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

Member State:	Denmark		
Organisation:	Ministry of Environment and Food of Denmark		
Date:	29 th April 2016		
Name, position and contact details of responsible official:	Landing and export Lone Agathon Jensen Deputy Fisheries Inspector The Danish AgriFish Agency (AGRIFISH) Email: iuu@naturerhverv.dk Tel.: + 45 7218 5610 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		

May the Commission	May the Commission provide a copy of this questionnaire to other Member States?		
Yes:	X		
Yes except for questions (list):			
No:			

Section 1: Legal framework

Since the last reporting exercise in 2014, has your country 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)?

If yes, please detail and provide copies.

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.

The IUU team has received the last version of the guideline to the border inspectors.

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 Danish Fisheries Monitoring Centre coordinates the internal co-operation at regional level.

DVFA

- Single Liaison Officers situated in the International Trade Division deal with
 - o Requests for verification to Flag State authorities
 - o Mutual assistance requests from the Commission and other Member States
 - o 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
 - o Import IUU control (documentary, identity and physical checks)
- Border inspection post Aalborg
 - o 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, Coast Guard, 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: 38 persons (approx. 2.0 man-years (FTE)) including administrative staff and staff carrying out inspections in ports.

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, which audits/verifications have they undertaken since the last reporting exercise in 2014? Please detail.

The possibility to audit/verify a company is laid down in the Danish law no 978 of 26.9.2008, § 117 - § 119. DVFA has not used this possibility since the 2014 report.

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

Denmark has one freeport. Relevant activities: Border inspection post. No other relevant activities.

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

Denmark's designated ports are the following:

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

3.1 How many landings and transhipments of third country vessels have been recorded by your country between 1 January 2014 until 31 December 2015?

Port name*	No. of landings	Comments	No. of transhipments	Comments
Esbjerg (NAFO, NEAFC)	0		0	
Fredericia (NAFO, NEAFC)	0		0	
Hanstholm (NAFO, NEAFC)	867		0	
Hirtshals (NAFO, NEAFC)	253		0	
Hvide Sande	0		0	
København (NAFO, NEAFC)	0		0	
Skagen (NAFO, NEAFC)	220		0	
Strandby	0		0	
Thyborøn	67		0	
Ålborg (NAFO, NEAFC)	0		0	
Århus (NAFO, NEAFC)	0		0	
Total	1.407	-	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?

No.

If yes, please detail:

- a) in which ports;
- b) the nature of problem;
- c) vessel details (name, flag, master, etc.).
- 3.4 Since January 2014, has your country refused access to its port services to a fishing vessel for activities of landing or transhipment of fishery products? Was this refusal based on the conditions of the IUU Regulation?

No third country fishing vessel has been refused access.

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 country's 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 notifications and pre-landing laid down in the Implementing Regulation (EU) No 1010/2009. For RFMO's – mainly NEAFC – the third country fishing vessels simultaneously used the RFMO PSC forms when required by the RFMO.

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

- 4.1 Between 1 January 2014 and 31 December 2015, how many fishing vessels of third countries had access to the designated ports for landing or transhipment of fishery products?
- 1.407 third country fishing vessels had access to Danish ports for landing.
- 4.2 How many fishing vessels were inspected between 1 January 2014 and 31 December 2015?

75 third country vessels were inspected.

Reason for inspection :		Flag State			
		2014		2015	
	FS	No	FS	No	
Sighted at sea in activities that may be considered illegal, unreported and unregulated					
Based on the EU IUU vessel list					
Other (please detail)	NO	37	NO	37	

Reason for inspection :	Flag State			
	20	14	20	15
	FS	No	FS	No
			FO	1

Inspections are carried out based on random selection and based on risk assessment, cf. point 4.4.

4.3 In accordance with Article 9.1, has your country carried out inspections in its designated ports of at least 5% of landing and transhipment operations by third country fishing vessels each year?

Yes.

If yes, please detail.

In 2014, 37 of 742 landings from third country vessels were inspected equalling 5 %. In 2015, 38 of 665 landings from third country vessels were inspected equalling 5.7 %.

If no, please explain.

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

Yes.

If yes, please detail.

The risk assessment criteria are the ones used in the general Danish risk assessment. Crosschecks between catch certificates including supplementary certificates for all imports and sales notes are carried out. Information about larger differences are passed on to the regional inspectorates to support their prioritisation of inspections. Masters of fishing vessels who have issues with complying with the tolerance on box weight are also prioritised.

4.5 Has your country detected any infringements between 1 January 2014 and 31 December 2015?

Yes.

If yes,

- how many and of what nature? Please specify.
 - One Norwegian vessel entered port before prior to the submitted estimated time of arrival to port. The case is pending.
- did your country apply the procedure in case of infringements as foreseen in Article 11?
 Yes.

Section 5: Catch certification scheme for importation for the purpose of the IUU Regulation 1

Please state your country's notified authorities under Articles 17.8 and 21.3.

Landing and export

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5.1 How many catch certificates were presented to the authorities of your country from 1 January 2014 until 31 December 2015?

If possible, please provide details per flag State (FS).

AGRIFISH:

Flag State \ Year	2014	2015
CA Canada	2	1
FO Faroe Islands	1	5
GL Greenland	5	3
NO Norway	734	657
Total	742	665

DVFA:

Flag State \ Year	2014	2015
AR Argentina	51	31
AU Australia	5	2
CA Canada	961	1.284
CL Chile	30	21
CN China	80	94
CO Columbia	83	53
DE Germany	69	54
DK Denmark	55	45
EC Ecuador	27	17
EE Estonia	68	30
ES Spain	237	256
FO Faroe Islands	1.216	1.210

¹ 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"

Flag State \ Year	2014	2015
FR France	150	121
GB United Kingdom	96	172
GL Greenland	1.967	1.987
ID Indonesia	63	44
IE Ireland	6	13
IN India	29	21
IS Iceland	1.628	1.958
IT Italy	0	12
JP Japan	0	2
KR South Korea	33	34
LK Sri Lanka	1	0
MA Morocco	2	5
MU Mauritius	16	40
MV Maldives	11	6
MX Mexico	1	0
MY Malaysia	1	0
NI Nicaragua	2	0
NO Norway	12.371	11.271
NZ New Zealand	65	56
PA Panama	3	3
PG Papua New Guinea	1	3
PH Philippines	88	61
PT Portugal	1	1
RU Russia	107	92
SC Seychelles	54	101
SV El Salvador	2	0
TH Thailand	176	121
TW Taiwan	10	21
UA Ukraine	4	1
US USA	581	803
VN Vietnam	84	125
ZA South Africa	3	0
UY Uruguay	0	1
Total	20.438	20.172

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.

DVFA:

RFMO \ Year	2014	2015
ICCAT BFT	0	2
Dissostichus spp. (CCAMLR)	0	0
CCSBT CDS	0	0
Total	0	2

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.

DVFA:

Processing State \	2014	2015
Year		
Canada	21	174
China	355	212
Ecuador	12	5
Faroe Islands	117	146
Greenland	92	128
Iceland	429	527
Madagascar	3	0
Mauritius	80	165
Malaysia	3	8
Norway	119	180
Papua New Guinea	61	23
Philippines	0	3
Seychelles	326	287
Singapore	0	1
Thailand	65	137
Taiwan	3	0
Ukraine	0	7
USA	62	14
Vietnam	1	0
Total	1.749	2.017

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 APEO²s has your country received and how many APEOs have been 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.

² APproved Economic Operators – IUU Regulation, Article 16 and Implementing Regulation (EC) 1010/2009, Chapter II

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 2014 until 31 December 2015? Please detail per year and, if possible, per destination country.

2014: 2134 2015: 1749

DVFA does not register country of destination.

5.8 Does your country monitor if the catches for which your country has 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?

No to both questions. DK awaits the EU IUU-IT system.

If yes, please detail.

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.

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

Yes.

If yes, please explain briefly the established procedure and answer questions 6.2 to 6.5.

The information stated in the catch certificate is validated by cross checks with VMS data, catch information from the logbook and the validity of the fishing authorisation of the vessel.

6.2 How many catch certificates did your country validate from 1 January 2014 to 31 December 2015? If possible, please provide details per requesting country/country of destination in the following table.

It is not possible to provide details per requesting country/country of destination.

	ate IUU Regulation (Art. 14.2 / Art. 15)	Ye	ear
Destination State		2014	2015
Total	Art. 15	2.338	1.636

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

No, it is a manual process using existing IT tools.

If yes, please detail.

6.4 Does your country monitor that the catches for which your country has validated Catch Certificates actually leave the EU?

No.

If yes, please detail.

6.5 Has your country refused the validation of a catch certificate between 1 January 2014 and 31 December 2015?

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.

If yes, please detail.

The procedure is specified in the guidelines to the border inspectors. All CC or Annex IV with errors, doubt about authenticity, from counties with yellow card, etc. will be sent for verification to the SLO. The SLO assesses whether the CC/Annex IV/ 14(1) should be sent for verification to the flag state/processing country/transit country.

7.2 How many catch certificates have been verified from 1 January 2014 until 31 December 2015?

All CCs from all notified Flag states except Norway and Greenland 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 and Greenland low risk countries and only 25 % of the CC's are controlled and verified if necessary. All Norwegian and Greenlandic 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 stated in 8.1.

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

Yes.

If yes, please detail.

The parameters listed in 1010/2009 article 31 and Mutual Assistance messages are used as basis for the risk assessment. The IUU control staffs is informed about this via the guideline and newsletters

7.4 Does your country also physically verify the consignments?

Yes.

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 from Norway, Iceland, Greenland and the Faroe Islands will be checked at random in campaigns.

Section 8: Verification requests to flag States

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

Flag state-third country/Year	2014	2015	Main reason for requests
Argentina	1	1	Confirmation of validity. Validity of fishing licenses. CC not stamped.
Canada	9	24	CC/annex IV invalid in the Canadian database. Wrong CN code used. Prefilled importers declaration. Weight in CC and Annex IV. Cancelled CC still valid in the database. Expired licenses. Wrong approval number for the processing plant in annex IV. CN code altered after validation. Over use of CC. CC format changed.
Chile	3	6	Attached vessel list without CC number. Not the same CC number on the attached vessel list. Attached vessel list not signed by the validating officer. Request for valid licenses. CC not filled in with name of validating authority. Transport details not complete. CC validated before requested by the exporter. Authority stamp different from the one notified.
China	1	0	Annex IV not stamped.

Colombia	3	2	License expired during the fishing trip. Tuna caught in the IATTC closure period.		
Ecuador	1	1	Tuna caught in the IATTC closure period. Transport vessel missing.		
Faroe Islands	2	5	CC missing. Valid licenses. Wrong CN code used. 14(1) missing.		
France	1	6	CC not signed. CC not stamped. CC not dated. Expired licenses. CC model different.		
Greenland	2	7	Weight in CC. All species not listed. Transport details missing. CC for FO caught fish validated by GL.		
Iceland	3	5	BFT not accompanied by correct CC. 14(1) missing. Correction letter without authority stamp. CC replaced- confirmation of cancellation of the replaced CC. Annex IV with overuse. Annex IV without details for species. Annex IV with wrong weight for catch processed.		
India	0	3	Confirmation of validity. Not notified change of address of authority.		
Indonesia	3	5	Transshipment at sea not signed. Validating officer not in SMS. Position for transshipment at sea missing. Weight of the transhipped tuna missing. Format of CC.		
Ireland	1	2	Weight per species not indicated. Wrong CN codes. No address of the authority, signature and stamp not legible.		
Italy	0	2	Expired licenses. Address of the validating authority changed. Vessel seems to have been French flagged in the start of the catch period.		
Japan	0	1	Confirmation of validity.		
Korea	2	0	Confirmation of validity. License for NZ waters requested.		
Maldives	1	3	Confirmation of validity. Missing signature of vessel master. Errors in annex for multiple vessels. Request for numbering annex with CC number. CC format different.		
Mauritius	1	1	Vessel not on the IOTC list for the catch period. Confirmation of validity.		
Mexico	1	0	The validating officer not notified.		

Morocco		1	Weight not correct. Confirmation of validity.		
New Zealand	2	0	CC not in the E Cert database. Confirmation of Korean licenses to NZ waters.		
Norway	2	8	CC not in database. 14(1) issued on cancelled IE CC. License not valid. Huge amount of sales notes behind CC. 14(1) with errors. 14(1) without CC. Annex IV with wrong weight.		
Panama	0	1	Confirmation of validity.		
Papua New Guinea	5	4	Confirmation of validity. Different vessels with same license to fish in PNG/ Kiribati/Marshall Islands/Nauru waters. Different species in CC and in captain's declaration. Request about transshipments. Vessels not on the PNG list. Annex IV without endorsement date from the authority. Confirmation of validity of "freezer vessels fish origin declaration form". Question about transshipment at sea for vessels with a fish hold capacity of more than 600 MT. Annex IV with wrong reference to CC.		
Philippines	2	3	Transshipped at sea before date of catch. Date of transshipment after date of master and witness. No reference to Freezer vessel fish origin declaration form number in transshipment at port box. Date of transshipment missing.		
Russia	4	3	Not legible stamps. Confirmation of validity. Signature of validating officer not in the SMS database. Valid licenses. Wrong IMO number for carrier vessel.		
Seychelles	2	2	2 CC with same number. Annex IV without endorsement date. Signed by the exporter after the authority endorsement. License validity.		
South Africa	1	0	Confirmation of validity.		

Spain	4	4	Name of validating officer in box 9 different from the name in box 1.Poor copies with not visible stamps-confirmation of validity. IMO number for another vessel than mentioned. Transshipment in port not correctly filled in. Licenses expired. Validating officer not in the SMS database.
Thailand	1	9	Catch area. Confirmation of validity. Annex IV with wrong weight for the CC. Signature different from the one in the SMS. Annex IV with wrong authorization number of the processing plant. No weight for each vessel. Fish caught in Myanmarlicense requested. Weight in CC wrong. Species missing in CC.
Ukraine	1	1	Annex IV's with same number. Confirmation of validity annex IV /CC.
United Kingdom	1	3	Weight in CC to high. Weight in CC to low. Validation officer not in SMS. Number of CC different format than usual.
Uruguay	0	1	CC without fishing area.
USA	41	14	Wrong species in CC. Scientific name missing. Invalid CC in database. Cancelled CC still valid in the database. CC with 2 page 1. Request for vessel name for tuna catches. Annex IV with overused CA CC. Annex IV with error.
Vietnam	3	9	CC pages missing page numbers or with wrong page numbers. Confirmation of validity. Signing officer not in the updated notification. Stamp not in the SMS database. Missing exporter signature. Expired licenses. CC number seems to have been changed.
Total	103	137	

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.

Article 17.4 a) is used. The procedures in article 17.6 are applied.

- 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?
- 2014: 3, 2015: 13. Reminders are always sent to the flag state/processing state authorities.
- 8.3 Was the quality of the answers provided overall sufficient to satisfy the request?

The answers to the requests are mainly satisfactory.

Section 9: Refusal of Importations

9.1 Has your country refused any imports from 1 January 2014 until 31 December 2015?

If yes, please provide details in the table below:

	2014		2015	
Reason for refusal of importation	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

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

The consignment (shark cartilage) was destroyed.

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

No. The importer had the right to complain, but did not use it.

If yes, please detail.

Section 10: Trade flows

Did your country note a change of imports of fishery products since the last reporting exercise in 2014? Please provide information, deriving from your country's statistical data, concerning change of trade patterns in imports of fishery products into your country.

There have been some changes in the trade patterns in the past 2 years. Catch certificates:

- We see a slight increase in EU caught fish going back to EU after processing in a third country.
- We get fewer CC from Greenland, but this is mainly due to the change of the catch validation system. Means fewer CC per consignment.
- Fish imported from Iceland, Canada, USA, Vietnam and the Seychelles are rising.
- There have been no imports of tuna from Belize and Ghana the past 2 years.
- Fish caught by Mauritius vessels are new to Denmark. Previously we only received annex IV from Mauritius.
- New imports of blue fin tuna caught by Icelandic and Norwegian vessels.

Processing countries:

- There have been fewer imports of processed fish from China and Faroe Islands, the past two years.
- The import of processed fish from Canada, Greenland, Iceland, Norway, Mauritius and possibly USA are rising.

Section 11: Mutual Assistance

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

21.

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

1.

If yes, please detail.

Refusal of importation of shark cartilage from Indonesia.

Section 12: Cooperation with third countries

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).

No.

If yes, please detail.

Section 13: Nationals

Please state your country's notified authorities under Article 39.4.

13.1 Since the last reporting exercise in 2014, 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?

No.

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

None.

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

No.

- 13.4 If yes to any of the above, how many cases has your country dealt with and which administrative or penal follow-up was given?
- 13.5 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 operation, management or ownership of fishing vessels included in the Union IUU vessel list?

No.

If yes, please detail.

Section 14: Infringements (Chapter IX of the IUU Regulation) and Sightings (Chapter X of the IUU Regulation)

14.1 How many infringements did your country record from 1 January 2014 until 31 December 2015?

1.

Please detail.

See point 4.4.

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

No.

14.3 How many sighting reports were issued by your country from 1 January 2014 until 31 December 2015?

None.

Please detail.

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

No.

If yes, please detail.

Section 15: General

- 15.1 What have been the main difficulties that your country has encountered in implementing the catch certification scheme?
 - The lack of an EU IUU IT system.
 - Weight in catch certificates. The different possibilities to fill in the weight cause troubles when comparing with other accompanying documents.
 - The control of trade samples (even very small) seems unnecessary especially in the light
 of the big discrepancies in weight (when using estimated live weight) in ordinary
 imported consignments.
- 15.2 What improvements would your country suggest to the Regulation that would make implementation smoother?

Update of Annex I to 1005/2008 needed. Among other small trade samples should be exempted.

Update of the Handbook. (We are aware that it is not regulation, but a guideline used both by the trade and the control).

Section 16: Any other comments

Denmark encourages the Commission to continue working with the common IT system connected to Traces. It is of high importance.

Denmark encourages the Commission to work for a more uniform implementation of the Regulation in the Member States. The present difference in the level of control in the different Member States could give rise to "control-shopping" for the easiest Member State to import through. A level playing field is very important for the control and for the importers.

A Commission inspection team making audits in the different Member States could be a good idea.

A revision of the Regulation is needed but Denmark recognizes the importance of using the available resources in the Commission for the subjects above.