control in Latvia and for coordinating the collection and verification of information on activities of nationals.*

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?

*Latvia has prepared the amendments to the Fishery Law to ensure that Latvian nationals provide information to SES regarding their activities related to engagement in fisheries operations with the third countries. However, due to the administrative procedure and political situation these amendments still are in proceedings and as it expected to be adopted shortly by the national Parliament.*

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

*See answer 12.1 what includes also this notification*

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.

*See answer 12.1 what includes also this type of information.*

## **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? \_\_\_\_None\_\_\_\_

Please detail.

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

*Latvia has prepared the amendments to the National Code of Penalty to adapt sanctions in the national regulations. However, due to the administrative procedure as well relation with the Council Regulation 1224/2009 regarding the fisheries control issues these amendments still are in proceedings to be adopted by the national Parliament.*

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

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?

*The main problem that Latvia faced was so far the situation with Ukraine. At the very beginning there was lack of information and instructions from the Commission on how to proceed. Cargos were stopped at the border, entrepreneurs arguing for clarifications, etc. On Latvias' opinion all efforts should be made to avoid such situations in the future.*

*When it comes to application of the Article 12 of the Council Regulation No 1005/2008 it should be noted that lack of harmonization between EU and Ukraine has made a situation of unnecessary documentation. Low Relevant Article of the Regulation covers exportation of the products under the CN codes 1604, 1605, therefore Latvia needs to issue catch certificate also when exporting canned fish to Ukraine. On the other hand Ukrainian side considers that catch certificates that accompany certain categories of fishery products (canned fish) do not fall under the scope of catch certification scheme. Thus whole process of issuing and providing the said catch certificates can be considered as unnecessary administrative workload for both the national administrations and entrepreneurs. Latvia would like to emphasize that the amount of catch certificates issued by Latvia during 2013 are **more than 1300** and according to the recent letter from Customs of Ukraine most of these catch certificates (Latvia's main export product is canned fish) are not required anyway.*

*Second aspect that can be raised is relation to possibility to multiple import of notified amount of fish products using one catch certificate several times as it is not possible to communicate every catch certificate with colleagues in other Member States. This makes the system inefficient and easy to avoid. Mutual assistance is a good tool for avoiding this but it is not sufficient.*

*As well problem that is related to obtain information from Latvian nationals if they have any interest or benefits from the fishing vessel of the third country. This is well covered by amendments to the Fishery Law however this can be still considered as an intervention of the state in a status of a private life.*

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

*Latvia would like to see changes that decrease administrative workload, especially in the cases when cooperating country doesn't ask for it, like in the case of Ukraine.*

#### **15. Any other comments**

No

**Thank you for your cooperation!**