

**EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND
FISHERIES
POLICY DEVELOPMENT AND CO-ORDINATION
STRUCTURAL POLICY AND ECONOMIC ANALYSIS**

**Questionnaire to MS on the implementation of the landing obligation
Steps taken by Member States and producer organisations to comply with
the landing obligation**

1. Have you initiated, supported, participated in or implemented any measures and/or studies relating to the avoidance of unwanted catches through spatial or temporal changes to fishing behaviour (for example, studies/pilots on real time closures)? Yes/No Please specify the measures taken or studies. *Yes. The Thiinen Institute of Baltic Sea Fisheries (OF) has conducted one in-depth analysis on the role of plaice as choke species in Baltic Sea demersal fisheries, along with potential solutions. The study was issued by the European Parliament and is publicly available (at [http://www.europarl.europa.eu/RegData/etudes/STUD/2015/563399/IPOL_STU\(2015\)56339_9_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2015/563399/IPOL_STU(2015)56339_9_EN.pdf)). One aspect of the study was the avoidance of plaice through a change in the temporal and/or special pattern of fishing. The results were promising, albeit the effect on reducing unwanted bycatch were higher with technical developments (more selective gear). Also, the authors identified that the resolution of their data (mainly by ICES statistical rectangle) was not sufficient to derive clear guidelines for changed behaviour of the fishery. It is expected though that the fishery has access to data in much higher resolution.*

As said above, modified gears proved to be very effective in reducing unwanted bycatch. OF conducted a number of studies and field experiments relevant for the implementation of the landing obligation over the last 3 years in different fisheries, namely:

- the reduction of unwanted flatfish bycatch in mixed demersal trawl fisheries in the Baltic*
- the reduction of unwanted roundfish/cod bycatch in mixed demersal trawl fisheries in the Baltic*
- the reduction of unwanted bycatch in brown shrimp beam trawl fisheries in the North Sea*
- the reduction of unwanted by catch in the Nephrops fishery in the North Sea and Kattegat/Skagerrak.*

The results of these studies were very promising, specifically when it comes to improving multi-species selectivity (i.e. catching the wanted size range of the target species but excluding unwanted bycatch), either utilizing differences in morphology or in behavior of the different species. The research team focused on cost effectiveness (modifications of the gear should be as cheap as possible) and ease of practical use. In the first approach, for example, flatfish bycatch in demersal Baltic fisheries could be reduced by 80%, using a gear called FLEX, which is a modification of conventional tunnels worth less than 200 €. The sorting efficiency could even be increased to 90% with the inclusion of a rigid frame, however with a higher cost. In addition, the fisher could decide on a haul-by-haul basis whether flatfish should be caught or released. In 2016 OF successfully adapted FLEX to perform in the opposite way. The new device called I-FLEX aims at catching flatfish while reducing cod catches significantly. Also, a gear called SORTEX was developed, a system which integrates the two concepts described above. SORTEX is basically a SORTing Extension able to split

roundfish and flatfish into separate codends. The high sorting efficiency of SORTEX demonstrated in experimental fishing would enable fishermen to adapt their exploitation patterns without further modifications of their gear. For example, a fisherman could largely avoid the catches of flatfish simply by opening the lower codend during towing, while keeping the upper codend closed to catch cod. The opposite strategy could be easily done in the following haul, if a fisherman decided to catch cod avoiding flatfish.

2. Which fleet segments/fisheries do these measures and/or studies apply to?

See answer to question 1 - for the spatio-temporal changes, only the Baltic mixed groundfish fishery was analysed; the list is longer for gear modifications (as provided above).

3. What has the uptake of these measures and/or studies been in the fleet segments/fisheries to which they are applicable? Please provide the number and proportion of vessels in the segment/fishery.

Since the study for the European Parliament was conducted (in 2015), the status of Baltic cod stocks deteriorated and catch opportunities had to be reduced significantly, while the plaice stocks in the Baltic are thriving and their catch opportunities could be doubled. Focus shifted therefore from an avoidance of plaice bycatch to an avoidance of cod bycatch. This has limited the uptake of the recommendations and technical developments, but the same rules can also apply to the reduction of other species in the mix. The interest of the fishery specifically in the technical developments for flatfish reduction is high, and it appears likely that gears reducing cod bycatch will gain attraction once this bycatch becomes restrictive. This is expected to happen later in the year.

4. Have you initiated any changes to your quota management system to implement the landing obligation? Yes/no Please specify these changes.

Yes. Since 2014 Germany endeavours continuously to avoid too detailed catch rules and to replace them by general rules, for instance to accommodate for unavoidable by-catches. In cooperation with the fishing industry this works quite well as there are regular contacts with the industry on the current catch compositions in the target fisheries

5. For stocks managed through catch limits, have you conducted a quantitative analysis to identify potential national choke issues? Yes/No

Please give details.

Yes, in 2013 a so-called discard atlas on the catch data of 2012 was produced with a view to identify potential choke species. There are regular contacts with the industry on problems related to the landing obligation, the stocks concerned and by-catch allowance needed.

6. Have you pursued any exemptions to the landing obligation (either for high survival or de minimis) in the development of regional joint recommendations? Yes/No

Please give details of each exemption pursued.

Yes. As far as the German fishery is concerned, exemptions to the landing obligation both for high survival and de minimis were agreed in the regional groups for the North Sea (Scheveningen Group) and the Baltic Sea (Baltfish). The joint recommendations of these groups to that effect have been transposed by the Commission in the relevant delegated acts into applicable EU law.

7. What studies or evidence have you collected or produced in order to support such a request.

So far the requests for exemptions were presented by the most interested Member States based on studies of their relevant scientific institutions. Germany did not initiate any of these requests in particular.

8. What steps have you taken to ensure the amount discarded under granted de minimis exemptions does not exceed the permitted volume in the delegated act?

The attention of the industry is drawn regularly to its obligation to register all by-catches falling under a de minimis exemption. As there is as yet no reporting obligation to the Commission on discards under de minimis exemptions and no entry field in the electronic logbook, monitoring was organised at national level. Fishermen were advised to enter DIM in the observation field of the logbook.

9. What has been the utilisation of any granted de minimis exemptions in the fleet segment/fishery to which the exemption applies? Please provide the total weight and proportion of catch discarded under this exemption for each fleet segment/fishery to which an exemption applies.

The de minimis exemption for Norway lobster of up to 6% according to Regulation (EU) no. 2015/2440 was used by 0,6% (i.e. catch of 861.9t and de minimis of 5.3t; however data collection for 2016 is not yet finalized).

With respect to the de minimis exemption for boarfish according to Regulation (EU) no. 1393/2014 Germany discarded 4t.

10. Have any of your vessels utilised the provision to discard fish which shows damage caused by predators? Yes/No

Please provide the total weight of catch of each species discarded for each fleet segment/fishery concerned.

No.

11. For stocks managed by catch limits, did you make use of the provisions for inter-annual or inter-species flexibility? Yes/No

Please identify which flexibility (or flexibilities) was used, and the corresponding reallocation of fishing opportunities for the stocks concerned.

a. As to the inter-annual flexibility according to Article 15(9) of Regulation (EU) no. 1380/2013 the Commission transferred in 2016 remaining quotas of 2015 for all possible stocks of all Member States even without a request by Member States. As to Germany an overutilisation has occurred in 2016 for the mackerel stock MAC/2CX14.

b. So far Germany has not made use of the inter-species flexibility. Following consultations among Member States this possibility is only to be used as a last resort for the implementation of the landing obligation in view of its potential impact on the stocks. Before that all possible means as f. ex. international quota swaps should be used.

12. In the development of joint recommendations, has consultation with Advisory Councils and other relevant stakeholders taken place? Yes/No

Please outline the process of consultation with Advisory Councils.

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

Consultations with the Advisory Councils occur regularly in the preparation of a joint recommendation. It is undertaken by the incumbent chair of the different regional groups on their behalf when the draft for a joint recommendation is reasonably advanced but when there is still time to take on board any pertinent observations of the Advisory Councils. As Advisory Councils are supposed to also reflect stakeholders others than the industry itself, no other process of consultation with other stakeholders is being undertaken, nor is it considered necessary.

13. Following the adoption of the delegated act for a discard plan, have steps been taken to ensure adequate understanding among stakeholders of their obligations under the provisions of the act?

Yes/No

Please outline the process of ensuring stakeholders understand the obligations that will apply to them. *As a first step questions on the interpretation of individual articles were clarified in the regional groups. In the Baltfish group a flyer was prepared to explain the discard plans to the industry in an illustrative manner. On this basis, Germany developed its own flyers for the Baltic Sea and for the North Sea as well. Apart from that an internet portal was opened in which questions on the landing obligation can be raised. The answers to these questions are published on the internet portal. Furthermore the fisheries protection vessels as well as the competent authorities at federal and regional level are available, i.e. by way of meetings, for extensive information on the implementation of the landing obligation.*

14. Are there any other steps not covered by the questions above that you have carried out to effect compliance with the provisions of the landing obligation? Yes/No

Please specify the measures taken.

Over several years, in the cod fishery pilot projects under scientific control were undertaken for the monitoring of the landing obligation by cameras (so called fully documented fishery)

15. Which fleet segments/fisheries do these studies/pilots apply to?

Such studies were made in the segment of larger cutters targeting cod.

16. What has the uptake been of these measures in the fleet segments/fisheries to which they are applicable? Please provide the number and proportion of vessels in the segment/fishery.

As part of the fully documented fishery fishing vessels equipped with cameras were allocated additional cod quotas in line with the relevant TAC and quota regulations at the time. This concerned two vessels above 24m fishing for saithe and cod. However, with the next level of the landing obligation the possibility for allocating additional cod is not available anymore. The scientific Thünen institute analysed the data finding that the fully documented fishery system is capable of producing much more detailed data than the electronic logbook

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

17. Has information been provided by Member States administrations and control agencies to fishermen? Yes/no

In what format has this information taken:

- Initiatives directed to fishermen to improve compliance
- Guidelines on the application of the landing obligation, accurate recording of catches, etc.
- Other

Yes. On the website of the Federal Office for Agriculture and Food (BLE) www.ble.de/fischerei a flyer with an extensive explanation of the landing obligation was published. On this website there is also a link to the questions and replies portal on fisheries on the internet.

18. Have guidelines been provided by Member States administrations and control agencies for inspectors? Yes/no

In what format has this information taken:

- Delivery of guidelines for inspectors on the effective and uniform application of the landing obligation.
- Seminars and trainings organised for presenting the guidelines to inspectors at national and regional level.

Yes.

Regional workshops for inspectors were organised for the North Sea on 8-9 March 2016 and in the Baltic Sea on 5-6 October for standardising the implementation of the LO in the framework of the North Sea and Baltic Sea JDPs.

The following topics have been dealt with during the training workshop:

- Omnibus regulation*
- Discard plans*
- Guidelines for last haul inspections*
- MS Exchange of experience on the landing obligation*
- Data collection procedures*

Furthermore in 2015, upon request of Baltjish, EFCA assisted Member States in the preparation of guidelines for inspectors in the context of the introduction of the LO in the Baltic Sea. In 2017 these will be reviewed.

At national level, information flyers were conceived as guidelines both for the industry and control services. At the end of 2016 a specific seminar for inspectors was organised in Damp (Northern Germany) in which the Commission, federal and regional authorities could exchange their experiences.

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, i.e. REM, traditional systems (aerial surveillance, inspections at sea), reference fleets, etc.
- Steps towards implementation of new tools, including electronic monitoring means dedicated to implementation of landing obligation, haul-by-haul recording, etc.

The existing data bases have regularly been searched for entries on undersized fish („ bms “) as well as on discards („ dis “) and de minimis discards (“dim “). It was tried to identify areas with higher rates of undersized fish with the view of concentrating controls there.

The introduction of remote electronic monitoring (CCTV) on larger pelagic vessels is being studied. Its implementation will depend i.a. on similar actions by other Member States whose vessels are operating in the same fisheries.

20. Have the Member state administrations and control authorities monitored below Minimum Conservation Reference Size (MCRS) catches at and after landing (traceability)? Yes/No Please supply information on:

- Total number of discards (by fishery, fleet segment) from 2013 to 2016 See Annex 3

- Initiatives taken to prevent under MCRS catches from reaching the commercial channels (pre-notification of landings of under MCRS catches, etc.).

Apart from monitoring data of undersized fish (‘BMS’) by federal authorities the competent authorities of the regions (‘Lander’) surveil that undersized fish does not reach the market for direct human consumption.

- Measures taken to monitor landings at fish markets/auctions adopted.

Cross-checks of data from logbooks, landing declarations and sales notes are done with the aim to discover any possible marketing of undersized fish. The necessary controls are undertaken by the regional authorities.

21. Has control and monitoring been based on risk assessment? Yes/no 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.

Yes

In cooperation with the JDP Steering Group and the regional Control Expert Group (CEG) of the Scheveningen Group and Baltfish, EFCA developed a methodology for risk assessment. The methodology follows the structure of weighing the likelihood of occurrence of noncompliance against the potential impact on the stock.

In order to be able to perform this risk assessment for the fisheries concerned, EFCA has produced factsheets by fleet segments to compile and update all relevant information available for each fishery. Fisheries segments were defined together with the CEGs and the Steering Groups. These fact sheets contain descriptions and tables on: gear, target species, discarding, fishing season, fishing vessels flag states, fishing areas, stock status, allocation of the TAC, applicable regulations, catches in previous year and risk characterisation.

During a joint session between experts nominees by the CEGs and members of the Steering Groups, the risk assessment was performed by fleet segment for non-compliance with the LO for the JDP species and in the North Sea additionally for fisheries identified in a request of the Scheveningen CEG (other demersal species in the North Sea). The outcome of the risk assessments (annex 1 for the North Sea and annex 2 for the Baltic Sea) has been a key input for the recommendations developed by the regional CEGs and for the planning of the JDPs in both areas.

Also on national level control and monitoring have been based on risk assessment. Where new potential risks were identified that were not linked to a particular data basis, new data bases were established. This analytical evaluation has been conceived for permanent evolution and the possibility for easy modifications as the identified risk scenarios and the fisheries rules are subject to permanent changes

The risk scenarios of individual vessels is being analysed with separate data bases which are incorporated in a so-called Live Rating System in a modular form. Each of these analysis modules issues risk points for vessels with noticeable results which relate to the identified risk using traffic light colours.

The following risks are analysed:

- overshooting of the tolerance margin*
- JDP results*
- results of other control activities*
- catch evaluation*
- fishing in closed areas*
- misreporting of catch areas*
- tempering with engine power*
- results of last hauls*
- evaluation of various observations of inspectors relating to risks in inspection reports (f. ex. "amount of discards is not logical")*

On the basis of this Live Rating System a list of negative high scores is established in which the individual results are incorporated. As a consequence this high score list is related to an individual fishing vessel and takes stock of its actual risk level. Consequently every fishing vessel can rise or fall on this list in line with its identified catch behaviour.

The so-called „ target lists “in view of common controls with other Member States result from the outcome of this system. When the risk is not real anymore the vessel is immediately deleted from the “target list”. However, it continues to appear in the Live Rating list.

The results of the Live Rating system can also be applied to a fleet segment. In this context the system uses several levels from “low” to “high”. This way the highest possible flexibility in the risk analysis and a better use of the system is achieved.

22. Has the “last observed haul” approach elaborated by EFCA as a tool for monitoring the implementation of the landing obligation and to derive potential targets for inspection been used?

Yes/No

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

Yes

The last observed haul methodology has been developed to:

- *Estimate the likelihood of non-compliance with the provisions of the LO for risk assessment,*
- *Share information between MS on catch composition rates across the different fisheries segments and*
- *Facilitate the evaluation of compliance with the LO provisions.*

This is implemented through the JDP in cooperation with the Member States inspection services.

The data derived from the last observed haul inspections is combined with other available data on catches and discards and is being used as input for risk assessment exercises. In the medium to long term, the data collected through the last haul scheme would serve as a baseline for preparing the development of a compliance evaluation tool in the context of the landing obligation.

In the North Sea area, also gramme size and grade size analysis projects were tested for collecting catch composition data. The grade size project has been focused in this initial phase on North Sea Cod landed during the first semester of 2016. This project could use the tool of a reference fleet in the North Sea as a number of vessels have CCTV on board. The sales note figures of these vessels have been compared to those of non-CCTV vessels, showing differences in catch composition that need to be further analysed. In the medium to long term, the data collected through these schemes would serve as a baseline for preparing the development of a compliance evaluation tool in the context of the landing obligation.

For pelagic fisheries in the North Sea subject to the landing obligation, a ‘ ‘gramme size analysis’ ’ project has been implemented, as a tool for collecting catch composition data. The project was englobed in the framework of the WW JDP and the SG decided to initiate it in the Mackerel campaign in IVa in 2016. This will be continued into 2017. The gramme size analysis uses the data from the electronic logbook, production logbooks from the vessels and the sales notes, which contain information on the average gramme sizes of the fish. The goal is to develop a tool for risk assessment by comparing the size distribution in fleet segments targeting pelagic species.

In the Baltic Sea area the cooperation between Member States and EFCA in the implementation of the LO has been quite successful since it started in 2014. The last haul scheme has been embedded in the Baltic Sea JDP and the data collection is being implemented routinely by national inspectors. The data collected at regional level is shared with all MS so it can also feed national risk management programmes.

Information on the socioeconomic impact of the landing obligation

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

- The catching sector
- Upstream businesses
- Processors
- Consumption and markets
- Costs for Member States

The pelagic fisheries have low bycatch rates and do not face major challenges due to the landing obligation. A similar situation applies to the saithe fishery. The fishing pattern can be adjusted in a way that unwanted bycatch is avoided. Juvenile and mature saithe often do not occur in the same area. As the fishery is able to shift, quota choke species have not been a major issue.

A certain practice of discarding is likely to persist, mainly of undersized cod. Lowering the minimum

landing size from 38 cm to 35 cm lowered the amount of fish below minimum landing size. So far no considerable limitations to fishing activities due to the landing obligation have been observed.

Information on the effect of the landing obligation on safety on board fishing vessels

24. Have there been any reported incidents of overloading of vessels causing stability problems?

Yes/No

Please specify the number and nature of such incidents.

Can you quantify these in terms of:

- Number of deaths or serious injuries .
- No of vessels involved as a % of the specific fleet segment

No incidents are known.

25. Have there been any reported incidents of overloading of vessels forcing them to return to port early? Yes/No

Please specify the number and nature of such incidents.

No incidents are known.

26. Have there been any reported incidents or accidents on board vessels that can be attributable to excessive workload? Yes/No

Please specify the number and nature of such incidents or accidents.

No incidents or accidents are known.

27. Has any national legislation relating to safety on board fishing vessels arising from the landing obligation been amended or introduced? Yes/No

Please provide details of this legislation.

No.

28. Have you provided or received 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 Delegated Regulation (EU) 2015/531 to mitigate against potential safety issues caused by the landing obligation? Yes/No

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

No.

If no, have any measures been taken which have not been funded under the EMFF?

No.

Information on the use and outlets of catches below the minimum conservation reference size of a species subject to the landing obligation

29. What have been the main reported uses and destinations for catches below mers?

Can you quantify these catches by species in terms of volumes, price per tonne and associated costs for the different outlets such catches have been sent?

*Most undersized fish was used for the production of fish meal.
Undersized catches in 2016: In total 94t of which
25t distant water fleet: in particular pelagic species such as mackerel.
69t cutter fleet: in particular cod, but also saithe and mackerel*

30. Have you carried out any studies or pilot projects considering the potential uses for such catches? Yes/No

Please provide details of such studies or pilot projects. .

No.

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

31. Have you provided funding under Article 38 of the EMFF for modifications on board vessels for the handling of catches on board? Yes/No

Please specify the number, nature and total amount invested in such projects.

No.

32. Have you provide funding under Article 43 of the EMFF for investment in the infrastructure of fishing ports, auction halls and shelters for the handling of unwanted catches? Yes/No

Please specify the number, nature and total amount invested in such projects.

No.

33. Have you provide funding under Articles 68 and 69 of the EMFF for investment in marketing measures and the processing of fishery and aquaculture products? Yes/No Please specify the number, nature and total amount invested in such projects.

In the preceding period German fish processing companies received 697,990.92€ in funds from 2012-2015 for the establishment of a traceability system. For the current period requests for EMFF funds are administered by the regions (Bundesländer)

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 difficulties, such as:

- Avoidance and/or selectivity insufficient to avoid unwanted catches

Scientific research to improve selectivity and escape possibilities is under way. However, more selective nets are not used in all fisheries as yet. Continued research and subsequent implementation of its results in relevant EU regulations could still bring about further improvements.

- Handling, storage and processing of unwanted catches *See question 20*

- Lack of funding to adapt fishing gears, vessels or port infrastructure

There has been one project in the past for the improvement of port infrastructure. Under the new EMFF funds are available for the adaptation of fishing gear, vessels and port infrastructure.

Difficulties relating to monitoring, control and enforcement, such as:

- Lack of understanding or awareness of the rules

In the North Sea the very detailed rules of the various discard plans make it difficult for the fishermen to know which species are actually falling under the landing obligation and which exemptions, possibilities for discards, still exist.

- Difficulties implementing and monitoring de minimis or high survivability Exemptions
Indeed it is difficult for the individual fisherman to distinguish between normal discards and de minimis discards. As a consequence there were only relatively few DIM entries as also de minimis discards were often recorded as DIS.
Apart from that the possibility of de minimis discards renders the enforcement of the landing obligation substantially more difficult as the distinction between legal and illegal discards is very difficult to make in practice for the control authorities.

- Implementation problems with regard to control/monitoring processes or infrastructure (e.g. adaptation of ERS systems)
Only with the introduction of new ERS formats by the Commission as from autumn 2017 the technical conditions will exist to implement all legally required recordings. Until then in Germany all DIM entries on de minimis discards are done in the observation field. This excludes electronic processing.

- Refusal to carry observers *No such incident is known*

Difficulties in fully utilising fishing opportunities, such as:

- Problems re-allocating quota to cover catches previously not landed

As yet Germany did not have any problems of this sort. The German quota management is focused on the economically most important species with the necessary quotas for by-catches. In case of insufficient by-catch quotas it is tried to obtain additional fishing opportunities through international quota swaps or adjusting rules on by-catch to available quotas.

- Problems with the timing or availability of quota swaps

There are no problems with the timing or availability of quota swaps. The cooperation among Member States is excellent. At the end of a year, as available fishing opportunities dwindle, swaps are refused in cases of a need of the own fleet for such opportunities

- Fisheries being forced to close early due to choke problems

So far such a case has not occurred as yet. However, due to the landing obligation no target salmon could be allowed in 2015 and only partly in 2016 in Germany as there was only sufficient salmon quota as a by-catch.

Annex 1 - Risk Analysis results North Sea 2016

Code	Gear	Gear definition	Segment	Area	Risk level
NS01	TR1	Otter trawls/ Seines (OTB, OTT, PTB, SDN, SSC, SPR)	> 100 mm	IIa	Low
				IVa	Very high
				IVb	High
				IVc	Medium
NS02	TR2	Otter trawls/ Seines (OTB, OTT, PTB, SDN, SSC, SPR)	>70 and <100 mm	IVa	High
				IVb	High
				IVc	Medium
NS03	TRP	Otter trawls/ Seine (OTB, OTT, PTB, SDN, SSC, SPR)	> 32 and < 70 mm	IIia	High
NS04	TRSK1	Otter trawls/ Seines (OTB, OTT, PTB, SDN, SSC, SPR)	≥ 90 mm	IIia	Very high
NS05	TRSK2	Otter trawls/ Seines (OTB, OTT, PTB, SDN, SSC, SPR)	<90 mm	IIia	Low
NS06	BT1	Beam trawls (TBB)	> 120 mm	IIia	Medium
				IVa	
				IVb	Medium
NS07	BT2	Beam trawls (TBB)	>80 and <120 mm	IVb	High
				IVc	Very high
NS08	GN1	Fixed gears (GN)	>120 mm	IIia	Low
				IVa	Low
				IVb	Low
				IVc	Low
NS09	GN2	Fixed gears (GN)	>90 and <120 mm	IIia	Low
				IVa	Low
				IVb	Low
				IVc	Low
NS10	GN3	Fixed gears (GN)	<90 mm	IIia	Low
				IVa	Low
				IVb	Low
				IVc	Low
NS11	GT1	Fixed gears (GT)	GT	IIia	Low
				IVa	Low
				IVb	Low
				IVc	Low
NS12	LL	Fixed gears (LL)	LL	IIia	Low
				IVa	Medium
				IVb	Low
				IVc	Low
NS13	OTH	Others not included in segments 1-12	Other	IIa	
				IIia	
				IVa	
				IVb	
				IVc	

Annex 2 - Risk Analysis results Baltic Sea 2016

SEGMENT	GEAR GROUP	GEAR TYPE	AREA	RISK LEVEL
1	OT (>105)	Demersal Active	22-24	High
2	SDN (>105)	Demersal Active	22-24	Low
3	OT (>105)	Demersal Active	25-27	Medium
4	OT, PT (16< and <32)	Pelagic Active	22-27	Low
5	OT, PT (32< and <90)	Pelagic Active	22-27	Low
6	OT,PT (16< and <105)	Pelagic Active	28-32	Low
7	GN (>157)	Pelagic Passive	22-29	Low
8	LL	Pelagic Passive	22-29	Low
9	FIX (nat. rules)	Pelagic Passive	30-32	Low
10	GN (110< and <156), LL	Demersal Passive	22-24	Medium
11	GN (110< and <156), LL	Demersal Passive	25-27	Low
12	GN (32<and<110), TTTTV $t_{4, \dots, 1}$	Pelagic Passive	22-32	Low
13	Other non-reported in segments 1-12	Demersal Active	22-32	1

Discards 2013 total: 3.075

Catch Areas (FAO)	Catch areas	Name	Number of entries	Discard in kg
21.1.C	NAFO	Greenland halibut	170	7.312
27.3.C und D	Baltic Sea	Cod and flatfish fishery	1.750	187.522
27 AA und B	North Sea	Flatfish fishery	715	180.312
27.5-7	West British waters	Pelagic fishery	110	78.385
27.14.b	East Greenland	Greenland halibut and redfish	330	17.322
Discards total 2013:			3.075	470.853

Discards 2014 total: 4.219

Catch Areas (FAO)	Catch areas	Name	Number of entries	Discard in kg
21.1.C	NAFO	Greenland halibut	127	5.999
87	XIN /Free waters)	Pelagic fishery	84	23.516
27.3.C und D	Baltic Sea	Cod and flatfish fishery	2.598	520.487
27.4.A und B	North Sea	Flatfish fishery	828	197.142
27.5-7	West British waters	Pelagic fishery	139	90.836
27.14.b	East Greenland	Greenland halibut and redfish	443	19.841
Discards total 2014:			4.219	857.821

Discards 2015 total: 1.270

Catch Areas (FAO)	Catch areas	Name	Number of entries	Discard in kg
21.1.C	NAFO	Fischerei Schwarzer Heilbutt und Rotbarsch (GHL u. RED)	4	4.762
34	MAR (Marocco)	Pelagic fishery	168	262.599
27.3.C und D	Baltic Sea	Cod and flatfish fishery	768	98.466
27.4.A und B	North Sea	Flatfish fishery	155	39.795
27.5-7	West British waters	Pelagic fishery	139	44.840
27.14.b	East Greenland	Greenland halibut and redfish	36	15.272

Discards total 2015:	1.270	465.734
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Discards 2016 total: 3.322

Catch Areas (FAO)	Catch areas	Name	Number of entries	Discard in kg
34	MAR (Marokko)	Pelagische Fischerei	41	95.991
27.3.C und D	Baltic Sea	Cod and flatfish fishery	1.913	219.626
27.4.A und B	North Sea	Flatfish fishery	1.291	97.558
27.5-7	West British waters	Pelagic fishery	2	4.000
27.14.b	East Greenland	Greenland halibut and redfish	75	12.909
Discards total 2016:			3.322	430.084