

**HELLENIC REPUBLIC
MINISTRY OF RURAL DEVELOPMENT
AND FOOD
DIRECTORATE-GENERAL FOR
SUSTAINABLE FISHERIES
DIRECTORATE FOR FISHERIES POLICY
AND FISHERY RESOURCES
Department 4**

**Athens, 1 February 2017
Ref. No: 6134/133954**

**TO: DG MARE
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A2
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Subject: 2016 annual report on the implementation of the landing obligation by vessels flying the Greek flag

RE: Ares (2016)6601248 - 24/11/2016

In view of the 2016 report on the implementation of the landing obligation by vessels flying the Greek flag, which is to be drafted by the European Commission in accordance with Regulation (EU) 2015/812, we hereby submit the following information:

Pursuant to Article 15 of Regulation (EU) No 1380/2013, in 2016 vessels flying the Greek flag would have a landing obligation with respect to the following species:

- (a) small pelagic species for which a minimum size is laid down in Annex III to Regulation (EC) No 1967/2006, specifically anchovy, sardine, mackerel and horse mackerel;
- (b) bluefin tuna, which is subject to a catch limit.

However, the European Commission has granted a derogation for the two above cases, for discarding a certain percentage of undersized catches out of the total number of catches. In particular:

1. 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.

According to the discard plan, by way of derogation from Article 15(1) of Regulation (EU) No 1380/2013, it is permitted to discard quantities of up to 3 % of the total annual catches of small pelagic 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 Crete.

2. Commission Delegated Regulation (EU) 2015/98 adopted a derogation from Article 15(2) of Regulation (EU) No 1380/2013 [sic: should read '2013'] as regards bluefin tuna. By way of this derogation, by-catches of up to 5 % of the number of pieces of the total catch by vessels targeting tuna, with a minimum size of between 8 kg or 75 cm and 30 kg or 115 cm, may be retained on board, transhipped, transferred, landed, transported, stored, sold, etc.

3. The Directorate-General for Sustainable Fisheries has issued relevant circulars informing the regional fisheries departments, the fisheries bodies and the competent audit authorities of the provisions of

TOTAL WEIGHT (kg)	223 654.74
TOTAL NUMBER OF INDIVIDUALS	3 984
WEIGHT (kg) OF NORMAL INDIVIDUALS (LARGER THAN THE MINIMUM)	219 372.59
NUMBER OF INDIVIDUALS	3819
PERCENTAGE OF TOTAL WEIGHT	98.085 %
WEIGHT OF UNDERSIZED INDIVIDUALS	4 282.21
NUMBER OF INDIVIDUALS	165
PERCENTAGE OF TOTAL WEIGHT	1.915 %

Regulation (EU) No 1380/2013 as regards the landing obligation and the existing derogations for 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>).

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 undersized quantities (and individuals, where required) of fishery products. As regards bluefin tuna (BFT) in particular, individuals are

CATCHES		kg	DISCARDS	PERCENTAGE (%)
ANCHOVY	ANE	12 701 518	300	0.0024
HORSE MACKEREL	JAX	529 663.9	1 037	0.1958
MACKEREL	MAC-MAS	1 241 779	62	0.005
SARDINE	PIL	10 984 181	1 468	0.134

recorded by their weight and length.

4. According to the available ERS data, in 2016 the quantities (live weight of landing) of normal and undersized individuals of bluefin tuna (BFT) are as follows:

The competent port authorities carry out inspections on all quantities of bluefin tuna (BFT) upon landing.

5. The quantities of undersized individuals of anchovy, sardine, mackerel and horse mackerel, be it landings or discards, which were recorded in the **integrated monitoring and recording system for fishing activities (OSPA)** were not sufficient to draw safe conclusions. Please find below the available data:

The **National Fisheries Data Collection Programme** (sampling from observers on board purse seiners) provided the following preliminary data:

Central and Southern Ionian Sea	
	Discards (%)
GSA-20	
<i>Engraulis encrasicolus</i>	0.1 %
<i>Sardina pilchardus</i>	1.5 %
	0.0 %
<i>Scomber colias</i>	
Aegean Sea	
GSA-22	
<i>Engraulis encrasicolus</i>	0.1 %
<i>Sardina pilchardus</i>	0.8 %
<i>Scomber colias</i>	0.0 %
<i>Scomber scombrus</i>	0.2 %
Combination of Aegean/Cretan Sea	
GSA-22.23	
<i>Engraulis encrasicolus</i>	0.1 %
<i>Sardina pilchardus</i>	0.8 %
<i>Scomber colias</i>	0.0 %
<i>Scomber scombrus</i>	0.2 %

A preliminary processing of the data by the National Fisheries Data Collection Programme showed that the discard rate for those species is <3%.

As the data for 2016 are currently being entered in the database of the National Fisheries Data Collection Programme, please note that there might be minor changes once the procedure has been completed. The rates at hand were calculated on the basis of the data which were thus far available in the database.

6. By applying the derogations, any socio-economic impact, and also any effect of the landing obligation on the safety of vessels flying the Greek flag, will be minimised.

Any undersized individuals of bluefin tuna (BFT), from 8 to 30 kg or from 75 to 115 cm, will be available for sale, provided that the requirements laid down in Regulation (EU) 1627/2016 [sic¹] are fulfilled.

7. As regards port infrastructure and the equipment on vessels, catches by purse seines will be landed in designated ports, as provided for in Article 22 of Regulation (EC) No 1967/2006, with the exception of quantities of small pelagics of up to 3 % which, by way of derogation, are allowed to be discarded. The same applies to bluefin tuna catches (Article 30 of Regulation (EU) 1627/2016) with the exception of those discarded. The designated ports comply with the requirements of Article 43 of Regulation (EC) No 1224/2009.

ANNEX: QUESTIONNAIRE

The Director-General

Internal distribution:

Directorate-General for Sustainable Fisheries

Directorate for Fisheries Policy and Fishery Resources / Departments

¹ Translator's note: the original says 'Regulation 1967/2016' but presumably should read '2016/1627'.

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.

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

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.

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

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

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.

Greece collaborated with Italy, in the framework of MEDAC according to the provisions of article 18 of Reg. (EC) 1380/2013, for the submission to the Commission by MEDAC of the Joint Recommendation for the region of Ionian Sea (GSA 20).

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

Production records from Data Collection Framework (National Program) and data from stakeholders.

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?

Production records monitoring from Data Collection Framework (National Program).

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.

**A. Data from ERS for the year 2016,
regarding BFT landings**

Total Weight (kg)	223 654.74
Total number of individuals	3 984
Weight (kg) of normal individuals	219 372.59
Number of individuals	3 819
Percentage on total weight	98.085 %
Weight (kg) of undersized individuals	4 282.21
Number of individuals	165
Percentage on total weight	1.915 %

B. For the year 2016 and for the species Engraulis encrasicolus, Sardina pilchardus, Scomber spp and Trachurus spp:

a) Data from S

Species		Quantities (kg)	Discards (Kg)	Percentage %
Engraulis encrasicolus	ANE	12 701 518	300	0.0024
Trachurus spp	JAX	529 663.9	1 037	0.1958
Scomber spp	MAC-MAS	1 241 779	62	0.005
Sardina pilchardus	PIL	10 984 181	1 468	0.134

b) Data from Data Collection Framework (DCF) Program

Central & South Ionian	
	% Discards
Engraulis encrasicolus	0.1 %
Sardina pilchardus	1.5 %
Scomber colias	0.0 %
Aegean GSA-22	
Engraulis encrasicolus	0.1 %
Sardina pilchardus	0.8 %
Scomber colias	0.0 %
Scomber scombrus	0.2 %
GSA-22&23 (combined)	
Engraulis encrasicolus	0.1 %
Sardina pilchardus	0.8 %
Scomber colias	0.0 %
Scomber scombrus	0.2 %

The preliminary data processing from both ERS and DCFR, showed that the discard rate for these species is <3%.

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

No data available.

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

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

Not Applicable

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

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.

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

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

Consultations with national association of shipowners (purse seines and bottom trawlers)

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.

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

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

Option to the user to register undersized catches on a separate column in ERS. Forming of separate lots

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

Applicable to the totality of the fishing fleet

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.

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 (see question 13)**

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.

Yes

Seminars and trainings organised for presenting the guidelines to inspectors at 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, i.e. REM, traditional systems (aerial surveillance, inspections at sea), reference fleets, etc. **Yes**
- Steps towards implementation of new tools, including electronic monitoring means dedicated to implementation of landing obligation, haul-by-haul recording, etc. **Yes**

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

Landings at designated ports (Regs 1967/2006, 1627/2016), inspections.

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

No information available

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 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

No information available

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

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

Disproportionate handling cost of unwanted catches. Difficult to transfer them from border and island regions, lack of adequate transport means, the ensuring of which will result in a disproportionate cost, compared to the benefit. Moreover, given the very small quantities of unwanted catches, whenever landed and the obligation to transfer the animal by - products with special vehicles (according to the law), we should construct special facilities and maintenance infrastructures at all landing points, which are numerous and scattered in Greece, to store unwanted catches up to the receipt by stakeholders for treatment and disposal, for purposes other than human consumption. This, apart from the basic interconnection problem and, thus, inability to collect them on a regular basis, increases the operating costs. For the collection and processing of the above data, a relevant market research preceded.

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

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.

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.

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.

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?

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?

Not applicable

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.

Greek authorities consider the possibility of funding for feasibility studies by the Operational Program “Fisheries and Sea” 2014-2020, concerning the exploitation of unwanted catches

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.

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.

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

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

Not applicable

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

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