

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~~

A study was carried out within the Pilot project for assessment of discards in Rapana Venosa fisheries with beam trawls in the Black Sea during 2017 and the project continued in 2018. The purpose of this project was to evaluate the impact of trawling activities on juvenile forms of turbot and piked dogfish.

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

The study applies to trawlers using beam trawls only.

3. What has the uptake of these measures and/or studies been in the fleet segments/fisheries to which they are applicable?

The studying estimates the effects of the beam trawls fishing to the bottom fish species, which appear as components of the incidental catch. The percentage ratio of the incidental catch of the turbot from the total rapana catch is 0.3192 % on average with a maximum of 4.44 %, when the data are averaged per trawls. During the study the fishing activities of 6 fishing vessels have been monitored.

During the summer period in 2018, the calculations of the shares from the total catch(rapana+bycatch) show that the average turbot bycatch is 0.39% (± 0.22 standard error), which varies between 0.08-1.03% per fishing day.

The total number of vessels authorized to use beam trawl for rapana is 65.

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

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

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~~

A Joint recommendation between Bulgaria and Romania was signed in 2016 and submitted to the Commission. With this recommendation we have claimed for exemption of the turbot based on high survival rates during turbot fisheries with bottom set gillnets. According to the scientific opinion, the discarded turbot individuals, caught with gillnets, have 90 % survivability, after their release back in the water. Based on this Joint recommendation a discard plan has been approved by Commission Delegated Regulation (EU) 2017/87 of 20 October 2016 establishing a discard plan for turbot fisheries in the Black Sea.

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

In support of this request we have asked the scientific institutes in Bulgaria and Romania to provide their opinion on this subject. Both institutes (Institute for Fish Resources in Varna and the National Institute for Marine Research and Development "Grigore Antipa" in Constanta) have submitted their written statements on the high survivability of turbot, which was used as a base in our Joint recommendation.

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?

Not applicable for Bulgaria.

9. What has been the utilization of any granted de minimis exemptions in the fleet segment/fishery to which the exemption applies?

Not applicable for Bulgaria.

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

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

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

At the time of the preparation of the BG-RO Joint Recommendation the Black Sea Advisory Council was not fully operational. Nevertheless the opinion of the sector has been asked.

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

The campaign for raise of the awareness of the sector has started before the adoption of the discard plan, through adopted in 2015 Communication plan for the implementation and enforcement of landing obligation. This plan has as its primary objective to raise the awareness of stakeholders engaged in a fishing activities, first sale, trade and transport of fish, regarding their obligation. The plan is published on the website of the Executive Agency for Fisheries and Aquaculture. After adoption of the delegated act, a number of meetings have been organized in order to explain fishermen the new rules and to ensure the proper understanding of the provisions Furthermore we have requested the masters to sign a declaration that they are aware of 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

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

Not applicable.

16. What has the uptake been of these measures in the fleet segments/fisheries to which they are applicable?

Not applicable.

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

This information has been provided to the fishermen by the Communication plan for the implementation and enforcement of landing obligation. In addition several meetings have been organized in order to raise the awareness of the sector.

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 organized for presenting the guidelines to inspectors at national and regional level.

A seminars and trainings have been organized for presenting the guidelines to the inspectors at national and regional level. During November and December 2018 two seminars were organized by EAFA with a topic “Specialized training of the inspectors to improve the effectiveness of controls and inspections by applying a good practice”.

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.

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;

We don't have reports/records.

- 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.

Guidelines for inspection and control were adopted in 2013. According to the instruction in the Guidelines, the inspectors shall monitor the catches and landings and ensure that all fish landed is in line with the MCRS. In the implementation of our training programme, the inspectors are trained to control and monitor the size of the fish. Such a field exists in forms of all inspection reports, so it is ensured the proper implementation of this provision. In addition, measures were taken to monitor landings at the ports, the fish markets/auctions as well as inspection benchmarks are included in the National fisheries control plan for 2019.

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.

All control and monitoring activities are based on risk assessment methodology as part of the National fisheries control plan for 2019. For third consecutive year we applied common approach for regional risk assessment applicable for Black Sea. The risk assessment methodology used is the same as applied by the EFCA to other regions. For the purpose of the risk assessment the fleet was divided to 5 main groups based on their activities and targeted species and after evaluation of impact and likelihood, a risk category was assigned to each segment.

At national level we applied other methodology for risk assessment in order to create priorities and inspection benchmarks in the ports and landing places. In this methodology we used data from previous landings, infringements, number of vessels, species etc., to determine the risk of each port.

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

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.

Since we did not detect any case of undersized fish landed, we are not able to provide information about the socio-economic impact of the landing obligation. Based on our expectations, the most serious impact will be on the catching sector since there are not suitable conditions to store,

process and/or destroy the undersized fish. In addition it should be mentioned also the lack of state aid for the catching sector for this matter. As regards the processing sector, the impact will affect the quantities used for raw material, but it won't be so serious.

Information on the socioeconomic impact of the landing obligation

24. Have there been any reported incidents of overloading of vessels causing stability problems? ~~Yes~~/No

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

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

27. Has any national legislation relating to safety on board fishing vessels arising from the landing obligation been amended or introduced? ~~Yes~~/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.

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 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?

We don't have reported/registered cases for landing undersize fish, respecting landing obligations.

30. Have you carried out any studies or pilot projects considering the potential uses for such catches? ~~Yes~~/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.

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; - *We don't have facilities for handling, storage and processing of unwanted catches.*
- 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 utilizing 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.

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

35. How is the effective control and enforcement of the landing obligation at sea and the accurate documentation of all catches, including quantities discarded, ensured?

The accurate documentation of all catches, including quantities discard is recorded in the fishing logbook.

36. How many suspected and confirmed infringements, related to the landing obligation, have been detected at sea and at landing/marketing?

We don't have any infringements detected, related to the landing obligation

In cases of confirmed infringements please indicate the circumstances of the offence and the sanctions applied, including penalty points.