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Copenhagen, 1. February
2019
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Annual report on the implementation of the landing obligation

By the letter dated 11th December 2018 (Ares (2018)6366147) Member States were asked to submit a completed questionnaire regarding the implementation of the landing obligation in 2018 in accordance with Article 15 (14) of Regulation 2015/812. The completed questionnaire will facilitate the European Commission in reporting to the European Parliament and The Council covering implementation of the landing obligation in 2018.

Please find below the completed questionnaire by Denmark, as well as our general remarks on the points outlined in the letter from the European Commission.

Steps taken by the Member State

As in the previous years, Danish Fisheries Agency continues a close cooperation with the Danish fisheries organisations in regards to the landing obligation (LO).

Amongst initiatives undertaken is a broad variety of actions such as:

- cooperation on guidelines and public information meetings in all major harbours;
- information in the weekly fishing newspaper and on the internet;
- FAQ and answers;
- meetings with industry representatives;
- seminars and training of the fisheries controllers;
- internal workshops on how to implement and define tools that can be used for control of the landing obligation
- introduction of separate logbook entries for each haul by haul captured quantity, including BMS fish;
- a risk-based control of vessels, including the risk of non-compliance with the landing obligation as a risk parameter

Control of compliance

There have been three infringement cases of the landing obligation in 2018, two of which are awaiting for decision, whilst another case is pending with the police for a fine. Two of the cases are a violation of the landing obligation in the form of discarding of BMS fish from the fishing vessel in connection with physical fisheries control at sea and in port.

In regards to the cases from 2017, one has been settled with the fishermen accepting the fine, whilst the other is currently pending in court.

The socio-economic impact

As also stated in the annual report from 2017, Copenhagen University has carried out a socio-economic analysis of the long-term consequences of implementation of the landing obligation. The results of the analysis are published in the IFRO report (2016) and indicate the presence of the economic challenges presented by the landing obligation. Fishermen continue to have an economic incentive to discard catches that are BMS fish, or to undertake high-grading of economically less attractive sale categories or species that fishermen do not have quota for. No other studies or changes have otherwise been reported.

Safety on board

No changes in safety on board observed or reported.

Outlets of catches below MCRS

Catches below MCRS are often used for fishmeal production or for animal food in the fur production. However, a big amount is disposed as garbage due to high costs of handling of the unwanted catches.

Information on port infrastructures and vessels' fittings

Under the Danish EMFF program, 4.724.579,00 € was invested in 45 projects in 2018 for modifications on board vessels for the handling of catches on board. The nature of those projects has a wide span, with some aiming to improve selectivity in size or species, while others aim to avoid and reduce unwanted catches or to handle these catches on board (sorting or storage systems).

Difficulties encountered

Denmark does not experience problems with lack of awareness of the rules by the fishermen, or difficulties implementing exemptions. Despite this general awareness of these rules, Denmark sees a need for continuing focus on the landing obligation as well as continuing intensive control of the compliance to the rules. There has been no need to close fisheries as a result of the introduction of the landing obligation. The Danish quota system has a potential to be flexible enough, combined with the possibility of quota swaps between Member States, to handle most of the unwanted catches of BMS fish. But potential choke species have been identified; ling in 3a, cod in 3a, saithe in 2a, 3a and 4, megrim in 2a and 4.

The Danish Fisheries Agency supports any regional decision to implement further control tools in order to ensure compliance, as long as the implementation ensures a level playing field.

Yours sincerely,

Nanna Møller
Director of the Danish Fisheries Agency

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.

Answer: Data currently not available, but will be able to provide at a later point in time.

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

Answer: Data currently not available, but will be able to provide at a later point in time.

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.

Answer: Data currently not available, but will be able to provide at a later point in time.

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

Answer: No. No changes were implemented.

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

Answer: Yes. A quantitative analysis has identified the following potential choke species seen from a Danish perspective: Ling in 3a, cod in 3a, saithe in 2a, 3a and 4, megrim in 2a and 4.

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.

Answer: Yes. Exemptions pursued:

- i. Intensive work with exemptions from the landing obligation in the North Sea*
- ii. Work on some new exemptions with regards to high survivability and the de minimis*
- iii. Denmark has taken an initiative towards exemptions for plaice with regards to nets, seines and trawls and has supported other exemptions*
- iv. Denmark has also initiated de minimis exemption for industrial fisheries, however the initiative was not approved by the STECF. Denmark will continue working on the initiative in 2019.*

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

Answer: Aalborg University has conducted studies on high survivability in plaice fisheries with nets, whilst the Danish Technical University (Aqua) examined the Danish seines and trawls.

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?

Answer: The electronic logbook has been adapted to include catches recorded under a de minimis exemption. Recorded data per specie and area can be aggregated and compared to de minimis reservations.

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.

Answer: The quantities of fish discarded under the de minimis has been recorded. The total weight recoded by the Danish vessels in the logbooks is shown in the figure under question 20.

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.

Answer: Yes. According to the data reported to the Danish Fisheries Agency, the quantities discarded due to predator damage was 9053 kg and 416 pcs of Cod, and 64 kg and 1009 pcs of Salmon (primary area 24, Baltic Sea) in 2018. However, we are not in possession of information on the total weight of the catch, as no EU conversion factor exists. It should be noted that reporting of damage caused by predators is voluntary for fishermen thus sporadic and limited. The actual discard of damaged species is estimated to be significantly higher.

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.

Answer: Yes, with respect to inter-annual flexibility, please find enclosed tables received from the Commission.

Inter-species flexibility in 2018 has been applied to the depreciation of some by-catches of herring in the fisheries for sprat in the Baltic Sea.

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.

Answer: Yes. The process with respect to consultation of the Advisory Councils is described in the joint recommendations. Nationally, meetings with industry representatives have been held and there has been a general consultation of relevant stakeholders. As an example the advisory council for the North Sea and the advisory council for the pelagic fisheries were invited to and attended the meetings in the Scheveningen Technical Group and the High level Group. The Advisory Councils were informed of the work in the Scheveningen regional group and had an opportunity to contribute to the group. The advisory councils were officially heard on the draft joint recommendation in April/May 2018.

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.

Answer: Yes. A set of Guidelines has been produced for each discard plan. The Danish Fisheries Administration in the Ministry of Foreign Affairs held regular meetings with the industry on the development of the joint recommendations. Following the adoption of the discard plan, meetings have been held with industry on the implementation of the plan. The Danish Fisheries Agency has released a hearing on updated guidelines on the implementation of the Landing Obligation for 2019.

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.

Answer: Yes. In 2018, Denmark has put a special effort in relation to the landing obligation. As an example, there have been workshops with the industry on how the full implementation of the landing obligation in 2019 can be best supported. In addition, the Danish Fisheries Agency has had a special focus on the follow-up controls at port after the Last Haul inspections showed a significant catch of BMS on board of a vessel.

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

Answer: Question not understood.

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.

Answer: Question not understood.

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

Answer: Yes. The following information has been provided to fishermen:

- *Guidelines on the application of the landing obligation including rules on recording of catches kept on board, discards, storage etc.*
- *Local meetings with fishermen*
- *News articles in the industry's own publications*

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.

Answer: Yes. The following information has been provided:

- *Guidelines for inspectors on the effective and uniform application of the landing obligation.*
- *Seminars and trainings where the guidelines are presented to inspectors at national and regional level.*
- *Internal workshops on how to implement and define tools that can be used for control of the landing obligation*

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.

Answer: Denmark has implemented a national regulation of haul by haul registrations in logbooks. In addition a follow-up procedure concerning landing inspection of BMS catches observed at sea is in place to ensure all observed BMS species are landed.

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 2018

- Initiatives taken to prevent under MCRS catches from reaching the commercial channels (pre-notification of landings of under MCRS catches, etc.).
- Measures taken to monitor landings at fish markets/auctions adopted.

*Answer: Yes, Denmark has monitored MCRS-catches at and after landing
Danish vessel has registered the following numbers of fish in the logbook in 2016, 2017 and 2018
(DIM= de minimis, BMS=MCRS):*

North Sea/Skagerrak/Kattegat						
Weight (kg) in logbook, DNK						
	2016		2017		2018	
	BMS	DIM	BMS	DIM	BMS	DIM
COD	3194	117	5958	414	14458	216
HAD	1101	1	528	40	1479	27
HKE	454	176	1881	64	911	82
NEP	1230	356	2035	10885	4855	21320
PLE	15322	220	17288	1331	30731	1358
POK	468		2146		1245	13
PRA	1350				480	
SOL	309		277	67	144	13
WHG	964		1606	2	3868	3413
Baltic Sea						
Weight (kg) in logbook, DNK						
	2016		2017		2018	
	BMS	DIM	BMS	DIM	BMS	DIM
COD	27872		28323		21931	
PLE	510		8560		13555	51
SAL					130	
SOL			2		25	

Undersized fish (fish under MCRS) is of little interest to the commercial market. If profitable the fish is sold to animal feed or industrial processing (fish meal).

Inspection measures performed are follow-up inspections at landing on trips, where Last haul-sampling has been performed at sea, as well as inspection at fish markets, auctions, first hand buyers of fish.

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.

Answer: Yes, the control and monitoring has been risk based. Denmark has developed a model with different scorelists, which create a risk profile for all Danish vessels. Automatically generated scorelists based on relevant data from the fishery, manually generated risk list and intelligence based on inspections. One of the scorelists is showing fishing vessels with indication of highgrading. Denmark is feeding relevant vessels into EFCA's the global targetlist, which is a part of the exchange of information in the JDP and are using the information from other MS on the target lists. Denmark has participated in relevant specific actions in BS and NS related to the LO.

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.

Answer: Last Haul sampling is an integrated part of an inspection at sea. In 2018 Danish inspectors has made 94 Last Haul-sampling from NSK – 33 of these included also highgrading-sampling. In BS 113 Last Haul-sampling was performed – 59 included highgrading sampling.

Information on the socio-economic impact of the landing obligation

23. Using the most appropriate indicators defined below, provide information on the socio-economics impacts on:

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

Answer:

No new studies or changes have been reported.

Please refer otherwise to the report produced by the *Copenhagen University in 2016 on the analysis of the long-term consequences of implementing landing obligation. The report (IFRO, 253, 2016) is attached, or can otherwise be accessed by the following link:*

http://curis.ku.dk/ws/files/168565897/IFRO_Report_253.pdf

Copenhagen University developed several socio-economic scenarios, as to how implementation of the landing obligation can affect the fishing industry, consumption and markets, as well as costs for Member states. A short summary for different scenarios from the IFRO report is stated below (IFRO Report, 253, 2016).

"Implementing the L.O. without quota-top ups (A-scenarios) will cause reduced revenues and profitability in the Danish fisheries. In that case, the fisherman has to replace target fish with previously discarded fish on the same quota. It will take fewer trips to fill the quota. Effort and therefore also variable costs are reduced. However, in the analysis it is assumed that non-target fish sell for a lower price than target fish for human consumption and thereby revenue is reduced.

If it is assumed that handling and sorting non-target fish carries an additional cost, revenue and profitability decrease further. However, if minimum sizes on cod and Norway lobster are reduced, part of the previously under-sized and therefore discarded catch can be sold at consumption prices increasing revenue and reducing the overall losses from the L.O. Additionally, another scenario without quota top-ups but higher quota utilization analyses the effects of increasing utilization in order for the fishermen to better exploit the opportunities in their quotas. This would reduce losses from the L.O.

The effect of this of course depends on the level of quota utilization in the starting point. In the absence of new minimum sizes or increased quota utilization, a technically imposed behavioural change reducing discard rates by 25 % alleviates losses.

If implementing the L.O. without quota top-ups but in combination with reduced minimum sizes or by fishermen increasing their quota utilization losses can be reduced considerably, some places by more than 50 %.

Increasing the quotas with the previously discarded amounts alleviates many of the potential losses and does under certain assumptions bring about economic gains for the fisheries. The latter especially refers to scenarios of reduced minimum sizes where previously discarded cod and Norway lobster can now be sold at consumption prices.

The areas most affected by the L.O. are the Baltic Sea and Kattegat/Skagerrak while the fisheries in the North Sea are less impacted. By vessel group, small and medium sized trawlers are the ones most affected by the L.O. Here, the decrease in revenue is on average 20 %, while the decrease in gross 20 %, while the decrease in gross margin is between 30 and 50 %. Trawlers overall are indeed the group most affected, experiencing revenue decreases of between 17 and 28 % and decreases in gross margin between 27 and 48 %. Because of high discard rates and highly valuable target catches for consumption, the fisheries for Norway lobster and cod in Kattegat as well as cod and plaice in the Baltic Sea and Skagerrak are affected the most by the L.O.”

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

Answer: No, no reported incidents.

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.

Answer: No, no reported incidents.

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.

Answer: No, no reported incidents.

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.

Answer: No amendments in the national legislation.

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.

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

Answer: No funding has been provided under Article 32 (Health and safety). Some projects funded under Article 38 and 42 will however have positive side-effects on working conditions e.g. sorting and storage of catches.

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 mcrs?

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?

Answer: In ports with fishmeal production plants present, BMS catches are often used for fishmeal production. In other ports, it is commonly used for animal food in the fur production. A large amount is, however, disposed as garbage. Quantities accounted for by sales notes can be quantified, which in most cases will be amounts sold for fishmeal.

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.

Answer: Data currently not available, but will be able to provide at a later point in time.

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.

Answer: 45 projects were funded in 2018 under article 38 of the EMFF for modifications on board vessels for the handling of catches on board. The total amount of investment was 4,724,579 euro € in total eligible expenditure (and 776,213 euro € in EMFF eligible expenditure). There is a wide span in the nature of the projects. Many projects entails investment in fishing gear that improves selectivity in size or species, while others invest in equipment to avoid and reduce unwanted catches or to handle these catches on board (sorting or storage systems).

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.

*Answer: 7 projects were funded in 2018 under **article 43** (fishing ports and landing sites) of the EMFF for investment concerning the landing obligation / unwanted catches. The total amount of investment was 4,372,585 euro € in total eligible expenditure (and 1,639,719 euro € in EMFF eligible expenditure). There is a wide span in the nature of the projects from energy optimization to storage systems to handle unwanted catches.*

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.

Answer:

3 projects were funded in 2018 under article 68 (marketing measures) of the EMFF for Investment concerning the landing obligation. The total amount of investment was 447,467 euro € in total eligible expenditure (and 182,284 euro € in EMFF eligible expenditure). The projects focused on better marketing potential and exploring new markets. No projects focus on implementation of the landing obligation.

8 projects were funded in 2018 under article 69 (processing of fishery and aquaculture products) of the EMFF for Investment concerning the landing obligation. The total amount of investment was 2,819,069 euro € in total eligible expenditure (and 604,498 euro € in EMFF eligible expenditure). The projects focus on investments in innovative processing projects. No projects focus on implementation of the landing obligation.

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
- Handling, storage and processing of unwanted catches
- Lack of funding to adapt fishing gears, vessels or port infrastructure

Answer and remarks received from the industry:

Re. Avoidance and/or selectivity insufficient to avoid unwanted catches

Many of the Danish vessels that have fished and are currently fishing with TR1, have a large part of their fishing in the Norwegian waters in the North Sea and Skagerrak, where landing obligations have been part of their everyday lives for many years. They use a significantly larger mesh size, for example 130 mm instead of the 120 mm allowable, and therefore do not have the great need to work with selectivity. These vessels also move between the Norwegian waters and the EU waters in order to get the right catch composition.

Selectivity is not considered to be a problem in the North Sea. However, cod, which is a very important species for the Danish fisheries and which occurs on virtually all the Danish fishing grounds, has been considerably cut in quotas for 2019, and will therefore become a choke species.

In Skagerrak and Kattegat TR2 in the Norway lobster fishery presents a challenge with inevitable by-catches of species such as whiting, ling, common skate and rays, since the quota for them is very small and nothing can be done to avoid the by-catch with increased selectivity. There is no expectation that the selectivity for whiting will be improved in the nearest future.

For the Baltic Sea, there is still a need for certain adaptations of the technical rules, so that there is a link to the landing obligation:

- Ideally, only a rule of minimum mesh width of 105 mm*
- Alternatively, permission to use the tools that have a tested (via scientific assessment) selectivity, which gives less catch of undersized cod.*
- As an absolute minimum requirement, abolition of the rules on the net in Bacoma*

Speaking of avoidance and selectivity, a major challenge is that the quota determination in recent years has been characterized by relatively large annual fluctuations in the fishing quotas for the main species. This lack of stability makes it extremely difficult to work long-term with avoidance and improving selectivity.

With "unwanted catches" we mean fish below the minimum size for species that are subject to landing obligation and which must not be sold for human consumption - "discard fish".

Re. Handling, storage and processing of unwanted catches

Given the species that have been subjected to landing obligations, there have been no major problems for Danish vessels to handle unwanted catches in the form of fish below the minimum size. In recent years several vessels have invested in the facilities aboard the vessels to handle the unwanted catches.

There is generally a challenge with some missing harbour facilities for handling of "discard fish"

– lack of a simple solution, a sales channel / handling model, so all fishermen have the same opportunity to get rid of their discard fish without the high costs.

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

Sufficient subsidy funds have been allocated to work on gear improvement, and we see this as a positive development in relation to the continued work on selectivity. There have also been opportunities for the Danish vessels to obtain subsidies for vessel improvements, so that they can work even better with the landing obligation. However, an ever-increasing focus on vessel grants with focus on some smaller vessels will mean that in the future there will be no financial aid to medium-sized fishing vessels, which now account for most of the catches in the Danish fishery. The previously mentioned problem with lack of port facilities, eg. in cooperation with Fish Oil and Meal Producers, may perhaps be handled with appropriate subsidy funds.

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

- Lack of understanding or awareness of the rules
- Difficulties implementing and monitoring de minimis or high survivability exemptions
- Implementation problems with regard to control/monitoring processes or infrastructure (e.g. adaptation of ERS systems)
- Refusal to carry observers

Answer: Denmark does not experience problems with lack of awareness of the rules by the fishermen, or difficulties implementing exemptions. The Danish Fisheries Agency supports any regional decision to implement further control tools in order to ensure compliance, as long as the implementation ensures a level playing field.

Difficulties in fully utilising fishing opportunities, such as:

- Problems re-allocating quota to cover catches previously not landed
- Problems with the timing or availability of quota swaps
- Fisheries being forced to close early due to choke problems

Answer: The Danish quotas are generally in line with the fishing opportunities needed. Cod in Kattegat is, however, due to high presence of the specie and low quota, a concern when implemented in the discard plan in 2019.

The Danish ITQ and pooling system in place solves in general most problems for the individual fisherman, with respect to ensuring adequate quota for a fishing trip, even for species previously not landed.