

ISSUE BRIEF

Improving performance in the fight against illegal, unreported and unregulated (IUU) fishing

Spain – Leading implementation of the EU's Regulation to combat illegal fishing



Unloading, Las Palmas Port. © EJF

A review of member state implementation of the EU IUU Regulation¹

Executive summary

Spain is one of the EU's leading players in the fishing industry, being the top importer of seafood in the EU, and one of the top five importers globally. In addition to its role as a market and processing hub, Spain exerts a major influence in global fisheries as flag State to the majority of EU distant water vessels and through Spanish interests in vessels flagged to non-EU states and their associated supply chains. Spain is also host to key strategic ports in the international fish trade.

Since the EU IUU Regulation came into force in 2010, Spain has made significant progress in combatting IUU fishing through implementation of the Regulation's key provisions. This includes establishing rigorous, risk-based import controls to detect products originating from IUU fishing (under the Regulation's catch certificate (CC) scheme), leading to the rejection of non-compliant seafood imports at the Spanish border.

Spain has also upgraded its fisheries law in line with the EU IUU Regulation, which now provides a strong legal basis to identify and impose deterrent sanctions against Spanish interests in IUU fishing operations wherever in the world they take place. The law has since been applied in three operations targeting unauthorised fishing of Patagonian toothfish in waters regulated by the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR): Operations Sparrow I, Sparrow II and Banderas. As a result of Operation Sparrow I, Spain imposed combined penalties of almost €18 million against Spanish operators.

Given Spain's key role in securing the legal and sustainable exploitation of global fisheries, it is vital that Spanish leadership in the fight against IUU fishing is upheld. We therefore recommend that Spain continues to prioritise the full and effective implementation of the EU IUU Regulation and ensures that this policy and level of engagement is sustained over time.

When it comes to the harmonised and effective implementation of the Regulation across all member states, we also encourage other member states and the European Commission to consider examples of best practice from Spain.

¹ Council Regulation (EC) No. 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing (OJ L 286, 29.10.2008)

Introduction

As the leading importer of seafood in the EU, and one of the top five importers globally², Spain's market for seafood products has a far-reaching impact on the world's fish stocks. In addition to its role as a market and processing hub, Spain exerts a major influence in global fisheries as flag State to a significant fishing fleet – accounting for 80% of the total number of distant water vessels in the EU³ – and through Spanish interests in vessels flagged to non-EU states and their associated supply chains. Spain is also host to key strategic ports in the international fish trade, including Vigo, the largest fishing port in the EU⁴, Las Palmas for EU-Africa trade flows, as well as Algeciras and Valencia which rank among the top ten busiest container ports in the EU⁵.

As a result, Spain has a vital role to play in the success of ambitious EU legislation to combat IUU fishing - the EU IUU Regulation. This Regulation imposes obligations on EU member states to ensure the legal origin of fisheries imports entering the EU and to take action against their nationals for involvement in IUU fishing. IUU fishing is recognised as a major threat to global food security and marine health.

Since the Regulation entered into force in 2010, Spain has made significant progress in combatting IUU fishing through implementation of key aspects of the EU IUU Regulation. This factsheet provides an overview of developments to date, and identifies best practices from the Spanish context to support harmonised implementation of the EU IUU Regulation across the EU.



Spain has targeted unauthorised fishing of Patagonian toothfish. ©TRAFFIC

² FAO (2016). *The state of world fisheries and aquaculture. Contributing to food security and nutrition for all*. Rome, 2016. <http://www.fao.org/3/a-i5555e.pdf>.

³ Scientific, Technical and Economic Committee for Fisheries (STECF) – The 2016 Annual Economic Report on the EU Fishing Fleet (STECF-16-11). 2016. Publications Office of the European Union, Luxembourg: https://stecf.jrc.ec.europa.eu/documents/43805/1481615/2016-07_STECF+16-11+++AER+2016_JRC103591.pdf.

⁴ Huntington, T., Nimmo, F., and Macfadyen, G. (2015) Fish Landings at the World's Commercial Fishing Ports, *Journal of Ocean and Coastal Economics*: Vol. 2, Article 4. DOI: <http://dx.doi.org/10.15351/2373-8456.1031>.

⁵ Ranked 5th and 6th, respectively, in 2014 based on volume of containers handled (twenty foot equivalent unit – TEU) (Eurostat).

Spain's key role – fisheries statistics

- Globally, Spain is the 4th largest importer of fisheries and aquaculture products, with an average annual percentage growth rate of 3% for the period 2004-2014⁶.
- Spain has imports of around 860,000 tonnes of fishery products covered by the IUU Regulation⁷ annually, the highest in the EU⁸.
- Key imported species include tuna, cephalopods (squid, octopus, cuttlefish), shrimp and prawns, hake and cod. Spain is one of the leading importers of canned tuna in the EU, the majority from Ecuador⁹.

- Spain had the highest number of catch certificates (CCs) received by an EU member state for 2014-2015 (105,365 CCs received).
- Spain has 230 distant water fishing vessels, the highest number in the EU. These account for 59% of the gross tonnage and 62% of the engine power of the EU distant-water fleet¹⁰.
- A large majority of the European fisheries joint ventures¹¹ with third (non-EU) countries are owned by Spanish nationals. According to national data on Spanish fisheries joint ventures, in 2015 there were 120 enterprises operating more than 320 vessels, distributed in 24 countries¹².

Implementation of the EU IUU Regulation catch certification scheme in Spain

How the system works

A key aim of the EU IUU Regulation is to prevent the entry of illegally caught fish into the EU market through establishment of a catch certification (CC) scheme. The scheme requires all fisheries imports into the EU to be certified as legal by the flag State¹³ of the fishing vessel via import documents, known as “catch certificates” or “CCs”. Member states are required to ensure these certificates are valid and must inspect at least 5% of all fish consignments landed in their ports by non-EU fishing vessels.

In addition, third countries exporting fish to the EU can face warnings (yellow cards), which may ultimately lead to exclusion of their seafood from the EU market (red card) if they are assessed as failing to combat illegal fishing in line with international requirements. This is known as the “carding” process. To date, yellow-carded countries have included major seafood exporters such as Thailand¹⁴ and Taiwan¹⁵.

As most major EU importing countries receive hundreds of thousands of tonnes of fisheries products per year,

and process tens of thousands of CCs, it is not possible for authorities to verify the legal origin of each and every consignment received. Member states are therefore required to focus enforcement resources on consignments most at risk of being derived from IUU fishing. The EU IUU Regulation provides the basis for rigorous and harmonised risk assessment procedures with which to do this¹⁶.

Implementation of member state obligations

To date, implementation of the CC scheme in certain key importing member states has been inadequate to effectively block IUU products from the EU market¹⁷. Shortcomings include the failure to apply comprehensive procedures to assess the level of risk that imports originate from IUU fishing, and to verify consignments of doubtful or suspicious legal origin. In some cases, human resources and levels of technical expertise are clearly insufficient to implement these requirements¹⁸.

Spain, in contrast, has prioritised implementation of the CC scheme and has developed rigorous import controls to detect products originating IUU fishing. Key areas of progress include the following:

⁶ Food and Agriculture Organization of the United Nations (FAO) (2016). *The state of world fisheries and aquaculture. Contributing to food security and nutrition for all*. Rome, 2016: <http://www.fao.org/3/a-i5555e.pdf>.

⁷ See Annex I to the EU IUU Regulation for the list of products excluded from the definition of fishery products for the purposes of the Regulation (currently including aquaculture products obtained from fry or larvae, live ornamental fish and species caught in freshwater, see http://eurlex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2011.05701.0010.01.ENG).

⁸ Eurostat (annual average between 2010 and 2015). Imports subject to EU IUU Regulation calculated based on methodology set out in DG MARE (2014): https://ec.europa.eu/fisheries/documentation/studies/iuu-regulation-application_en.

⁹ European Market Observatory for Fisheries and Aquaculture Products (EUMOFAP) (2015). *The EU fish market 2015 edition*: <http://www.eumofa.eu/>.

¹⁰ Scientific, Technical and Economic Committee for Fisheries (STECF) – The 2016 Annual Economic Report on the EU Fishing Fleet (STECF-16-11). 2016. Publications Office of the European Union, Luxembourg. https://stecf.jrc.ec.europa.eu/c/document_library/get_file?uuid=f519adc4-c5cf-4b0a-9fd5-0dd7b3108974&groupId=43805.

¹¹ Contractual relationships between EU fishing companies and local partners in a third

country, through which EU fishing vessels are transferred to the fleet of the third country and are allocated fishing opportunities in its waters.

¹² European Parliamentary Research Service (EPRS) (2015), *Beyond European Seas: The External Dimension of the Common Fisheries Policy*. November 2015: [http://www.europarl.europa.eu/RegData/etudes/IDAN/2015/571323/EPRS_IDA\(2015\)571323_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/IDAN/2015/571323/EPRS_IDA(2015)571323_EN.pdf) at p. 19.

¹³ The flag State is the State in which a vessel is registered and holds the primary responsibility over the vessel.

¹⁴ http://eurlex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2015.142.01.000701.ENG.

¹⁵ http://eurlex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2015.324.01.001701.ENG.

¹⁶ Article 17 of the EU IUU Regulation.

¹⁷ See, for example: http://www.iuuwatch.eu/wp-content/uploads/2015/07/IUU_Germany_Brief_ENG.1.pdf and <http://www.iuuwatch.eu/2017/03/analysis-member-states-progress-implementation-import-controls-iuu-regulation/>.

¹⁸ See http://www.iuuwatch.eu/wp-content/uploads/2015/06/IUU_Germany_Brief_ENG.1.pdf and http://www.iuuwatch.eu/wp-content/uploads/2015/06/IUU_Netherlands_Brief_ENG_4pp-NEW-low.pdf.

Risk-based assessment of CCs: 100% of import CCs received by the Secretaría General de Pesca (SGP) – Spain’s Single Liaison Office for EU IUU Regulation implementation – are subject to comprehensive checks for potential irregularities. In addition, over 20 risk criteria are applied to detect consignments associated with a high risk of originating from IUU fishing (e.g. catches from vessels or countries with a history of illegal activities, and species of high commercial value or subject to management or recovery plans).

High-risk consignments, and cases of doubt or suspicion, are verified by SGP. Depending on the issue identified, SGP may decide to contact the importer, flag State or country of processing for further information. SGP has found that establishing dialogue with third country authorities increases the likelihood of detecting cases of IUU fishing. Although no threshold is set out in the EU IUU Regulation, SGP aims to carry out third country verifications for at least 1% of CCs each year. Information requested generally includes vessel monitoring system (VMS) data, and logbook and fishing licence information¹⁹. To complement this approach, SGP implements a regime of random verifications of lower-risk consignments.

A key feature of Spain’s risk analysis system is the strategic monitoring of CC data and the analysis of trends, to ensure broader patterns and shifts in trade are detected. Spain has employed a full-time data analyst to identify changes in trade flows that might indicate sources of IUU fishery products²⁰. The results of these analyses are fed back into the risk assessment process²¹.

Human and technological resources: Spain has established an online, “one-stop shop” for effective coordination of fisheries import controls across relevant parts of the administration. This allows inspections by fisheries, customs, health and trade authorities to take place during a shorter time span, and provides access to accompanying documents (invoices, customs documents, etc.) to facilitate checks of legal origin²².

Spain has employed especially trained officials for the implementation of robust checks and verifications of CCs. Initial documentary checks of import CCs are carried out by a team of 20 employees, with a further 5-6 officials working, amongst other tasks, on more detailed verifications. Around 80% of files are resolved

in less than a day, each of which may relate to one or several CCs²³. In addition, a total of 70 fisheries inspectors trained on IUU fishing issues are present nationwide at designated ports to inspect landings by third country vessels, and to carry out inspections of freight consignments, e.g. at container ports or airports, as needed.

A national database of CC information has also been developed, further increasing the efficiency of import controls. The database automates certain checks of CCs, including cross-checks with prior CC applications, and incorporates a risk analysis tool. The database issues an alert in case an irregularity (e.g. prior use of a CC) or high-risk consignment is detected.

Effectiveness of system: between 2010 and 2015, Spain rejected a total of 121 import consignments for non-compliance with the EU IUU Regulation. This represented 35% of consignments rejected by member states during this period, despite the fact that Spain received 20% of CCs for imports into the EU. Imports into Spain are also associated with a lower risk of IUU fishing than imports into other key importing member states (see **Annex** for details).

In recent years, stricter port controls have been linked to an observed decrease in the number of refrigerated cargo vessels attempting to import fisheries products into the Spanish port of Las Palmas²⁴ - previously a documented hub for landings of IUU caught fish from West Africa²⁵.

Reporting: since 2010, Spain has submitted comprehensive data to the European Commission on implementation of the EU IUU Regulation within its territory. The level of detail allows for a more robust analysis of implementation in Spain than is possible for many other member states (see **Annex** for examples of key data gaps in member state reporting²⁶). In 2014/15, this included the number of verification requests sent to third country authorities broken down by the number of CCs concerned and the flag State or other third country (e.g. processing State) contacted.

A comparison of implementation of the EU IUU Regulation CC scheme in Spain, compared to other major EU importers of fisheries products, is provided in the **Annex**.

¹⁹ Spanish Single Liaison Office, pers. comm. to the coalition, December 2015.

²⁰ Spanish biennial report on the application of the EU IUU Regulation (2014-2015), April 2016.

²¹ See <http://www.iuuwatch.eu/2017/03/analysis-member-states-progress-implementation-import-controls-iuu-regulation/> for discussion of the importance of strategic monitoring of trade data as part of risk analysis.

²² Spanish Single Liaison Office, pers. comm. to the Environmental Justice Foundation, February 2016.

²³ Spanish Single Liaison Office, pers. comm. to the coalition, April 2016.

²⁴ https://ec.europa.eu/fisheries/documentation/studies/iuu-regulation-application_en and <http://www.iuuwatch.eu/2017/03/analysis-member-states-progress-implementation-import-controls-iuu-regulation/>.

²⁵ See, for example: <http://ejfoundation.org/sites/default/files/public/Pirate%20Fishing%20Exposed.pdf> and <http://ejfoundation.org/sites/default/files/public/report-dirty%20fish.pdf>.

²⁶ <http://www.iuuwatch.eu/2017/03/analysis-member-states-progress-implementation-import-controls-iuu-regulation/>.

Action against Spanish nationals engaged in IUU fishing

A further core component of the EU IUU Regulation requires member states to impose effective, proportionate and dissuasive sanctions on any EU individual or EU-based entity proven to have been involved in IUU fishing or related trade. This includes direct involvement, where EU-flagged vessels engage in IUU fishing, and indirect involvement where non-EU flagged vessels are traced back to EU ownership, or EU nationals benefit financially from their profits.

In 2014, Spain amended its fisheries law in response to the Regulation's requirements. The updated law provides a strong legal basis to identify and impose deterrent sanctions against Spanish interests in IUU fishing operations wherever in the world they take place, including those connected to vessels operating under "flags of convenience"²⁷ or owned by "shell" companies in tax havens. Spain has also established an intelligence team to assess potential linkages of corporations and ship-owners to IUU fishing and to investigate cases according to internal alerts and risk analysis.

Spain's updated law has since been applied in three operations targeting unauthorised fishing of Patagonian toothfish in waters regulated by the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR): Operations Sparrow I, Sparrow II, and Banderas. Sparrow I revealed clear linkages between Spanish fishing companies and four internationally blacklisted vessels



The Northern Warrior under bail in Vigo for IUU charges. © EJF

²⁷ A flag of convenience ship is one that flies the flag of a country other than the country of ownership. See <http://www.itfglobal.org/en/transport-sectors/seafarers/in-focus/flags-of-convenience-campaign/>.

²⁸ <http://www.mapama.gob.es/es/prensa/noticias/la-resoluci—n-del-expediente-de-%20la-operaci—n-sparrow-sanciona-a-9-empresas-y-7-personas-fA%C2%ADsicas-por-su-%20implicaci—n-en-la-actividad-de-buques-qu/tcm7-415229-16>.

²⁹ <http://www.mapama.gob.es/es/prensa/noticias/el-ministerio-de-agricultura-y-pesca-alimentaci—n-y-medio-ambiente-resuelve-el-expediente-de-la-operaci—n-sparrow-2-con-una-sanci—n-de-53-millon/tcm7-455467-16>.

³⁰ Vessels without nationality, i.e. with no flag State.

³¹ <http://www.mapama.gob.es/ca/prensa/noticias/el-ministerio-de-agricultura-y-pesca-alimentaci—n-y-medio-ambiente-retiene-a-dos-buques-por-la-possible-%20comisi—n-de-infracciones-muy-graves-relacionadas-tcm8-415451-16>.

– Kunlun, Yongding, Songhua and Tiantai – resulting in combined penalties of almost €18 million against Spanish operators²⁸. Under Sparrow II fines of over €5 million were issued against Spanish nationals for the management and ownership of the blacklisted vessels Viking and Seabull 22²⁹.

In 2016, Operation Banderas resulted in the detention of two apparently stateless vessels³⁰ – the Northern Warrior and Antony - that had used forged documentation to access the port of Vigo and to obtain fishing authorisations. The vessels were detained subject to the payment of bonds of over €1 million³¹. As a result, both vessels were added to the CCAMLR IUU vessel list³² at the instance of the Spanish authorities³³. A further criminal investigation, Operation Yuyus, was also initiated in coordination with INTERPOL under Project Scale against the group of companies investigated in Operation Sparrow I, with respect to alleged criminal activities such as money laundering, organised crime, fraud, as well as environmental crimes under Spanish law³⁴.

The cases above demonstrate the strong commitment of the Spanish government to prosecute nationals engaged in IUU fishing through effective implementation and enforcement of the EU IUU Regulation. The operations highlight, in particular, the importance of the following elements in achieving a successful prosecution:

- International cooperation: Spanish authorities brought together the expertise, intelligence and evidence of several other countries, including Australia, Belize, Cape Verde, Indonesia and New Zealand, as well as other actors such as NGOs³⁵.
- Deterrent sanctions: the fines imposed by the Spanish government were the highest ever imposed by an EU government with respect to IUU fishing activities. Crucially, in terms of deterrence, the penalties also included suspension of fishing permits for between 5 and 23 years, and the prohibition against access to public funds for between 5 and 26 years³⁶.
- Powers of investigation: wide powers of investigation allowed authorities to undertake inspections of company records and premises, including of beneficial owners, which were key to obtaining the evidence required. Spain's law also includes an obligation to cooperate with the authorities during inspections, which, if not fulfilled (e.g. by concealing or destroying evidence, or refusing entry to inspectors), can result in a separate infringement.

³² <https://www.ccamlr.org/en/compliance/non-contracting-party-iuu-vessel-list>.

³³ https://www.ccamlr.org/en/system/files/e-cc-xxxv_2.pdf.

³⁴ The criminal case subsequently failed following an appeal to Spain's Supreme Tribunal, which held that it could not establish jurisdiction in the case as the alleged criminal activities were committed in jurisdictions where they were not considered to be crimes: <http://www.lavozdegalicia.es/noticia/barbanza/2016/12/28/archivan-causa-contra-coyos-pesca-illegal-merluza-negra/00031482942514979565329.htm>.

³⁵ <http://iuufishing.ideasoneurope.eu/2016/03/22/operation-sparrow-eus-fight-iuu-fishing/>.

³⁶ <http://www.mapama.gob.es/es/prensa/noticias/la-resoluci—n-del-expediente-de-%20la-operaci—n-sparrow-sanciona-a-9-empresas-y-7-personas-f%C3%ADsicas-por-su-%20implicaci—n-en-la-actividad-de-buques-qu/tcm7-415229-16>.

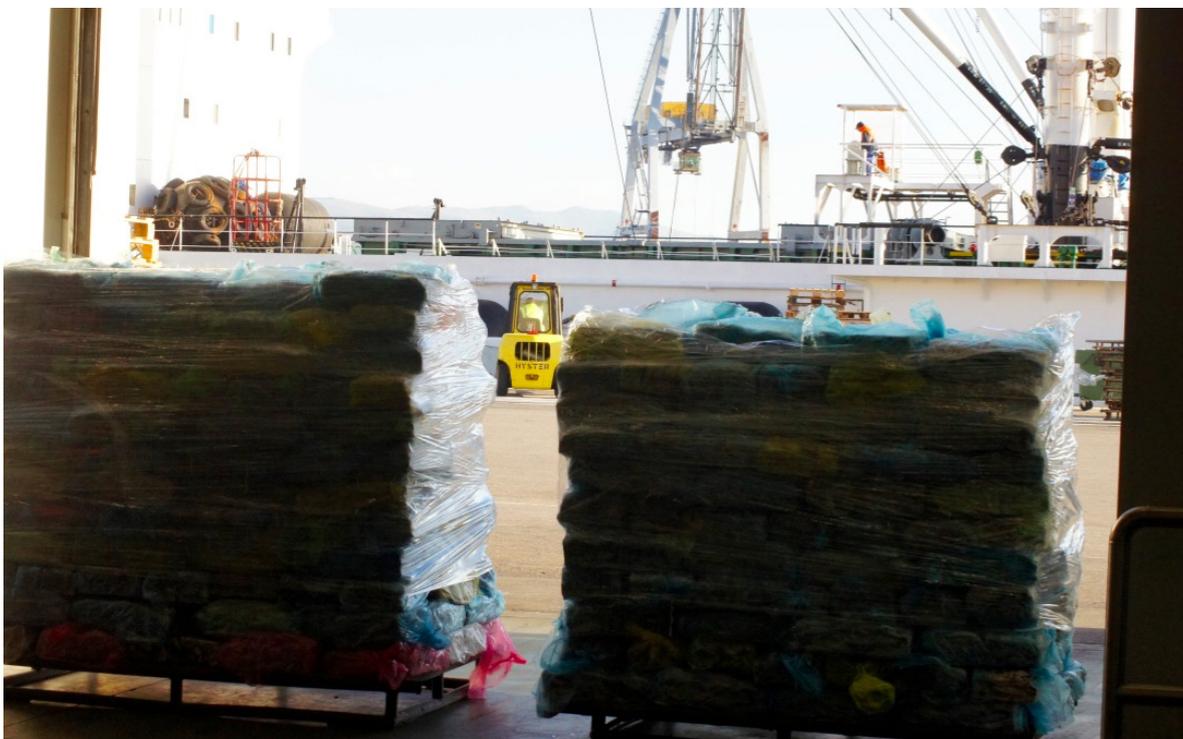
Conclusions and Recommendations

Implementation of the EU IUU Regulation in Spain has yielded significant results to date, in terms of the rejection of non-compliant seafood imports and the sanctioning of Spanish nationals for involvement in IUU fishing. Central to these successes has been the political will to deliver full implementation of the Regulation, the allocation of technical expertise and human resources to implement the CC scheme and to prosecute nationals, and intensified international cooperation between the Spanish government and third countries as part of import verifications and investigations into Spanish linkages with IUU fishing.

Given Spain's key role in securing the legal and sustainable exploitation of global fisheries, it is vital that Spanish leadership in the fight against IUU fishing is upheld. We therefore recommended that Spain continues to prioritise the full and effective implementation of the EU IUU Regulation and ensures that this policy and level of engagement is sustained over time. This includes maintaining current levels of human resources within SGP to ensure effective implementation of the CC scheme and efficient processing times, as well as current procedures and systems for the rigorous, risk-based assessment of import CCs.

We also encourage other member states and the European Commission to consider examples of best practice from Spain to inform the harmonised and effective implementation of the Regulation across all member states. To this end, we recommend that Spain:

- Continues to promote the harmonisation of procedures for implementation of the CC scheme to a minimum standard across the EU, including the application of robust documentary checks and IUU fishing risk criteria to identify consignments for verification³⁷.
- Advocates for the establishment of an EU-wide digitised database of CCs by the European Commission as soon as possible, and highlights the functions in Spain's national CC database to inform development of the new EU level system.
- Promotes best practices and experiences on the prosecution of nationals, including the application of Spain's revised Fisheries Law in the detection and investigation of Spanish interests in IUU fishing, and in the imposition of deterrent sanctions, as well as cooperation and capacity building with regard to third countries.



Unloading, Villagarcía Port. © EJF

³⁷The Environmental Justice Foundation (EJF), Oceana, The Pew Charitable Trusts and WWF are working together to secure the harmonised and effective implementation of the EU IUU Regulation. In July 2016, the NGOs published a position paper setting out recommended procedures for the risk-based assessment of CCs, which it is argued should constitute the minimum standard of implementation across all EU member states. See: <http://www.iuuwatch.eu/wp-content/uploads/2016/07/Risk-Assessment-FINAL.pdf>.

ANNEX - Statistics on implementation of the EU IUU Regulation CC scheme in key importing EU member states

The table below is based on import data from the EU's six largest importers of fishery products from outside the European Economic Area. Data are sourced primarily from activity reports submitted by member states to the European Commission under the EU IUU Regulation for the reporting period 2014-2015.

Reference to "carded countries" is to the process established by the EU IUU Regulation to identify non-cooperating third countries in the fight against IUU

fishing. Under this process, third countries exporting fish to the EU can face warnings (yellow cards), which may ultimately lead to exclusion of their seafood from the EU market (red card) if they are assessed as failing to combat illegal fishing in line with international requirements. A common reason for carding is the failure of a country to exert effective control over vessels registered to its flag. As such, the percentage of import CCs originating from carded third countries provides an indication of the risk that imports derive from IUU fishing activities.

Table 1: Fishery imports from non-EU countries by top 6 EU importers, 2014-2015*

	Imports (tonnes) subject to IUU Regulation (annual average)**	Import CCs received	Verification requests to third countries	Verification requests as % of total CCs received	Rejected consignments	Direct landings by third country vessels	Port Inspections (third country vessels)***	Import CCs from carded countries****
Spain	860,000	105,365	1,643 ⁱ	1.559%	58	320	914	3%
United Kingdom	380,000	49,313	81	0.164%	15	574	119	13%
Germany	365,000	90,000	60-70	0.078%	2	0	0	8% ⁱⁱ
Italy	350,000	57,172	2	0.003%	0	0	1	20% ⁱⁱⁱ
Netherlands	350,000	30,335	511	1.685%	1	242	17 ^{iv}	25%
France	275,000	88,345 ^v	66	0.075%	12	1130	143	6.5% ^{vi}

Notes to headings:

* Imports from outside the EU Economic Area. Grey shading indicates data for 2012/13.

** Eurostat (annual average between 2010 and 2015). Imports subject to EU IUU Regulation calculated based on methodology set out in DG MARE (2014): https://ec.europa.eu/fisheries/documentation/studies/iuu-regulation-application_en.

*** This may include vessels accessing port for reasons other than landing and transhipment.

**** Includes countries that had received a yellow card (warning) from the European Commission, or were subsequently issued with a yellow or red card due to insufficient action to combat IUU fishing. The issuing of a yellow card implies that the third country concerned is falling short in its compliance with international obligations to combat IUU fishing. As such, imports from yellow-carded countries should be afforded more detailed scrutiny. This scrutiny should be extended, wherever possible, to countries for which there are indications of shortcomings in fisheries management and control systems, even though a yellow or red card may not yet have been issued. Based on flag State information in member state reports, except where indicated otherwise.

Notes to member state data:

ⁱ Number of CCs subject to verification. This involved 1,113 requests for verification to flag and processing States (i.e. some requests concerned multiple CCs).

ⁱⁱ Estimate based on Customs data reported in Eurostat. Germany did not report data on flag States of origin of imports in its report for 2014/15 (or for the previous reporting periods). Note that Eurostat provides import data by exporting state and not by flag State of the fishing vessel. The exporting state may be the flag State, or a different non-EU country through which the products have been transported (e.g. for processing).

ⁱⁱⁱ Estimate. Italy did not provide a breakdown of flag States for 10% of CCs received in 2012/13.

^{iv} Number of landings inspected. Total of 122 port inspections in 2014/15.

^v France did not provide exact numbers of import CCs received in its 2014/15 report, but has provided estimates based on Customs import declarations.

^{vi} Based on information on country of origin contained in Customs import declarations. It is unclear whether country of origin refers to the flag State in all cases.



The Environmental Justice Foundation (EJF), Oceana, The Pew Charitable Trusts and WWF are working together to secure the harmonised and effective implementation of the EU Regulation to end illegal, unreported and unregulated (IUU) fishing. In March 2017 the NGOs published an assessment of member state progress in implementing the Regulation, compiled using an access to information request. You can find it at <http://www.iuuwatch.eu/2017/03/analysis-member-states-progress-implementation-import-controls-iuu-regulation/>.

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Swordfish consignment, Vigo Port. ©EJF