



HELLENIC REPUBLIC
Ministry OF RURAL DEVELOPMENT
& FOOD
DIRECTORATE GENERAL FOR FISHERIES
DIRECTORATE FOR FISHERIES AND
MANAGEMENT OF FISHERIES
RESOURCES

Athens, 04-02-2019
Ref. 635/20623

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2. OfficeOffice of the Deputy Minister, Mr
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3. OfficeC. Mr N. Antonoglou
4. OfficeThe Secretary-General, Mr C. Kasimis
5. GREEK PERMANENT REPRESENTATION
TO THE EU

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Subject:2018 annual report on the implementation of the landing obligation by vessels flying the Greek flag
Ref.:Ares (2018) 6366147, 11/12/2018

In view of the 2018 report on the implementation of the landing obligation, to be drawn up by the European Commission pursuant to Regulation (EU) 2015/812, and with regard compliance with that obligation by vessels flying the Greek flag, we hereby submit the following information:

For the year 2018:

(a) Small pelagic species, for which minimum size is laid down in Annex III to Regulation (EC) No 1967/2006, namely anchovy, sardine, mackerel and horse mackerel:

Commission Delegated Regulation (EU) No 1392/2014 established a discard plan, which includes de minimis exemptions on the basis of Article 15 (5) (c) of Regulation (EU) No 1380/2013. This Regulation has been replaced by Regulation(EU) 2018/161.

Under the discard plan it is permitted, by way of derogation from Article 15 (1) of Regulation (EU) No 1380/2013, to discard quantities of up to 3 % of the total annual catches of the aforementioned species caught using purse seines in the Ionian Sea. The same derogation applies to the same species caught using purse seines in the Aegean Sea and off Crete.

For bluefin tuna, which is subject to a catch limit:

Commission Delegated Regulation (EU) 2015/98 laid down a derogation from Article 15 (2) of Regulation (EU) No 1380/2013 with regard to bluefin tuna which allows by-catches by fishing vessels targeting tuna of up to 5 % of the total tuna catch per landing, in terms of the number of individuals, of a minimum size of between 8 kg and 75 kg or between 30 cm and 115 cm, to be retained on board, transhipped, transferred, landed, transported, stored, sold, etc.

(c) For certain demersal species which distinguish fisheries:

Commission Delegated Regulation (EU) 2017/86 establishes a discard plan which includes de minimis exemptions.

In accordance with the discard plan, by way of derogation from the provisions of Article 15 (1) of Regulation (EU) No 1380/2013, the discarding of up to 7 % of the total annual catches of the abovementioned species caught using trawlers in the Ionian Sea is permitted for 2018. The same derogation applies to the same species caught using trawlers in the Aegean Sea and off Crete. In addition, a derogation for the same areas and species allows discards of up to 1 % of the total annual catches of coastal vessels fishing with gillnets and trammel nets (GTN, GNS, GTR).

For swordfish, which is subject to a catch limit:

A catch limit is applied from 1-1-2017 and for Mediterranean swordfish (MedSWO) (ICCAT Recommendation 16 05). It allows by-catches of swordfish of up to 5 %, by weight or by the number of individual swordfish of the total catch per landing of a minimum size of less than 11.4 kg (whole weight) or 10.2 kg (gilled and gutted weight) or less than 100 cm in length, caught by fishing vessels targeting Mediterranean swordfish, to be retained on board, transhipped, transferred, landed, transported, stored, sold, etc. The above provisions of ICCAT Recommendation 16-05 have been incorporated into Union law by Regulation (EU) 2018/191.

Measures taken to inform interested parties:

The Directorate-General for Fisheries has issued relevant circulars informing the regional fisheries departments, the fisheries bodies and the competent inspection authorities of the provisions of Regulation (EU) No 1380/2013 as regards the landing obligation and the derogations that apply to small pelagic species and tuna. In addition, a notice has been posted on the publicly accessible webpage of the Directorate-General for Sustainable Fisheries (<http://www.alieia.minagric.gr/node/146>). Circular No 3340/68367/13-6-2016 also provided information on the imminent entry into force of the implementation of the landing obligation for the demersal species in the fisheries, from 1 to 1 2017. And a reminder was circulated with document ref. 1130/140138/29-12-2017 of 29 December 2017. Regulation (EU) 2018/161 was notified to all competent authorities and bodies concerned by means of Regulation (EC) No 548/28339/22 — **02-2018**.

Data collection

data from ERS

The electronic recording system (ERS) has been equipped with the option of recording in the fishing logbook and the landing declaration (formation of different lots) any normal and undersised quantities (and individuals, where required) of fishery products. Specifically for bluefin tuna (BFT), the recording is carried out on a weight and length per person. The following data are taken from the ERS:

i) Species subject to a catch limit

(a) Tuna (BFT)

As a result of the preliminary data available, as recorded in the electronic recording system (ERS), the quantities (live weight) of normal and undersised individuals of bluefin tuna for 2018 are as follows:

Total WEIGHT (KG) (Weight_Q)	258.606
TOTAL NUMBER OF INDIVIDUALS	4.784
Weight (kg) of normal individuals (larger than the minimum)	258.606
NUMBER OF INDIVIDUALS	4.784
PERCENTAGE OF TOTAL WEIGHT	100 % FEMALES:
PERCENTAGE OF ALL INDIVIDUALS	100 % FEMALES:
WEIGHT OF UNDERSISED INDIVIDUALS	0
NUMBER OF INDIVIDUALS	0
PERCENTAGE OF TOTAL WEIGHT	0
PERCENTAGE OF ALL INDIVIDUALS	0

(b) Swordfish (SWO)

Available preliminary data, as recorded in the electronic recording system (ERS), for the year 2018, show the quantities (landings), normal and undersised of swordfish, as follows:

Total WEIGHT (kg)	326.100
TOTAL NUMBER OF INDIVIDUALS	17.948
Weight (kg) of normal individuals (larger than the minimum)	324.596
PERCENTAGE OF TOTAL WEIGHT	99,54
WEIGHT OF UNDERSISED INDIVIDUALS	1.504
PERCENTAGE OF TOTAL WEIGHT	0,46

The competent port authorities carry out inspections on all quantities of bluefin tuna and swordfish upon landing.

It should be noted that in order to avoid the arrest of undersised individuals, by Decision No 3265/160504/7-12-2018 of the MRDF, swordfish fishing was prohibited for vessels flying the Greek flag until 31/12/2018.

ii) Small pelagic species

From available (preliminary) ERS data for anchovy, sardine, mackerel and horse mackerel for 2018, are presented below:

KIND	CODE	Catches (kg)	DISCARDS)	PERCENTAGE
ANCHOVY	ANI	13.625.434	0	0,00
HORSE MACKEREL	JAX	1.294.103	959	0,07
MACKEREL	MAC — CUT	1.746.937	0	0,00
SARDINE	PIL	11.851.072	2.421	0,02

iii) Demersal fisheries species

As already notified to the Commission in our letter ref. 1129/140137/29/12/2017, in accordance with Delegated Regulation (EU) 2017/86, establishing a discard plan for certain demersal fisheries in the Mediterranean Sea, and in particular the criteria for the landing obligation set out in the relevant Annex to the Regulation and taking into account:

- the available data, the fact that the Integrated Fisheries Monitoring System (OSPA) was implemented from 20-8-2015 and
- multispecies fishing in the Mediterranean,

none of the fishing vessels flying the flag of Greece are subject to a detailed recording requirement.

From the available (preliminary) ERS data for hake, red mullet and deep-water rose shrimp for 2018, please find below:

KIND	CODE	CATCHES (kg)	DISCARDS (kg)	PERCENTAGE (%)
COD	BURNE	2.111.847	2.090	0,10
Red mullet	MUT	1.120.734	5190	0,46
Red Shrimp	DPS	2.114.050	317	0,01

data from the National Data Collection Programme

Preliminary discard estimates for the year 2018 are set out in the following tables:

Small pelagic species

Central and Southern Ionian Sea	
GSA 20	Discards (%)
Engraulis encrasicolus	0,23
Sardina pilchardus	1,67
Atlantic chub mackerel (Scomber	0,03
Scomber scombrus	0,79
Aegean Sea	
GSA 22	Discards (%)
Engraulis encrasicolus	0,26
Sardina pilchardus	1,21
Atlantic chub mackerel (Scomber	0,12
Scomber scombrus	1,08
Combination of Aegean/Cretan Sea	
GSAs 22-23	Discards (%)
Engraulis encrasicolus	0,18
Sardina pilchardus	0,65
Atlantic chub mackerel (Scomber	0,08
Scomber scombrus	1,02

Demersal species

Central and Southern Ionian Sea	
GSA 20	Discards (%)
Merluccius merluccius	4,12
Mullus barbatus	2,53
Parapenaeus longirostris	5.1
Aegean Sea	
GSA 22	Discards (%)
Merluccius merluccius	3,97
Mullus barbatus	1.76
Parapenaeus longirostris	4.12
Combination of Aegean/Cretan Sea	
GSAs 22-23	Discards (%)
Merluccius merluccius	3,53
Mullus barbatus	1.03
Parapenaeus longirostris	3.23

Based on preliminary processing of the data, the discard rate for the species in question appear to be below the maximum limits allowed.

(IV) With the application of the derogations, it minimises the socio-economic impact as well as the impact of the landing obligation (separate stacking and separate storage areas of undersised individuals, additional personnel for their management etc.) on the safety of vessels flying the Greek flag.

As regards port infrastructure and the equipment on vessels, catches by purse seiners and trawlers will be landed in designated ports, as provided for by Article 22 of Regulation (EC) No 1967/2006, with the exception of the quantities which, by way of derogation, are allowed to be discarded. The same applies to tuna catches (Article 30, Reg.2016/1627) and swordfish (paragraph 31 of Recommendation 16-05) with the exception of those rejected.

The bluefin tuna (BFT) undersises, of a weight of 8-30 kg or 75-115 cm in length and of swordfish (SWO), of < 11.4 kg or 100 cm are available for sale, provided that the necessary requirements of Regulation (EU) 2016/1627 are met for bluefin tuna and the Recommendation 16-05 for swordfish, respectively.

Finally, the port authorities carry out regular and ad hoc inspections in application of EU legislation both at landing points and at the stage of first sale at auctions to ensure that any catches of undersised individuals are not landed. As a result of the checks, 153 infringements for 2013, 146 for 2014, 45 for 2015, for, 95 for 2016, 118 for 2017 (for 2018 have not been completed) have been established on the basis of data from the Directorate for Fisheries Control of the Ministry of Shipping and Island Policy.

Director-General

Marina Petrou
(SIGNATURE)

Attachments: Questionnaire

attachments: DGA

HRDP & DAPI & AIP: Items

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Questionnaire TO THE Implementation OF THE Implementation OF THE landing obligation for 2018

Steps taken by Member States and product organisations to comply with the landing obligation

1. Have you initiated any measures and/or studies relating to the fishing season? **Yes/ no**

Please specify the measures taken or studies.

In general, in national and international waters, in order to bring up of fish juvenes. For example in Aegean sea, according to a lower study, the permanent, 38 % of the area, and the temporal ones, 27.6 %.

Centralised, from 1 to 31 of May, has established, in an area south of the Thassos island, within territorial waters, for the protection of the juvenile *hake* (Presidential Decree 24/2018). For 2017, this restriction enforced by Ministerial Decision 1913/43489/20 04-2017, which issued for one's period

2. What are these measures and/or studies applied to?

a) **OTB, PS, longlines, handlines, TRAPS, all nets**

b) **South of Thassos island: OTB, longlines, handlines, TRAPS, Trammel nets, gilrows (PS)**

3. What has the uptake of these measures and/or studies before they are applicable?

Please use the number and release of vessels in the stocking/fishery.

Fully implemented.

In the area south of the Thassos island (on May) the previous years (2009-2016) were active with 250 coastal and 38 OTB vessels.

4. Have you initiated any changes to your quota management system to implement the landing obligation? **Yes/**

Please specify these changes.

Netaikoma

5. (I) for stocks manage through catch limits, have you accepted a quantitative analysis to identify potential national scope? **Yes/**

Please give details.

Netaikoma

6. Have you applied to the development of regional joint recommendations? **Yes/ no**

Please give details of each item.

Greece adopted with the other backing composite Forum Members (Cyprus, Italy and Malta) and with MEDAC according to the provisions of article 18 of Reg.(EC) 1380/2013, for the submission to the Commission of the Joint Recommendations for South-Eastern Mediterranean.

7. "What studies or evidence have you identified in order to support such a request".

Production receipts from National Fisheries Data Collection Program under the Data Collection Framework, ERS and data from stakeholders.

8. What are any taken under the delegated act?

Records from data collection monitoring all years, under the implementation of the Data Collection Framework.

9. What has been applied to this exemption?

Please provide the total weight and content of the data reported under this exemption for each article.

A. data from ERS for the year 2018, governing BFT landings

Total Weight (kg) (weight _Q)	258.606
Total number of individuals	4.784
Weight (kg) of normal individuals	258.606
Number of videos	4.784
Percentage on total weight	100
Weight (kg) of underied adult individuals	0
Number of videos	0
	0
Percentage on total weight	

B. Data from ERS for the year 2018, governing SWO

Total Weight (kg)	326.100
Total number of individuals	17.948
Weight (kg) of normal individuals	324.596
	99,54
Percentage on total weight	
Weight (kg) of underied adult individuals	1.504
	0,46
Percentage on total weight	

C. for the year 2018 and for the species *Engraulis encrasicolus*, *Sardina pilchardus*, *Scomber spp.* and *Trachurus spp.*:

(a) Preliminary data from ERS

Species		Quantities (kg)	Cards (Kg)	Percentage%
<i>Engraulis encrasicolus</i>	ANI	13.625.434	0	0,00
<i>Trachurus spp</i>	JAX	1.294.103	959	0,07
<i>Scomber spp.</i>	MAC-MAS	1.746.937	0	0,00
<i>Sardina pilchardus</i>	PIL	11.851.072	2.421	0,02

b) Preliminary estimates for 2018 from National Fisheries Data Collection Program under the Data Collection Framework (DCF)

Central & South Ionian	
GSA 20	% Discards
<i>Engraulis encrasicolus</i>	0,23
<i>Sardina pilchardus</i>	1,67
<i>Atlantic chub mackerel</i> (<i>Scomber mediterraneus</i>)	0,03
<i>Scomber scombrus</i>	0,79
Aegean	
GSA 22	% Discards
<i>Engraulis encrasicolus</i>	0,26
<i>Sardina pilchardus</i>	1,21
<i>Atlantic chub mackerel</i> (<i>Scomber mediterraneus</i>)	0,12
<i>Scomber scombrus</i>	1,08
GSAs 22 & 23 (combined)	% Discards
<i>Engraulis encrasicolus</i>	0,18
<i>Sardina pilchardus</i>	0,65
<i>Atlantic chub mackerel</i> (<i>Scomber mediterraneus</i>)	0,08
<i>Scomber scombrus</i>	1,02

The preliminary data processing from both ERS and DCFR, shows that the agent rate for these species is below the upper limit.

For the species *Merluccius merluccius*, *Mullus barbatus*, *Parapenaeus longirostris*, as follows:

(a) Preliminary data from ERS

Species	Code	Quantities (kg)	Cards (kg)	Percentage%
<i>Merluccius merluccius</i>	BURNED	2.111.847	2.090	0.10
<i>Mullus barbatus</i>	MUT	1.120.734	5190	0,46
<i>Parapenaeus longirostris</i>	DPS	2.114.050	317	0,01

b) Preliminary estimates for 2018 from National Fisheries Data Collection Program under the Data Collection Framework (DCF)

Central & South Ionian	
GSA 20	% Discards
<i>Merluccius merluccius</i>	4,12
<i>Mullus barbatus</i>	2,53
<i>Parapenaeus longirostris</i>	5.1
Aegean	
GSA 22	% Discards
<i>Merluccius merluccius</i>	3,97
<i>Mullus barbatus</i>	1.76
<i>Parapenaeus longirostris</i>	4.12
GSAs 22 & 23 (combined)	% Discards
<i>Merluccius merluccius</i>	3,53
<i>Mullus barbatus</i>	1.03
<i>Parapenaeus longirostris</i>	3.23

The preliminary data processing from both ERS and DCFR shows that the dose rate for these species is below the upper limit.

10. Have any of your vessels useful the test to disease? **Yes/**

Please forward the total weight of catch of each species concerned.

No data available.

11. For stocks managed by catch limits, detail your use of the provisions for individual or inter-species? **Yes/ no**

Please identify which flonicamid (or flonicamid) was used, and the corresponding allocation of fishing opportunities concerned.

Not Applicable

12. In the development of joint recommendations, has consultation with Advisory Councils and other relevant stakeholder takes place? **Yes/ no**

Please outline the process of consultation with Advisory Councils.

Consultations with MEDAC, according to article 18 of Reg. 1380/2013.

Please outline the process of consultation with other stakeholders, if relevant.

Consultation with national associations of vessels

13. Following the adoption of the delegated act for a discard plan, have you been following the adoption of the obligations under the provisions of the act? **Yes/no**

Please outline the fact that it will apply to them.

Circulars to Regional Fisheries Authorities and Port Authorities, in order to inform all stakeholder and relevant allocation to the open access website of the Directorate General for Fisheries.

14. Are any other steps that you have carried out to comply with the provisions of the landing obligation? **Yes/ no**

Please specify the measures taken.

Table to the user to register uncleared catches on a separated column in ERS. Shaping of separate lots

15. What do these studies/pilots have applied to?

Applicable to the quality of the fishing fleet

16. What has the uptake before of these measures in the fleet-cuts/fisheries to which they are applicable? Please use the number and release of vessels in the stocking/fishery.

Steps taken by Member States regarding control of compliance with the landing obligation

17. Has information before provided by Member States and control agencies to fishery **Yes** /no

In what is this information taken:

- Initiatives direct to fishery compliance;
- Guidelines on the application of the landing obligation, etc.;
- **Other (see question 13)**

18. Have guidelines affixed by Member States and control agencies for sectors? **Yes** /no

In what is this information taken:

- Delivery of the effective and uniform application of the landing obligation;
Yes
- Interpreters and seminars organised for presenting the guidelines to national and regional level. **Yes**

19. Have new control and monitoring tools been used by Member States; **Yes** /no Please supply information on:

- Control tools used in the context of landing obligation, **Yes**
- Steps towards implementation of new tools, including electronic monitoring means obtained by implementation of landing obligation, etc.

20. Have the Member state administration and control authorities **Yes**/ no

Please provide information on:

- Total number of panels (by fishery, fleet segment) from 2013 to 2018;
- Initiatives taken to prevent under mcrs from meeting the commercial documents;
- Measures taken to monitor at fish markets/ones adopted.

Land at designated ports (Regs 1967/2006, 2016/1627 and ICCAT Rec. 16-05), inspections.

21. Has control and monitoring before risk assessment **Yes**/ **no** Risk assessment will be implemented for the control since 2019.

Please supply information on the risk assessment tools used and the results obtained, including those implemented by the regional Control Expert Groups in cooperation with EFCA.

22. Has the "last completed haul" approach adopted by EFCA as a tool for monitoring the implementation of the landing obligation for inspection before used **Yes**/

No information available

Please give details of the fisheries covered and the extent of sampling.

Information on the economic impact of the landing

23. Using the most appropriate indicators defined below, provide information on the society impacts on:

- The switching sector;
- Upstream businesses;
- Processes?
- Consumption and markets;
- Costs for Member States.

Disproportionate cost of uncovered catches. Difficult to transfer these from border and island regions, stand of adequate transport means, the duration of which will result in a disproportionate cost, compared to the benefit. Moreover, given the verand the obligation to transfer the animal products with special vehicles (according to the law), we should Construct special facilities and maintenance infrastructures at all landing points, which are unlimited and deferred in Greece, for purposes other than human consumption. This, apart from the basic interfaces problem and, thus, Inability to collect on a regular basis, increases the operating costs. For the collection and processing of the above data, a relevant market research input.

Information on the economic impact of the landing

24. Have there been any reports of overloading of vessels falling stability problems? Yes/ **No** Please specify the number and nature of such documents. Can you animal length in terms of:

- Number of aths or serious injures;
- No of vessels involve as a% of the specific fleet-ment.

Netaikoma

25. Have there been any reports of the origin of which has been given to port at any time to return to port early? Yes/ **No** Please specify the number and nature of such documents.

Netaikoma

26. Have there been any reported agents or accidents on board vessels that can be considered that can be appropriate to excessive workshops? **Yes/** Please specify the number and nature of such agents or accidents.

Netaikoma

27. Has any national legislation relating to safety on board vessels arising from the landing obligation certificates from the landing obligation? **Yes/** Please provide details of this legislation.

These is the national legislation, according to EU law and international conventions, but not any particular for the landing obligation.

28. Have any funding under Article 32 (Health and safety) of EMFF or Article 3 (Eligible operations on safety) and Article 6 (Eligible operations on working conditions) of Commission cleared Regulation (EU) 2015/531? **Yes/**

If yes, please specify the number of projects involved and the nature of the measures taken.

If no, have any measures before taken taken under the EMFF?

Netaikoma

Information on the use and outlet of the use and outputs of a species

29. What have become the main uses and destinations for cats below mcrrs?

Can please specify costs for the different types by species, price per tonne and associated costs for the

different outlets.

Netaikoma

30. Have you carried out any studies or pilot projects reflecting the potential uses for such catch? **Yes/ No**
Please provide details of such studies or pilot projects.

The Directorate General for Fisheries, has been a foreseen the funding for feasibility studies, by the Operational Program of Fisheries and Sea 2014-2020, concerning the exploitation of unpopulated catches, but no proposals are made.

Information on port infrastructures and of vessels with regard to the landing obligation for each fishery concerned

31. Have you provided funding under Article 38 of the EMFF for amendments on board? **Yes/**
Please specify the number, nature and total amount of outstanding projects.

Netaikoma

32. Have you claim funding under Article 43 of the EMFF for investment in the infrastructure of fishing ports, augments Halls and stores for the handling of closures? **Yes/**
Please specify the number, nature and total amount of outstanding projects.

Netaikoma

33. Have you benefit funding under Articles 68 and 69 of the EMFF for investment in marketing measures and the processing of fishery and aquaculture products? **Yes/**
Please specify the number, nature and total amount of outstanding projects.

Netaikoma

Information on the difficulties encountered in the implementation of the landing obligation and recommendations to address them

34. Please provide information on the following: Operational roles, such as:

- Avoidance and/or selectivity inefficient to avoid unlimited catches;
- Handling, storage and processing of unused catches
- Stand of funding to add fishing years, vat or port infrastructure.
- Diffusion to monitor, control and enforcement, such as:
- Point of understanding or awareness of the rules;
- Difficulties in implementing and monitoring de minimis or high sustainability exemptions?
- Implementation problems with regard to control/monitoring processes or infrastructure;
- Refusalal to carry oservers.
- Different types of fishing opportunities, such as:
- Problems re-allocating quota to cover catel Previously not landed;
- Problems with the timing or availability of quota swaps;
- Fisheries using necessary early to register problems.

Netaikoma

Questions concerning control and enforcement, added in the questionnaire sent in 2017

35. How is the effective control and enforcement of the landing prescribed, ensured

36. How free and confirmed infringements, related to the landing obligation, have been the detected at sea and at marketing?
- In cases of confirmed infringements please indicate the circumstances of the differences of the evidence and the penalties applied, including penalty points.
- Control and enforcement is performed for the total of landings and SWO species in the designated ports.