

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

Member State:	GREECE
Organisation:	MINISTRY OF RURAL DEVELOPMENT AND FOOD DIRECTORATE GENERAL OF SUSTAINABLE FISHERIES
Date:	22/04/2016
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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.

Administrative guide by YA 1750/32219- FEK /B 475/27-3-2015 (attached).

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);

In implementing the provisions of Reg (EC) 1005/2008 and specifically regarding the procedures of control and validation of export CC, of control and approval of the import CC, the Central and Regional Fisheries Administration are involved. In procedures of inspection

and of access to third country vessels in the designated ports, the competent Port Authorities are additionally involved.

- 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.);

In procedures of the provisions of Reg (EC) 1005/2008 cooperation is developed with the veterinary and customs authorities. The tasks of inspection and access to third country vessels in the designated ports are assigned to the competent -Coast Guard Authorities.

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

The directly involved fisheries officers who handle the procedures for checking CC at a daily basis are 8 employees

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

- 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 Competent National Authorities have the ability to check and verify the companies involved on import / export of fishery products.

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

N/A

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

Please list your country's designated ports.

s/n	Regional Unit	Port	Port Code
1	PEIRAIAS	Keratsini (auction hall)	IXT
2	THESSALONIKI	Nea Michaniona (auction hall)	NMX

- 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?

No third country fishing vessel has called at Greek port since the IUU Regulation was enacted.

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

3.2 Approximately, what percentage of the third country fishing vessel landings arrives in transit in your country? **N/A**

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? **N/A**

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

Since January 2014, has your country refused access to its port services to a fishing vessel for activities of landing or transshipment of fishery products? Was this refusal based on the conditions 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.).

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

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 transshipment of fishery products? **NIL**

4.2 How many fishing vessels were inspected between 1 January 2014 and 31 December 2015?

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

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 transshipment operations by third country fishing vessels each year? **N/A.**

If yes, please detail.

If no, please explain.

4.4 Does your country use risk assessment criteria for the port inspections? **No. All third country fishing vessels should be inspected if they call at Greek port.**

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

If yes, please detail.

4.6 Has your country detected any infringements between 1 January 2014 and 31 December 2015? If yes,

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

Section 5: Catch certification scheme for importation for the purpose of the IUU Regulation¹

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

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).

Flag State \ Year	2014	Flag State \ Year	2015
AL	84	AL	76
AR	56	AR	41
AU	1	CA	126
CA	142	CL	3
CL	1	CN	287
CN	369	CV	3
EC	6	EC	10
EG	8	EG	2
ES	10	ES	3
FO	1	FO	4
FR	3	FR	3
GH	8	GH	2
ID	92	GL	6
IN	301	GR	3
IS	6	ID	93
JP	11	IN	298
KE	3	IS	13
KR	86	JP	7

¹ Article 2.11 of the IUU Regulation – "importation means the introduction of fishery products into the territory of the Union, including for transshipment purposes at ports in its territory"

LK	5	KE	2
MA	372	KR	89
MR	74	MA	364
MU	1	MR	61
MV	28	MX	33
MX	13	MY	2
NA	6	MV	17
NO	40	NA	13
NZ	39	NO	22
OM	64	NZ	32
PA	1	OM	84
PE	7	PA	3
PG	1	PE	11
PH	45	PG	2
PT	3	PH	71
RU	69	PT	1
SC	2	RU	74
SN	1280	SB	2
SV	5	SC	2
TH	46	SN	1250
TN	53	SV	1
TR	576	TH	49
TW	123	TN	26
TZ	4	TR	433
UA	2	TW	59
US	141	TZ	1
UY	5	UK	1
VN	39	US	113
ZA	91	UY	4
		VN	38
		ZA	84
SUM	4323		3924

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	2014	2015
ICCAT SWO	62	44
Dissostichus spp. (CCAMLR)		
CCSBT CDS		
Total		

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	2014	Processing State \ Year	2015
CN	309	CN	280
EC	6	CV	2
MU	2	EC	7
NZ	164	MU	1
PH	5	NO	1
SG	1	NZ	107
SV	2	PG	5
US	47	TH	62
VN	16	TR	3
TH	150	TW	25
		US	4
		VN	4
	702		501

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

Out of all inspections conducted, the processing statements correspond to the species and quantities of accompanied CC

5.5 How many requests to authorise APEO²s has your country received and how many APEOs have been authorised?

The country has not authorized APEO, there has been no application for authorization

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

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

In case of APEO authorization, the administrative measures will be implemented for the management and control, as laid down in Commission Regulation 1010/2009.

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.

We validate one re-export certificate at 2015.

5.8 Does your country monitor if the catches for which your country has validated a re-export certificate actually leave the EU?

No, this is not required by the Regulation of IUU

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

In the DIRECTORATE OF FISHING ACTIVITIES & PRODUCTS a simple file IT is kept to record the data of CC that accompany imports of fishery products from third countries

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, at the entry point

Section 6: Catch certification scheme for exportation

Please state your notified authorities under Article 15.2.

**MINISTRY OF RURAL DEVELOPMENT AND FOOD
DIRECTORATE GENERAL OF SUSTAINABLE FISHERIES
DIRECTORATE OF FISHING ACTIVITIES & PRODUCTS
Address: 150 Sygrou Avenue, 176 71 Athens
Our document: 4854/104321-28/9/2015**

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.

According to the procedure established for the validation of CC for export of fishery products in third countries, when required, all the data entered into the logbook, in the Landing Declaration and in the first sale statement or in the sale invoice of fishery products are examined. Even more we cross check with the ERS system.

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

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.

Destination State	IUU Regulation (Art. 14.2 / Art. 15)	Year	
		2014	2015
AL	Art. 15		88
IT	Art. 15		8
TR	Art. 15		129
Total	--		225

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

YES X NO _____

If yes, please detail.

In the *DIRECTORATE OF FISHING ACTIVITIES & PRODUCTS* a provision of a simple file IT has been made in order to keep a record of CC data that accompany exports of fishery products caught by Greek fishing vessels.

An IT file is also maintained for each BCD accompanying the marketing of BFT, by the General Directorate of Fisheries.

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

The above question for monitoring the validated CC is not an obligation under the provision of IUU Regulations

If yes, please detail.

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

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

The administration applies the following steps:

- a) *Check the Validating authority*
- b) *Check the Fishing vessels for IUU activities according to the regulations of EU*
- c) *Crosscheck the species, the quantities and the CN code with the health certificate*
- d) *Check the flag State Validation Authority (stamp of the authority, the name and the signature (if possible) of the person who validate the Catch Certificate)*
- e) *Crosscheck the exporter with the Bill of landing/CMR/Airway bill and the health certificate and if the flag state has data base with CC, then we check this data base (eg. USA)*
- f) *Crosscheck the transport details with the Bill of landing/CMR/Airway bill*

If yes, please detail.

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

Almost all

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

YES X NO

If yes, please detail.

We use the criteria laid down of the Article 31 of Commission Regulation 1010/2009.

7.4 Does your country also physically verify the consignments?

YES NO X

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

Section 8: Verification requests to flag States

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

We had send 102 requests for verifications to various 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.

- a. **non-updated data authorities and incomplete information (address , No fax, email etc)**
- b. **Incomplete data for the Vessel (name, registration no, IMO etc., period of the validity of the fishing license)**
- c. **Reference of the species with the local name or reference no of the CN code**
- d. **Incomplete section of the management and conservation measures in conjunction with the fishing zone**
- e. **Difference in the weight and in species between CC and Health Certificate**
- f. **Incomplete transport details**
- g. **Invalid CCs at the online Flag State system**

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?

Generally there is a relatively good feedback to the questions which we have requested. In few cases reminder was needed.

Also there was some difficulty in communication because of the relevant information in the CC and in SMS is not always accurate.

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

The answer of the requested Flag States for most countries was satisfactory. In some cases further clarification was needed by on a second request.

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:

Reason for refusal of importation	2014		2015	
	Flag State	No.	Flag State	No.
Non-submission of a catch certificate for products to be imported.			Processed at Thailand	1
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				

Reason for refusal of importation	2014		2015	
	Flag State	No.	Flag State	No.
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)				

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

YES X NO _____

If yes, please detail.

We inform the importer and the customs' and veterinary authorities, the products returned to the processed country.

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

No

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.

No significant change has observed at the trade flow. It has to be noted here that the administrative and financial cost has been increased significantly for both of importers and the public services.

Section 11: Mutual Assistance

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

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

YES X NO _____

If yes, please detail.

Our messages mainly concern the implementation of the IUU regulation. Messages sent at MARE-MUTUAL- ASSISTANCE by e-mail and other State Authorities.

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).

If yes, please detail.

Section 13: Nationals

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

MINISTRY OF RURAL DEVELOPMENT AND FOOD
DIRECTORATE GENERAL OF SUSTAINABLE FISHERIES
DIRECTORATE OF FISHING ACTIVITIES & PRODUCTS
Address: 150 Sygrou Avenue, 176 71 Athens

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?

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

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.

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? 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? Please detail.

Infringements are recorded but not stratified in violations under Chapter IX and beyond.

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

We are in the process to issue the legal acts for the administrative sanctions under article 44

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

Please detail.

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

YES _____ NO X _____

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?

- Difficulty in using the implementation platform of SMS, due to not on time and incomplete update of data from the competent authorities of the third countries authorities. This situation causes difficulties in communication and especially in emergency situations of importation of fresh fisheries products.
- No ability to control and verify: i) the listed management measures (in many cases the number of national legislation of the third countries is provided). ii) Whether there are sufficient reasons for adopting simplified CC.
- Difficulties of control and enforcement of provisions of the IUU legislation for nationals especially when these are not residents of the country or in cases they manage fishing companies that are based in third countries.
- Difficulties to control and validation of CC copies that accompany the import of fisheries products which have been processed in a third country other than the flag State when the amounts of CC and import cargo are not identified.

15.2 What improvements would your country suggest to the Regulation that would make implementation smoother?

1. The EC has to establish a secure website that provides for:
 - a) Information and contact details of third countries, not via SMS.
 - b) Data (database) regarding the monitoring of cargos that are separated within the EU or imported and re-exported as well as, import data of fishery products in the

cases of the quantities of fisheries products in the CC are not coincide with the quantities of imports and

- c) The conservation and management measures applicable to any third country and particularly the prohibition periods in order to achieve effective control of the CC.**
- 2. Creation of certain legislative provisions in order to include the following aspects:**
 - a. For the cases of import cargoes that are re-exported for processing to third countries and re-imported or separated from the original cargo in MS after their importation, the validation and verification must be occur on the second importation or during the further importation or movement in another MS. There must be an appendix in the CC with information, which should be verified by the competent authorities, regarding a) the cargos of the second importation or of any further movement within the Community, b) the transfers, c) the importer,.**
 - b. Annex IV of the CC must be completed each time when the cargo is processed even if processing takes place in MS or in the flag State.**
 - c. The possibility of returning cargos to the export country.**

Section 16: Any other comments

Thank you for your cooperation!