



**Scientific, Technical and Economic
Committee for Fisheries (STECF)**

**Report of the Sub-group on Research
Needs (SGECA/SGRN 09-01) - Evaluation
of Data Collection Programmes of Member
states for 2009 and 2010**

9-13 FEBRUARY 2009, BILBAO

Edited by Paul Connolly & Tiit Raid

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COMMISSION STAFF WORKING DOCUMENT

EVALUATION OF DATA COLLECTION PROGRAMMES OF MEMBER STATES FOR 2009 AND 2010

REPORT OF THE SUB-GROUP ON RESEARCH NEEDS (SGECA/RSN-09-01)

STECF OPINION EXPRESSED DURING THE PLENARY MEETING (PLEN-09-01)

20-24 APRIL 2009, Galway

1. INTRODUCTION

STECF is requested to review the report of the **SGRN/ECA-09-01 Working Group** of February 9 - 13, 2009 (Bilbao) meeting, evaluate the findings and make any appropriate comments and recommendations.

Background

The Council regulation EC N°199/2008 established a new Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the CFP. Under this council regulation, Member states must produce national programs for data collection for the 2009-2010 period, in conformity with the modules and the methods defined in the Commission decision 2008/949/EC.

2. TERMS OF REFERENCE

1. Objectives of SGRN to contribute to the implementation of the DCF.
2. New challenges and opportunities offered by the new DCF.
3. Regional dimension of the DCF: Lessons learnt and Issues identified from the first RCMs.
4. Evaluation of the National Programmes for 2009-10 in relation to Article 6 of Council Regulation (EC) 199/2008. This evaluation will be based on the overarching criteria of conformity and scientific relevance. The NP will be evaluated at a regional scale on a chapter by chapter basis.
5. The role of data end users (namely ICES and GFCM) in the new DCF. Particular attention will be paid to the provision of feedback on data availability, quality, gaps and the data used in the scientific advisory process.

6. AOB.

3. STECF COMMENTS AND RECOMMENDATIONS

The SGRN/SGECA 09-01 report mainly addresses the ToR 4 on the “Evaluation on the NPs for 2009-2010”. Compared to the previous DCR, the new DCF includes additional parameters to be collected under new modules (aquaculture, ecosystem effects of fishing) or existing modules (transversal variables under the module of evaluation of the fishing sector). STECF notes the challenge encountered by SGRN/SGECA 09-01 in the review of 22 NP in 4 days, without prior screening and without guidelines and procedures. However, STECF notes that there is no clear evidence that the expertise of the experts present at the meeting covers all these modules.

SGRN/SGECA 09-01 conducts the evaluation of MS NPs within regional subgroups on the basis of a standardized evaluation procedure, developed during the meeting. These regional evaluations took the largest amount of time at the meeting. STECF notes that some MS NP proposals were evaluated within different regional subgroups as some MSs are involved in several fishing regions. However, it remains unclear how these different subgroup analyses are merged in the report. Moreover, STECF is concerned that no analysis of the subgroup reports was carried out in the SGRN WG plenary and notes that in some cases, this could have lead to inconsistencies and differences in the evaluation by the regional subgroups. STECF notes that the SGRN/SGECA 09-01 report does not provide suggestions for remedying the obvious lack of time for detailed, consistent and plenum-agreed evaluation of NP proposals. Expanding the meeting time by 1-2 days could be an option, but a separate ‘pre-evaluation meeting’ should be preferable. STECF appreciates the effort of the subgroup to report on general comments in addition to comments by national programme.

Considering that the DCF is in a period of major transition from the old DCR to the new DCF and the tremendous amount of work that has been done by Member States in compiling their NP (2009-2010) under the new DCF, STECF supports the flexible approach of SGRN in the evaluation.

STECF recognizes that the meeting duration was too short to address all the ToRs in detail. In particular:

- it seems that the report does not address the ToR 1
- regarding the lessons learnt and issues identified from the first RCMs (ToR 3), the group raised the issue of the availability of the RCM reports very late in 2008, and not in time to help Member States prepare their National Programmes (NPs). This implies different understanding of the Commission decision 2008/949/EC by different MS and these misunderstandings made the evaluation process more complex and time consuming.
- regarding the role of the data end users in the new DCF (ToR 5), the SGRN/SGECA 09-01 group encourages the GFCM to develop feed-back systems similar to ICES.

STECF supports the SGRN initiative to promote data-end-user feedback. These data-end-users are much wider than ICES and GFCM and also include *inter alia* ICCAT, IOTC, SEFOS, Discard meetings and various STECF working groups.

In order to encourage and strengthen data end user feedback, STECF suggests:

- to establish a data base inventory of all data collected, to cross check with data used in assessments
- to establish a series of case studies to address the availability of data collected under the DCF as well as its relevance to end-users. An in depth analysis of the flow of data from collection under the National Programmes to their use in assessments may be useful to identify bottlenecks and reasons for data not being delivered. Such an analysis would form a good basis for identification of actions to be taken to improve the availability of data to end-users.

STECF noted that data collected under the DCF are used not only for advisory work as specified in the DCF but also for management. An example is the rule on annual adjustment in the maximum allowable fishing effort laid down in the cod recover plan (COUNCIL REGULATION (EC) No 1342/2008 of 18 December 2008 establishing a long-term plan for cod stocks). According to the rule the adjustment in effort shall be based on the catches of cod collected under the DCF. This end-use of data is not addressed in the DCF and has not been taken into account in the work of SGRN. The STECF notes that it is important that the new end-use of DCF data is taken into account in the STECF-SGRN review of NPs.

Finally, STECF endorses the recommendations of SGRN/SGECA 09-01:

- to review the guidelines for the submission of NP proposals 2011-2013 during the SGRN/SGECA 09-02 June 2009 meeting. The general comments within the SGRN/SGECA 09-01 report and the reports of the 2008 RCMs (Anon. 2008 a,b,c,d.) appear as a useful preparatory work for this task.
- to develop working procedures for the review of NP proposals during the SGRN/SGECA 09-02 June 2009 meeting. In particular, a clear, standardized and applicable methodology for the evaluation of the NP proposals by modules and by regional subgroups should be developed and the expertise covering all the modules of the new DCF should be ensured. STECF supports the idea of an initial screening of the NP by a group of experts familiar with the DCF, who could work by correspondence. This report would then be used by SGRN as a starting point for the National Programme reviews.
- to review the list of research surveys that are funded under the DCF. This review should be carried out in January 2010, before Member States submit their 2011 to 2013 National Programmes in March 2010.

References:

- Anon. 2008a. Report of the Regional Co-ordination Meeting for the North Sea and Eastern Arctic (RCM NS&EA) 2008, 83 pp.
- Anon. 2008b. Report of the Regional Co-ordination Meeting for the Baltic Sea (RCM Baltic) 2008, 78 pp.
- Anon. 2008c. Report of the 1st Regional Co-ordination Meeting for the North Atlantic (RCM NA) 2008, 144 pp.
- Anon. 2008d. Report of the 1st Regional Co-ordination Meeting for the Mediterranean and Black Sea (RCM Med & BS) 2008, 79 pp.

4. ANNEX I SGECA/SGRN-09-01: EVALUATION OF DATA COLLECTION PROGRAMMES OF MEMBER STATES FOR 2009 AND 2010

Bilbao, 9-13 February 2009

This report is the opinion of the Sub-group on Research Needs (SGECA/SGRN-09-01) and not of the Scientific, Technical and Economic Committee for Fisheries (STECF)

This report does not necessarily reflect the view of the European Commission and in no way anticipates the Commission's future policy in this area

5. INTRODUCTION

5.1. The new Data Collection Framework

The European Council published a Council Regulation concerning the establishment of a Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy (Council Regulation (EC) No 199/2008). This new framework has been established taking into consideration the most recent developments in fisheries management such as the fleet-based approach and the ecosystem approach and taking advantage of the experience gained during the implementation of the old data collection regulation (Council Regulation (EC) 1543/2000) which is in place since 2001. It also provides support for scientific advice.

The major elements of the new Data Collection Framework (Council Reg. 199/2008, Commission Regulation 665/2008, Commission Decision 2008/949/EC), establish one Community Programme, instead of a Minimum and Extended Programme, and the programmes are drawn multi-annually instead of annually (Council Reg. 199/2008; Article 3). Data quality aspects and an improved data access are clearly emphasised. Member States have new obligations regarding data quality control and validation. They will have to describe the sampling strategies they have used to collect the data, the statistical estimates used and the relationship between cost and precision (Commission Regulation 199/2008, Article 1). The regional approach for data collection is implemented by defining the geographic regions (Baltic Sea, North Sea & East Arctic etc.; Article 1), and correspondingly, the scope of Regional Co-ordination Meetings (RCMs; Article 4). In the case of delays in submission of the NP Proposals or annual reports, the Community financial assistance could be reduced (Article 6).

The new Commission Decision (2008/949/EC) is divided into:

- (1) Module of evaluation of the fishing sector:
 - (a) Section for the collection of economic variables
 - (b) Section for the collection of biological variables
 - (c) Section for the collection of transversal variables
 - (d) Section for research surveys at sea

Module of evaluation of the economic situation of the aquaculture and processing industry sectors:

- (a) Collection of economic data for the aquaculture sector
 - (b) Collection of economic data for the processing industry
- (2) Module of evaluation of the effects of the fishing sector on the marine ecosystem
- (3) Module for management and use of the data covered by the data collection framework
- (4)

Section (2)(a) on Aquaculture economics, Module (3) on the ecosystem effects of fishing and Module (4) on the management and use of data are new elements to the data collection regulation. Economic and biological aspects are summarised into two sections, and fisheries statistics aspects are summarised into a section on transversal variables.

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5.3. Terms of Reference

1. Review the objectives of SGRN to contribute to the implementation of the new DCF
2. Examine the new challenges and opportunities offered by the new DCF.
3. Regional dimension of the DCF: Examine the lessons learnt and issues identified from the first RCMs
4. Evaluate the National Programmes for 2009-10 in relation to Article 6 of Council Regulation (EC) 199/2008. This evaluation will be based on the overarching criteria of conformity and scientific relevance. The NP will be evaluated at a regional scale on a chapter by chapter basis.
5. Examine the role of data end users (namely ICES and GFCM) in the new DCF. Particular attention will be paid to the provision of feedback on data availability, quality, gaps and the data used in the scientific advisory process.

5.4. STRUCTURE OF REPORT

SGRN's report on the evaluation of Member States National Programmes for 2009 and 2010 is composed of 3 main parts:

- A Section (Section 2) dealing with general comments that apply to all or to particular Modules of the DCF.
- A section (Section 3) with SGRN's comments on each MS National Programme, with emphasis on derogations and non conformities. This section deals with individual MS alphabetically and each NP is examined module by module.
- Other Sections addressing the Terms of Reference

5.5. EVALUATION PROCESS

There were a number of issues with this years SGRN evaluation process that impacted on the efficiency and effectiveness of the review of the National Programmes.

- (1) REVIEWING PROCEDURES - The fact that there were no reviewing procedures available for the national programmes under the new DCF meant that that had to be developed and agreed during this meeting. This used up valuable time.
- (2) MEETING DURATION - While all the programmes were reviewed in regional Sub Groups, there was simply not enough time to discuss and agree these reviews in plenary sessions. Four Working days is too short for the review process.
- (3) PRELIMINARY SCREENING – There was no preliminary screening of the NP and SGRN had to review all the material from scratch.
- (4) NEW DCF – The NP were written under the new DCF. MS has to deal with a completely new data collection framework and there were many inconsistencies associated with interpretation of the new guidelines which made the evaluation process difficult.
- (5) MEMBER STATES – The increased number of MS make it more difficult to perform a complete analysis using the current model which was developed when there were far less MS.

These important issues must be addressed for future SGRN reviews if the reviews of NPs are to develop into an efficient and effective review process. Proposed solutions to these issues will be given in the report.

A review of the SGRN (2007) evaluation of NPs indicates that many of the issues identified with the old DCR reviews persist with the new DCF reviews.

In previous years, external evaluators examined the NPs and provided SGRN with a preliminary report. SGRN then responded to the external evaluators comments on National Programme (NP) proposals. In 2007, the external evaluation process ceased and SGRN reviewed the NP themselves. SGRN (2007) has commented that it was not sorry to lose the old review procedure. The group welcomed the external view but the obligation to only comment on the external evaluators questioning was seen as a restriction to the potential of the group. SGRN (2007) also stated that it will need to review the new procedure in order to improve the accuracy and efficiency of the analysis.

SGRN (2007) commented that it will need some time to adjust its analysis and will endeavour to improve its efficiency and accuracy. SGRN (2007) stated that (i) it will need to take into account the history of each MS with regards to the past achievements and non conformities, and (ii) it will need one more day for the meeting. This year the SGRN meeting lasted 4 working days and there was insufficient time for a complete and thorough review. (This will be commented on later).

The increasing number of MS makes it more and more difficult to perform a complete analysis. A one hour discussion in plenary for each MS will represent 22 hours (i.e. 3 full days). SGRN (2007) commented that during its meeting, exactly half of this time was available for plenary discussion, thus resulting in a lot of frustration by not being able to examine each NP in depth. This problem has persisted in the SGRN 2009 meeting to review the 2009-2010 NPs.

SGRN (2007) stated that it is likely that in the new DCR, the submission of the NP proposals will occur later during the year, therefore making it difficult to be externally evaluated. In order to facilitate the evaluations, the group had to devise a procedure to evaluate the NP proposals and have chosen to use a template close to the one used for the analysis of the Technical Reports. By doing so, SGRN wishes to fully evaluate module by module the planned proposal by each country and rely on the expertise developed for the analysis of the technical reports.

SGRN (2007) stated that consistency of analysis between countries is important to SGRN, but this has not been fully done here due to lack of time. Hence, it may result that a similar non-conformity may have been picked up in one country and not seen in another. SGRN (2007) commented that an extra day and better preparation for the meeting will improve significantly the efficiency and accuracy of SGRN analysis.

5.6. PROCEDURES TO EVALUATE NATIONAL PROGRAMMES

First of all, data on the level of investment is required. Some MS report insurance value of the vessel as a measure of invested capital, others report the replacement or historical value. It is often assumed that this figure reflects the total capital invested in the vessel business. Intangible investments such as fishing rights should also be included in the calculation, when applicable. Large differences in the amount of capital invested are likely to exist between MS, in particular between those MS who have tradable markets in quota and licences and those who do not. A recent EU wide study¹ focussed on defining a common methodology for the calculation of capital invested in tangible assets and capital costs (Perpetual Inventory Method (PIM)), and it is recommended that this methodology is followed by MS when producing ROI estimates.

Net profit is also required to calculate ROI, and net profit is calculated by subtracting variable, fixed and capital costs from income. Consequently, data on these variables are also needed for the ROI calculation, all of which are/will be collected as parameters in the current and revised DCR.

The Opportunity cost of capital also needs to be incorporated into the ROI calculation. The current DCR provides only a 'Capital Costs' parameter, and while this should include the opportunity cost of capital and depreciation, there again exists differences between MS i.e. some MS report 'depreciation and interest' instead of depreciation and opportunity costs. This may be because of the lack of explanation given in the current DCR. The WG believes that this issue has been rectified under the reform DCR, so it should not be a problem for MS to perform the calculations once the reform DCR is in place. One potential issue involves double counting the opportunity cost when calculating capital costs. The opportunity cost should be the difference between the alternative possible rate of return (e.g. investment in government bonds) and the current rate of return from the fishing operation.

Reference points are needed in order to interpret the indicator effectively. For instance the *theoretical risk free rate*² could be used as a target reference point (TRP). When ROI is lower than the TRP, investment elsewhere is more profitable and it would be inefficient to invest in that particular fleet segment. In a risky business such as fisheries, one would expect ROI to be higher than risk free rates. Risk free rates (government bonds) are now used to estimate

¹ Evaluation of the capital value, investments and capital costs in the fishery sector No FISH/2005/03

² The "*theoretical risk free rate*", for instance the long-term Treasury bond rate, has been suggested as an applicable reference point [SGECA-SGRST report on subgroup meeting on bio-economic modelling, 2006]. On the face of it, the suggestion seems reasonable but other reference points may be equally appropriate. Other sectors may prove considerably more profitable than an investment in a fishery, which inevitably increases an applied reference point. Furthermore, the fluctuations and inherent dynamics of fish stocks may increase uncertainty and consequently the applied reference point for ROI. From a socio-economic point of view, a sensible reference may be lower than the long-term Treasury bond rate- even lower than zero. This is the case when considerable positive externalities from the fishery are present (for instance positive effects on public health, amenity values etc.). In summary, the theoretical risk free rate provides a sound general reference point whereas the target reference points are case-specific. The WG recommends that if it is being left to MS to define specific target reference points, the MS needs to justify that reference point over alternatives.

opportunity costs. Therefore, stating that the ROI must be higher than the risk free rate is the same as stating that net profit should be larger than zero.

The main weakness of ROI as a 'balance' indicator are that a reasonable reference point for 'balance' is needed; and additionally the sustainability of the resource is not indicated via ROI, as it is purely an economic indicator. One would expect ROI in fisheries to be higher than risk free rates but if there are considerable positive externalities from fisheries e.g. benefits to public health, politicians and fisheries managers may accept lower or even negative returns.

ROI is a long-term economic indicator and consequently the applied time series must correspond to the long-term economic considerations of vessel owners in the fleet segment. As a result, the recommended minimum time series should be five years and preferably more, reflecting the investment outlook of the fishermen.

5.7. PRESENTATION OF THE EVALUATIONS

In its evaluation of the NP proposals, SGRN has addressed several issues, related to the reports in general, their structure and presentation and for each Module, the focus was on derogations and non conformities. For each MS, SGRN's assessment of the achievements is summarised in two sections. Section A provides a table with overall "ratings" and comments on the NP as a whole. Section B focuses on derogations and non conformities with module-specific comments.

5.8. A NOTE ON DEROGATIONS AND NON CONFORMITIES

The DCF has several formal provisions for derogation, where metiers can be excluded from sampling for length (based on a ranking system) or where stocks can be exempted from the obligation to collect samples for age and 'other biological parameters', if a MS's landings are below certain thresholds. Whenever these exemption rules are applied, it should clearly be stated and documented in the relevant sections of the NP Proposal and under 'List of derogations'.

There may however, be other reasons for a MS to ask for a derogation or to justify a non-conformity between its planned data collection activities and the requirements of the DCR. All such requests should be fully documented and explained in the relevant sections of the NP Proposal. Derogations and non-conformities that are most likely to be accepted by SGRN and endorsed by STECF are those which are in accord with:

- A formal recommendation by an external expert group (e.g. ICES and other acknowledged planning groups on fishery-independent surveys, market and discard sampling, etc.).
- A formal recommendation by a Regional Co-ordination Meeting (RCM).

- A bilateral agreement between MS on task sharing in relation to certain aspects of the DCR (e.g. sampling of foreign flag vessels, joint sampling programmes for age-length-keys or 'other biological parameters', etc.).
- A former, unconditional approval of a similar request for derogation, or a non conformity, by SGRN, STECF or the Commission.

Should this be the case, then a verbatim transcript of the supporting recommendation / section of the agreement / approval should be included in the NP Proposal (preferably in quotes "... and in italic), together with a reference to the document where the relevant background information can be found. As an alternative, bilateral agreements may also just be referred to in the text and included as an annex to the NP Proposal.

TABLE 1 the allocation of NP to the various Sub Groups

	Member State	Baltic Sea	North Sea & East Arctic	North Atlantic	Mediterranean & Black Sea	Other regions
1	Belgium		X	X		
2	Bulgaria				X	X
3	Cyprus				X	X
4	Denmark	X	X			
5	Estonia	X		X		
6	Finland	X				
7	France		X	X	X	X
8	Germany	X	X	X		
9	Greece				X	X
10	Ireland			X		X
11	Italy				X	X
12	Latvia	X		X		X
13	Lithuania	X				
14	Malta				X	X
15	Netherlands		X	X		X
16	Poland	X		X		
17	Portugal			X		X
18	Romania				X	X
19	Slovenia				X	
20	Spain			X	X	X
21	Sweden	X	X			
22	United Kingdom		X	X		

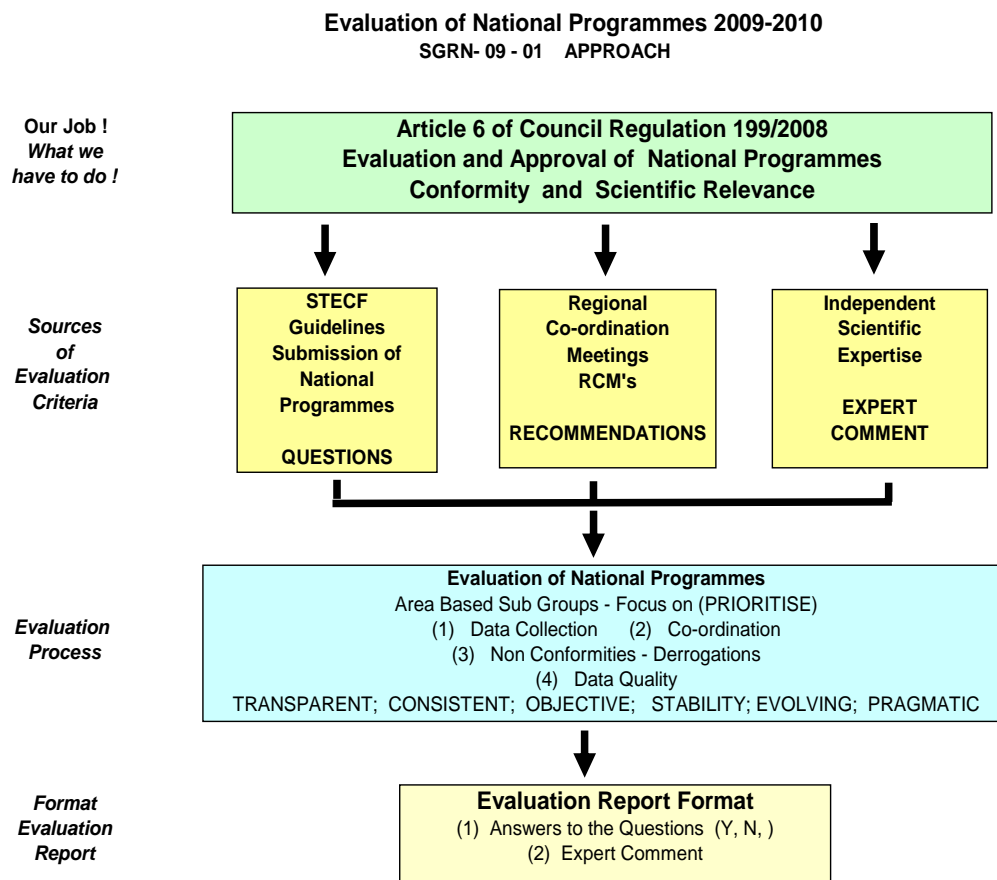


FIGURE 1 – Guidelines for Review of NP – The model developed during the meeting and used to evaluate MS National Programmes

6. GENERAL COMMENTS ON THE NATIONAL PROGRAMMES

6.1. APPRECIATION

SGRN would like to acknowledge the tremendous amount of work done by the Member States in compiling their National Programmes under the new DCF. SGRN emphasise that we are in a period of major transition from the old DCR to the new DCF.

6.2. ON FACILITIES AND TRANSLATION OF NP

SGRN was pleased with the facilities offered by the AZTI, with the exception of the shared network which was not capable of meeting the demands of the attendees. This is not the first time that this has happened and SGRN expect in future that a network capable of servicing 25 people will be put in place in order to facilitate the smooth running of these meetings. SGRN appreciates having all reports given or translated into English. All reports could then equally be read and analysed by all experts attending the meeting.

6.3. ON RANKING SYSTEM, MERGING PROCEDURES AND SAMPLE OPTIMISATION

According to DCF, merging of metiers should be supported by statistical evidence. However, MS's did not supply any documentation to justify merging of different metiers. SGRN consider that clear guidelines on statistical analysis for merging are needed. Metiers can be merged when they have similar and statically proven exploitation patterns and the merging is supported by documentation. SGRN endorses the RCM NS&EA 2008 view that *all MS have proposed their own mergers based on implementation constraints (availability of fisheries statistics, reduction of strata size etc.) or on a scientific a priori grouping (e.g. gear type OTB and PTB, OTM and PTM etc.). The RCM NA&EA is of the opinion that this way of merging métiers is acceptable given the obligation to have a pragmatic start of the new sampling programmes. The scientific evidence for métier mergers required by the new DCF needs to be evaluated once the first datasets are available, (i.e. from 2010 onwards). The ICES PGCCDBS could be helpful in discussing the appropriate ways of carrying out these scientific analyses.*

6.4. ON THE COST PROJECT

Several MS referred to the COST project results due in 2009, before starting the statistical analysis procedures for sample optimization. SGRN consider this as a feasible strategy to ensure standardization across MS. The COST project will finish in May 2009 and will then be reviewed. SGRN advise MS that there are many basic methods available to conduct sample optimization and encourage MS to use these.

6.5. ON REPORTS FROM RCM's

Several RCM reports were available only one week before SGRN meeting and therefore most MS were not able to account for RCM recommendations in their NP. The RCM's have noted that merging of metiers has been conducted using different criteria among MS.

6.6. ON METIER SAMPLING – MINIMUM REQUIREMENTS

According to the DCF, at least 12 trips per metier per year should be carried out for landings and 8 for discard. For several MSs, the planned number of trips is lower than indicated above. However, SGRN notes that some fisheries are only seasonal and therefore the minimum requirement is likely to be less than 12 trips per year. Even if it is less than 12 trips, the MS have to allocate their sampling in proportion to the seasonality of fishery. SGRN is not able to assess whether minimum requirements are respected as the length of the fishing season and fishing trip are not reported as they are not requested by the guidelines. SGRN propose that a column indicating the length of the fishing season and average fishing trip is included in the NP (Table IIIC.3).

6.7. ON DEROGATIONS FOR DISCARDS AND LANDING SAMPLING

According to DCF, all metiers selected by the ranking system should be sampled for landings and discard. There are provisions in DCF to reduce the sampling burden (e.g. merging; international co-operation). SGRN recognize that it will take time for MSs to adjust to the new DCF. SGRN would point out that derogations can be granted if reaching for target precision level implies excessive costs or if they are fully documented and scientifically proven. No such documentation has been provided by MSs. SGRN consider that derogations can only be granted if the level of discard is statistically proven and supported by documentation.

6.8. ON NON SELECTED METIERS

There is no documentation or explanation about the level of discard for all metiers that are not selected by ranking to allow SGRN for evaluating derogations for discard sampling of those metiers. According to the Commission staff working paper on discards from community vessels (SGRN, November 2006), demersal trawls, seine and set nets are indicating level of discards for both cod and herring that are large than 10%. Long-lines and pelagic trawls and seine have instead level of discards less than 10% for cod. However, this classification has been done by gears and not by metiers as requested by the DCF. Although SGRN consider that this document is not applicable to the new DCF, it gives indications on the métiers using

gears known as generating substantial levels of discarding that would need to be monitored. Such métiers should then be monitored regardless of their status in the ranking system. In general, all métiers operated by member states should be browsed as regards discarding behavior, derogations demanded, and if low levels of discards is statistically proven and/or supported by documentation. A first approval of low discarding métiers could be done at a regional level during the RCM's.

6.9. ON USE OF SURVEY LENGTH AND AGE DATA

SGRN notes that some MS are using both surveys and landings sources for sampling age composition. SGRN interpretation of the DCF (Section B2-3.1) is that length composition or age composition from surveys cannot be applied to derive length and age composition of landings. SGRN recognize that the DCF does not forbid the use of age reading (i.e. age at length information) from surveys to support/complement age reading from landings for the construction of age length keys.

6.10. ON ECOSYSTEM INDICATORS

The suitability of surveys for collecting environmental indicator 4 (on maturities) is commonly referred to in NPs, but no details are generally given as to the precise species for which these surveys are appropriate. SGRN suggest that guidance should be developed, survey by survey, to indicate for which species and in which areas it is appropriate to gather maturity data. SGRN will refer the matter to the RCMs.

For environmental indicators 1-4, Annex XIII refers solely to fishery-independent surveys for data collection. However Table IIIC3, which is métier-based, indicates that fishery-dependent sources are also appropriate. SGRN considers this contradictory. SGRN recommends that this be resolved in the proposed review of the Guidelines for submission of MS National Programmes.

6.11. ON REVIEW OF SURVEY

The issue of how do we deal with surveys in which not all relevant Member States take part was discussed (e.g. For ASH & BW, all relevant states must contribute, subject to derogation). SGRN notes that this approach is not enacted for other surveys. SGRN also considered the wider issue of survey utility and prioritization. SGRN recommends that a review of eligible surveys should take place before the next set of NP is submitted by MS in March 2010 for the years 2011 to 2013. Therefore, this review should take place in early 2010 and should include feedback from the data end users. TOR's should be developed by STECF as soon as possible. The TOR's from the last review of surveys are given below.

STECF/SGRN 07/01 were asked to address three terms of reference

- a) Develop operational prioritization criteria relating to an international dimension, importance of stocks, long term utility for fisheries management and cost efficiency in order to set up a list of surveys at sea to be supported by the new DCR with their priorities;
- b) Compile information on specific ongoing surveys including the updated information with regards to the surveys at sea provided by the Regional Coordination Meetings, the outcomes from the EVARES project, the ICES data quality exercise on demersal surveys, the ICES data quality exercise on demersal surveys;
- c) On the basis of the operational criteria and the information compiled propose a list of surveys by Region (Baltic Sea, North Sea, Northeast Atlantic, Mediterranean waters, Long Distant Fisheries (including the Northwest Atlantic)) with different level of priorities. Periodicity (annual, multi-annual) of the surveys will have to be taken into account and for each survey, objectives and the types of information collected will have to be specified.

6.12. ON METIER MATRIX

Regarding the ranking system, SGRN considers that MS did not interpret the rules in a consistent way leading to inconsistencies in métier selection. The strict application of the criteria may lead to too many métiers. The general feeling is that the number of métiers becomes too large and too unwieldy as a primary result of the ranking system. Interpreting the provisions of the DCF, some MSs have tried to reduce the number in a sensible and pragmatic way. The relatively fine resolution of the matrices may lead to deterioration in sample coverage (in terms of quality) for important metiers where sampling has to be spread over numerous (often small) metiers. SGRN recognizes that the interpretation of the métier rules should be given time “to bed in “. SGRN recognize that a cost efficient system is likely to require the use of alternative sampling methods and will refer the matter for discussion at the RCM's.

6.13. ON TRANSVERSAL VARIABLES

Because transversal variables cover supra-regions, the review process as practiced this week (regional Sub Groups) leads to duplication of effort. SGRN will bear this in mind when developing the new guidelines for review of NP's

6.14. ON MEETINGS TO BE ATTENDED

Because the official list of approved meetings did not appear until mid-December, many of the proposals try to anticipate which meetings might be eligible for co-financing while other MS do not. This has made it very difficult to review the NP and the review itself may be inaccurate. SGRN recommends that Member States should be asked to review their programmes for 2009 in light of this. SGRN would ask the Commission to identify meetings for 2010 as soon as possible.

6.15. ON INTERNATIONAL CO-ORDINATION

Reviewers of the NP neither found that while MS listed their bi-lateral agreements in the annexes, they did not refer to them in the report text (Section III B). SGRN recommends MS to address this in future NP submissions.

6.16. ON SPECIES DEROGATIONS AND NON CONFORMITIES

Species derogations can be granted on the basis of less than 200 tons in total landing, if there is not any different provision from relevant RFMO. However, when official references such as EUROSTAT reveal inconsistencies, the derogation cannot be evaluated on the basis of the EU total landing. MS should provide these data so the derogation can be evaluated. SGRN suggests MS to provide a cost/benefit analysis in detail to determine the excessive cost as mentioned in the NP.

6.17. ON PRECISION

Most MS presented a sampling programme in line with the new DCF, in particular regarding fleet-fishery based sampling (metier stratification and concurrent sampling). SGRN acknowledged that it is currently impossible to have a clear perspective of the precision that will be achieved. SGRN recognise that sampling intensity will have to be adjusted based on MSs experience with the new DCF.

6.18. ON THE ESTIMATION OF CAPITAL VALUE AND CAPITAL COSTS

SGRN would point out that the capital value and capital costs should be estimated according to the PIM methodology proposed in the capital valuation report of study No FISH/2005/03 (2006. Evaluation of the capital value, investments and capital costs in the fisheries sector, 203 p.). The data and estimation procedures should be explained in the national programme.

In case this methodology cannot be applied, appropriate justifications should be given in the NP.

6.19. ON THE ESTIMATION OF EMPLOYMENT.

SGRN would point out that the methodology for the estimation of employment (engaged crew and FTE) should be in accordance with the Study FISH/2005/14 (2006, Calculation of labour including full-time equivalent (FTE) in fisheries, 142 p.) and amended by the SGECA 07-01 report and should be explained in the national programmes.

6.20. ON THE CONSISTENCY OF DIFFERENT ECONOMIC DATA SOURCES

SGRN recognizes the necessity to use different data sources to collect economic variables. However, SGRN reminds MS that in this case the DCF requires Member States to ensure consistency and comparability of all economic variables when derived from different sources (e.g. surveys, fleet register, logbooks, sales notes). SGRN asks MS to explain in the national program how the consistency of information derived from different data sources has been checked.

6.21. ON CLUSTERING OF SEGMENTS

SGRN reminds MS that in case of clustering of segments, the scientific evidence justifying it should be explained in the text. At the same time, SGRN recognizes that no common methodology exists on the approach to be followed and to assess whether or not clustering of fleet segments is appropriate. SGRN recommends that this issue will be discussed in the next SGECA meeting on data quality (May 2009).

6.22. ON THE COVERAGE OF POPULATION

MS has to cover all the fleet and collect the required data also for inactive vessels. Most of the MS do not provide any information about inactive vessels in the relevant tables of the national programs.

6.23. ON THE AVAILABILITY OF FINAL ESTIMATES

SGRN reminds MS to indicate in the national programs when the final validated data will be available, as required in the guidelines.

6.24. ON THE ESTIMATION OF ECOSYSTEM INDICATOR – FUEL EFFICIENCY

SGRN reminds MSs that according to the guidelines, they have to provide the method of estimation of fuel efficiency of fish capture in the Section III.B of the NP. Not all the MS provided this information in the section mentioned. SGRN reiterates that MS to follow the guidelines.

6.25. ON THE CALCULATION OF IMPUTED VALUE OF UNPAID LABOUR

SGRN reminds MS that methods of calculation of imputed value of unpaid labour have to be explained in the national programs. This request refers to fishery, as well to aquaculture and processing industry. SGRN recognizes that there is no common methodology of calculation of imputed value of unpaid labour and suggests that this methodology be proposed by SGECA.

6.26. ON FISHERIES CONDUCTED UNDER A DEROGATION REGIME.

The Data Collection Regulation does not make any specific mention to the fisheries acting under a derogation regime (i.e. several Mediterranean fishing practices allowed till 2010). This grey area is particularly relevant, because the absence of a specific obligation to collect data on these fishing activities will make it impossible to evaluate the effects of the derogations. This can also negatively affect the national management plans. SGRN recommend that each fishery acting under a derogation regime “should” be identified, included in the ranking system and sampled if selected.

SGRN proposes that specific pilot studies or research projects should be undertaken by the MS concerned and results included in the NP. Due to the fact that several fishery management plans also include fishing activities conducted under a derogation regime, SGRN underlines the urgent need to resolve the issue.

6.27. ON SAMPLING IN DISTANT AREAS.

Carrying out the data collection on EC fishing fleets operating in distant waters (CECAF, South Atlantic, Antarctic, Indian Ocean, Pacific Ocean, etc.) have been an issue in several NP in previous years. In 2009, several MS concerned are requesting derogations for sampling these fleets or are simply not properly reporting their activities. SGRN recall that all the fishing agreements with non-EU third Countries are established with the framework of the Common Fishery Policy and following the philosophy of the Green Paper adopted by the European Commission in 2008. According to COM(2002)637-final. The fishing agreements with non-EU third Countries are possible only if there is “a sustainable exploitation of fishing resources, based on sound scientific advice, coherent with the Community objective to avoid overexploitation of the stocks concerned. Therefore fishing possibilities must be in line with and based on best available scientific data.” Furthermore, SGRN notes that all the various

versions of the Data Collection Regulation included the obligation to sample the entire EU fishing activities, independently from the ocean where they are carried out. On these strong basis, SGRN invites STECF to recommend that no derogations should be provided for collecting data in all areas where EC fleets are operating accordingly to fishing agreement with non-EU third Countries. SGRN underlines that all target species concerned and all species for which it is mandatory to collect data according to the provision of the RFMO concerned, must be included in the NP of each MS concerned.

6.28. ON TUNA CAGING ACTIVITY (TUNA FARMING AND TUNA FATTENING) – COLLECTION OF ECONOMIC DATA.

At the moment, several member states involved in tuna farming activity included these plants among the aquaculture sector. Tuna caging plants have been supported by aquaculture subsidies and this activity is included by FAO among the aquaculture systems (wild-caught aquaculture). SGRN recommends that all MS having tuna farms shall include them among the aquaculture plants and carry out the data collection activities required.

6.29. ON TUNA CAGING ACTIVITY (TUNA FARMING AND TUNA FATTENING) – COLLECTION OF BIOLOGICAL DATA.

According to the ICCAT Rec.06-07, art.2c, the levels of biological sampling of bluefin tuna kept in cages have been defined. The obligation for the country where cages are located to ensure the sampling and cooperation agreements with all third countries where tuna cages are eventually located will be established. The very recent ICCAT Rec.08-05 clearly establish the responsibility for the data collection at the harvesting of the country concerned by the tuna farming or fattening activity. In the same ICCAT Rec.08-05, art.89, it is established that the ICCAT Regional Observer Programme shall monitor the harvest of bluefin tuna from 100% of the cages and that the data collection will be according to the ICCAT Rec.06-07, including the scientific work. SGRN notes that these provisions do not prevent MS to ensure that the required EC data collection is fully accomplished. SGRN recall the responsibility of the MS concerned about the responsibility to properly carry out the data collection on bluefin tuna caught by the national fisheries (EC Reg.199/2008, art. 9) or the responsibility for ensuring the biological sampling of the MS on whose territory the first sale takes place (Comm. Dec. 6 November 2008, 2008/949/EC). The latter EC Decision also reports the provision that, if necessary, MS shall cooperate with the authorities of non-EU third countries to set-up the biological sampling required. SGRN notes that all the previously mentioned legal provisions might appear unclear in order to establish on which NP (the MS carrying out the bluefin tuna fishery for caging or the MS where cages are located) the necessary sampling is to be included. SGRN supports the opinion that MS where cages are located shall ensure the data collection at the harvesting and that bilateral agreements are to be established with the Country of the flag fishing vessel(s) concerned. SGRN notes that sampling bluefin tuna in cages is not well addressed by several NP and no mention of bilateral agreements is included in any of the MS concerned either by the bluefin tuna fishery or by the tuna cages. SGRN recommends that a particular attention should be devoted to better identify the MS responsibilities for the sampling in cages and to establish the necessary agreements urgently

before the 2009 bluefin fishing season, due to the relevance of this particular activity. SGRN also recognise that data collected from tuna cages will bias the data coming from the wild population as the level of natural mortality and growth are clearly different. SGRN recommends that clear guidelines should be developed on how these data are incorporated into routine stock assessment.

6.30. ON DATA COLLECTION ON SHARKS CAUGHT BY LARGE PELAGIC FISHING ACTIVITIES.

All pelagic sharks caught by all fisheries directed to tuna and tuna-like species in the ICCAT convention area must be reported to ICCAT (Rec.04-10 and Rec.07-06 for all shark species concerned, including task I and task II data, followed by Rec. 08-07 specifically for the bigeye thresher shark, *Alopias superciliosus*). This fact implies that all the pelagic shark species shall be reported in terms of catch and possibly monitored, independently from the fact that they are target or by-catch species. The EC Data Collection Regulation impose the fully implementation of the obligations deriving from the various RFMOs. SGRN remarks that the current list of species includes a category (Sharks-like *Selachii*) which is not allowing the distinction between pelagic and demersal shark species, creating a serious problem about the mandatory sampling of pelagic shark species. SGRN recommends that all MS concerned with large pelagic fisheries, make every effort to report catches of pelagic sharks at the species level and establish the proper sampling for the pelagic species to be reported to ICCAT or other RFMOs. SGRN would point out that this is in line with the new EU Shark Action plan.

6.31. ON DATA COLLECTION FOR FISHING ACTIVITIES USING GEARS NOT LISTED AMONG THE RECOGNISED ONES.

If a fishing activity is carried out by a MS by using a gear not officially listed and if this segment is relevant in term of catches or to improve the data used for the stock assessment of the target species concerned, then SGRN recommends that the related sampling shall be properly included in the NP, by using the general gear category and appropriate codification. SGRN recommends that the gear category to be used for the data transmission to the RFMO concerned should use an appropriate codification and encourage co-operation among relevant MS.

6.32. ON LIST OF SPECIES FOR DISTANT WATER FISHERIES

During the evaluation process, it was evident that some MS have fleets fishing in distant waters (i.e.: various Pacific Ocean areas) and were asking for a full derogation for certain target species because they did not appear on appendix VII of the new DCR. Due to the relevance of the quantities reported, SGRN recommends that MS concerned shall detail by

species their catches in distant areas and submit these lists to STECF, with the purpose to propose amendments and improvements of the current appendix VII. SGRN point out those sampling stocks providing relevant quantities of catches in distant waters is an obligation of the EU MS, according to the Common Fishery Policy.

6.33. ON TABLE CONTENT INCONSISTENCIES

SGRN noted that large amount of inconsistencies in the information presented in the tables between Member States. In order to improve consistency, the use of drop down menus in the template tables provided to MSs should be explored.

7. EVALUATION OF MEMBER STATES NATIONAL PROGRAMMES

7.1. BELGIUM

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines ?	MOSTLY	1
Did NP have all the necessary Mandatory Standard Tables ?	NO	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	
Is the general description of the Fisheries comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	1
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?		2
Are amendments required to the MS National Programme?	YES	3

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations in the Belgium NP.

3 SGRN refer MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

In terms of coordination meetings and exchange programmes (e.g. EU, ICES plus others), a number of meetings listed in Table IIb1 appear to be from the 2008 programme and are not relevant for 2009. Others that are relevant are not included. MS acknowledges that information on these meetings was incomplete, but the list needs to be revised/finalised.

Nothing is referenced in the NP terms of formal bilateral agreements

Section III.B - Economic variables

The text contains very little information on the methodology that will be used. Ms should provide further details and also information on the methods that will be used in case of low response rate in order to get reliable estimates.

Fleet segmentation in table III.B.1 is not consistent with appendix III of the DCF (naming of segments and vessel length classes).

In table III.B.3 data sources and sampling strategy should be provided separately for each variable.

MS should indicate when the final data will be available.

No information is given on the calculation of the ecosystem indicator fuel efficiency. See general comment on the estimation of “fuel efficiency” indicator.

No derogation required

Section III.C - Biological - metier-related variables

Derogations and non-conformities

Derogations are not dealt with in the right part of the National Programme. Derogations are sought for:

Belgium requests derogation for Roundfish in bottom trawl in IV and VIId; An arrangement has been reached in RCM NS&EA 2008 with France. SGRN is of the opinion that such agreement is a way forward reducing the sampling workload. (See also general comment on the metier matrix.)

Belgium requests derogation for Nephrops in IV; justification cannot be verified; low proportion of total North Sea catches. - **M1**-. (See also general comment on the metier matrix)

Belgium requests derogation for brown shrimp (*Crangon*) in IV; justification very complex and does not seem rational. MS to prove the non impact of this fishery on discarding juveniles of flatfishes.

Belgium requests derogation for Sampling eel; justification almost no marine catches of eel; inland sampling is not mentioned. MS to provide evidence for not planning actions regarding sampling of inland eel.

Belgium requests derogation for sampling TBB_MCD_70-79_0_0 in the Bay of Biscay (ICES divisions VIII abde). SGRN notes, based on MS NP proposal 2007, Annex 1, that the discard rates of some species are substantial (hake, monkfish, *Nephrops*, rays) and cannot endorse a derogation on the basis of low discarding. SGRN further notes that this métier is given to be monitored at sea by MS, in the RCM NA 2008. To be clarified by MS.

Belgium requests derogation for sampling its whitefish directed bottom trawl fisheries in IV and VII d. This is the identical rationale as in former years NDGPs, which has always been approved. SGRN recommends MS to seek coordination with MS in the same area, fishing with similar métier. Such coordination has to be agreed within RCM NA.

Belgium requests derogation to sample eel length and age for both the NS&EA and NEA region. SGRN recommends MS to sample eel for length on every occasion, following the sampling scheme specified in the DCF, and endorses the request for derogation for sampling other biological variables

Section III.D - Biological - Recreational fisheries

Derogations and non-conformities

No derogations are sought. It is mentioned that no recreational fishery for eel exists. The recreational fishery for cod will not be sampled in 2009 and 2010 following a SGRN recommendation. SGRN reiterates its comments from July 2007; *“In the light of the above, SGRN (i) concludes that there is no urgent need for routine data collection on the recreational fisheries for cod, and (ii) recommends that a standard methodology should be developed before any new pilot or routine data collection programmes are set up on recreational fisheries. Any such standard methodology should not be restricted to particular species, but should address recreational fishing activities in general. The process of developing such a standard methodology should be initiated by PGCCDBS and PGMed.”*(SGRN, July 2007, page 142). SGRN recommends the MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational Fisheries (WKSMTF) to be held in Nantes in May 2009.

Section III.E - Biological stock related variables

Derogations and non-conformities

No sampling of eel as no eel are landed in the MS

Section III.F - Transversal variables

The restricted list is the correct reflection of species composition of the landings, as long as this is still actual, it is acceptable. The list of the restricted list must be in added in annex, reference in text is not correct. SGRN consider that this non conformity is justified and does not affect the precision level of the DCF.

Problem of mixed landings: some of the landings and sale of fish and shellfish are too small to justify the cost of sampling separately. SGRN consider that this non-conformity is justified and does not affect the precision levels of the DCF SGRN invites MS to take into account the outcome of the forthcoming PGCCDBS on this specific issue

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Derogations and non-conformities

Aquaculture

Belgium states, that research in respect of the regulation 762/2008 of EP and EC, carried out by the Federal Department of Economics, has shown the non importance of the Belgian Aquaculture sector. In 2007 a total amount of 127 tons has been produced. Some more information about the composition of this production would be interesting, maybe also about the value. It would also be interesting to get more information about the number of enterprises or employees and how Belgium investigated the sector, e.g. where they got their information and data from. Information should also be given, if the Federal Statistical Office of Belgium collects data from this sector or not, especially when it reaches a certain threshold of size or employees.

The Definition of Data Collection Needs for Aquaculture Interim Report lists a production amount of 1200 tons and a production value of €3.5 million in Belgium. SGRN requests the MS to clarify this issue.

SGRN also points out that if this derogation is given, and in the light of the rapid growth of aquaculture activities in the world, provisions should be made to make sure that data collection starts when the sector reaches a certain threshold which has to be defined.

Processing industry

Belgium gives no data in the templates and has a comment “under construction”. It states: “the data and its results were not up to standard, mainly due to the low overall response rate and the impossibility of the companies to answer to the questionnaire in full detail.” It is unclear why it is impossible for the companies to answer the questionnaire.

Belgium states that “the complete and detailed description for Module 3.B (new DCR) could not be finalised before the official deadline of 15th October 2008, neither before the extended deadline of 31st October 2008.” This evaluation takes place in February 2009 and there is still no information regarding the description for Module 3.B.

No information concerning the sector in terms of enterprises belonging to the sector, no variable definitions and no sufficient information on data sources (only that a questionnaire will be sent out) and no sufficient information concerning data quality (only that in previous years response rate and quality was low) or statistical methods are provided. SGRN insists that MS must follow the provisions of the DCR and provide the required information.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

Ecosystem indicators 5,6 & 7 are clearly demarcated as VMS-based in Council decision 949_2008. However, Belgium proposes ‘sampling by métier of biological variables’. This is not appropriate. The proposal later states that VMS data will also be used, but appropriate algorithms need to be developed. The timeline for development of this algorithm should be stated – it is impossible to review otherwise.

Section VII. – Follow-up of STECF recommendations

A comprehensive year-by-year summary is available. The current SGRN view is that this was unnecessary given the fact this is a new framework and previous STECF recommendations do not apply to it

Section VIII. - List of derogations

The list of derogations appears to be comprehensive.

Section IX. - Comments, suggestions and reflections

Belgium makes a strongly worded request for clear guidance from the commission as to which regulation/directive they should seek financial support for its eel sampling programme.

ENDS

7.2. BULGARIA

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	YES	1
Did NP have all the necessary Mandatory Standard Tables?	NO	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	2
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	MOSTLY	3
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	
Are amendments required to the MS National Programme?	YES	4

1 SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 The lack of information in some tables makes it difficult to evaluate the derogations requested.

3 SGRN considers that some derogation cannot be accepted; more information has been requested to evaluate some others.

4 The NP is in general in line with the DCF however minor adjustments have to be made according to the specific comments listed below.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

MS should add MEDIAS International coordination under table II.B.1

Section III.B - Economic variables

No information is given on the collection of the following variables: direct subsidies, other income, financial position, capital value, capital cost, investment, employment (only engaged crew is considered). Table III.B.3 should report all the variables listed in appendix VI of the DCF. MS to clarify.

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. SGRN refers MS to the general comment on the consistency of different data sources.

The sampling strategy is not described in details and further information should be given regarding methods to determine the sample size and to raise the final estimates to total population. Table III.B.1 and III.B.3 are not consistent (for instance it is not clear if pelagic trawls will be covered by a census or a sample).

MS should indicate when the final data will be available.

No information is given on the calculation of the ecosystem indicator fuel efficiency. See general comment on the estimation of the ecosystem indicator “fuel efficiency”.

Section III.C - Biological - metier-related variables

NP covered all the population, however MS should clarify which data sources are used for small scale < 10m and large vessels. This cannot be determined from the text.

SGRN notes that not all metiers are present in the standard table (III.C.1), but just those picked up by the ranking system. MS should avoid excluding metiers from the ranking system, as SGRN may not assess their relative importance. A full Table III-C-1 should be resubmitted.

The data used for the ranking system (effort, landings, value) should be described in the text not only in the table. Moreover SGRN request MS to better specify which data was used and if they covered all the population vessel or part of the population (Table III.C.1).

SGRN notes that concerning the sampling protocol the minimum number of discard trips should be 8, unless the fishing season is less than one year. MS should specify the fishing closures (e.g. close season) per metier as this will effect the number of sampling trips required. More clarifications are needed.

SGRN suggest that in table III.C.4, the column with the number of fish necessary to achieve the precision target should be blank for species for which precision level was not calculated, unless statistical analysis was conducted to estimate the minimum no of fish.

Concerning the initiatives taken to coordinate the sampling programme with countries of the same marine region a bilateral agreements should be sought with Romania. SGRN accept the requested derogation.

Section III.D - Biological - Recreational fisheries

Though MS implies that no eel recreational fishery exists, no derogation is requested. MS should explicitly request derogation in the relevant section of its NP.

Section III.E - Biological - stock-related variables

SGRN recommends to MS to add all the species as present in Appendix VII of the Commission Decision 949/2008 for the Black Sea and to complete all table following the guidelines (SGRN 08 01).

SGRN requested to MS to include *Trachurus trachurus* and *Squalus acanthias* in the tables and to provide explanation and justification if derogation will be requested.

SGRN notes that in Table III.E.3 MS provide the required number of fish to reach the precision target for all the species without give any methodology and/or statistical evidence.

SGRN invites MS to provide both methodology and statistical evidence or to left blank the column in case no estimates have been performed.

SGRN notes that MS propose to sample sex, weight and maturity the proposed species every year. SGRN appreciated the initiative but request to MS, before to carried out the sampling scheme, to find out an agreement at Regional level (RCMMed and Black sea) or sample by the Regulation (every three years).

MS should list the derogations demanded and comment on their justification.

It is likely that pelagic trawlers could catch also tuna-like species (i.e.: *Sarda sarda*) which are reported in other pelagic fishery in the Black Sea. It should be relevant to provide a complete overview of the catch composition of the pelagic trawlers, with the purpose to understand if these species are present or not, because it is relevant for their stock assessment. In principle, at least *Sarda sarda* should be included among the species listed on Table III C 4, with the note that sampling will be conducted on opportunistic base.

Section III.G - Research surveys at sea

SGRN notes that there is no correspondence concerning the names of all the surveys. MS should strictly follow the names of the surveys as included in Annex IX. MS should revise the related table.

In Table III.G.1 the maximum days for each survey is not provided; MS should provide the maximum days, as stated in Annex IX of the Commission Decision 949/2008.

SGRN notes that MS proposes the conduction of a pilot ichthyoplankton survey. SGRN consider this survey not eligible under the present DCF (see Annex IX of Commission Decision).

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

A description of the sector is given with information on volume of production, number of enterprises and main species, mostly referring to 2007. Some more information could be given concerning value and number of employees. Bulgaria gives sufficient information in tables IV.A.1 and IV.A.2. Bulgaria plans 100 % sampling rate for each segment and parameter, but the target rate planned is 5% in table IV.A.3. MS should clarify this.

MS does not list all parameters according to Comm. Dec 2008/949 in table IV.A.3. MS is requested to revise this table.

Some information on data sources and data quality is given, it remains unclear what logbook data can deliver in the case of aquaculture. No information on methodology is given, especially not concerning the low planned sampling rate and methodology to ensure representativeness.

No information on variable definitions is given.

No derogations are mentioned, but there are a lot of them in the text. MS is requested to revise this section of the NP.

Processing industry

MS gives some but not all necessary information on data quality, sources, and methods. Especially methods used to ensure representativeness should be mentioned where necessary.

Table IV.B.2 does not report the necessary list of variables/parameters and does not correspond to the table IV.B.1 concerning sample rates planned and methods used. MS is requested to revise table IV.B.2.

Concerning variable definition for parameter to be collected, MS refers to the old DCR. In fact, fixed costs are not mentioned in DCF anymore, even the definition of financial costs has changed, raw material has not to be collected by species. MS should clarify this point and should revise this section of the NP with regard to the new DCF.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

SGRN notes that the estimation of all indicators is missing in proposal of the MS. MS states that VMS information is not available. SGRN notes that indicators 1-4 could be calculated using the survey data. MS should compile the table with available information and give a justification for missing ones.

Section VI. - Module for management and use of the data

MS give a clear description of the storage database system. However, the quality control and validation process is missing. MS should update the text. SGRN encourage the MS to participate to the relevant meetings. MS should clarify if data are provided to all relevant WGs.

ENDS

7.3. CYPRUS

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	YES	1
Did NP have all the necessary Mandatory Standard Tables?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	YES	4
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	MOISTLY	2
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	
Are amendments required to the MS National Programme?	YES	3

1 SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 SGRN considers that more information should be supplied in order to evaluate some non-conformity.

3 The NP is in general in line with the DCF however minor adjustments have to be made according to the specific comments listed below.

4 SGRN refers MS to the general comments.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

It is not clear if all the population is covered. In particular, MS should clarify if the new category of professional fishermen introduced in 2008 will be considered or not.

The sampling protocol is well described, in particular the allocation of vessels within segments. But further information should be given regarding the methods used to determine the sample size and to raise the final estimates to total population.

Clustering of segments is clearly reported, but for each clustering, the scientific evidence justifying it should be explained in the text. See general comment on clustering of segments.

Employment should be estimated according to the methodology of the study reported in the DCF. See general comment on estimation of employment..

MS should indicate when the final data will be available.

No information is given on the calculation of the ecosystem indicator fuel efficiency. See general comment on the estimation of the ecosystem indicator “fuel efficiency”.

No derogation required.

Section III.C - Biological - metier-related variables

SGRN notes that sampling onboard of drifting long-lines, targeting large pelagic fish, will start only in 2010. MS should specify why this sampling program will not start in 2009 (it will imply that discards will not be collected in 2009).

In table III.C.3 only one whole number of total number of trips and planned number of trips should be given, the table should be simplified since this is confusing. MS should submit the new table.

In Table III.C.4 no information is given on the minimum number of fish necessary to achieve the precision target, this should be available from past sampling programs.

SGRN notes that the requested derogation is not clear. MS should better clarify this point and specify also for which species and metiers/discards derogation is requested. MS should submit an explanation possibly based on discards information for each metier and statistical evidence must be proved.

Section III.E - Biological - stock-related variables

In Table III.E.3 no information is given on the minimum number of fish necessary to achieve the precision target, this should be available from past sampling programs.

In table III.E.3 SGRN suggest revising the number for the “Minimum required for age at national level”

The NP should include all the ICCAT mandatory species (*Istiophoridae*, tuna-like species and pelagic sharks), even if they are caught as a by-catch (improve the table CIII4 accordingly). Even if not is specifically requested, SGRN suggests that the minimum number of samples for the most relevant large pelagic species should help in evaluating the Cyprus NR.

Section III.F- Transversal variables

MS should better explain the methodology used for collecting the data for all vessel segments (census/survey/sampling).

MS should better explain the data sources for the effort variables. In the cases of sampling, MS should provide more detailed information on the methodology and raising methods.

MS should better explain the methods used for evaluating the landings (sampling at landing site and fishmonger's).

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

A description of the sector is given with information on volume and value of production, number of enterprises and main species, referring to 2007. Cyprus will not collect data on fresh water species.

Cyprus gives all information in tables IV.A.1 to IV.A.3. It plans 100 % sampling rate for each segment and parameter, SGRN appreciate this.

MS gives sufficient information on data quality, sources and planned sampling methods. MS does not give information if it collects employment data by gender. MS should clarify this point.

Regarding capital value MS is request to clarify the definition given in the program, as it seems there is confusion with the definition of “investment”.

Concerning derogation, MS mentions: « (...) taken into account that this module has been introduced in the DCR for the first time some problems may arise in estimating all the parameters required by the current Decision.

It is important to have in mind that some of the firms involved in the production of sea bass and sea bream are also engaged or have acquired broodstock with the intention of engaging in the production of other marine fish, namely, *Pagrus pagrus*, *Pagrus major*, *Diplodus puntazzo*, *Salpa salpa*, *Siganus rivulatus*, *Argyrosomus regius*, *Dentex dentex* and *Pagellus erythrinus*. However, the production of these species is on a very low scale. Furthermore, some of the firms involved in the production of trout are also dealing with the production of *Acipenser baeri* but again on a very low scale. The quantities produced for the species described above are so small that they will be included in the main segments: sea bass and sea bream and trout respectively. This seems to be plausible.

Processing industry

MS gives all necessary information on data quality, sources, definitions and methods in the text and in the tables. Cyprus is planning a census, SGRN appreciate this.

MS does not give information if it collects employment data by gender. MS should clarify this. Regarding capital value MS is request to clarify the definition given in the program, as it seems there is confusion with the definition of “investment”.

No derogation required.

Section VI. - Module for management and use of the data

.SGRN encourage the MS to participate to the relevant meetings.

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Section VIII. - List of derogations

The list should be updated in case the MS wishes to request additional derogations in its 2009-2010 NP, e.g. not discard sampling of drifting long-line fishery on an annual basis.

ENDS

7.4. DENMARK

A) GENERAL COMMENTS:

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	MOSTLY	1, 2
Did NP have all the necessary Mandatory Standard Tables?	NO	2
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	2, 5
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	2
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	
Are amendments required to the MS National Programme?	YES	2, 3, 4

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 National metiers stratification table and Module V are missing. In the economical part, fishing sector and processing industry, MS refer to only 2008 while the programming year should be 2008-2009.

3 Table VI.B.1 is missing.

4 Module V, Table VI.B.1 and Annex I are missing. Discard level for metiers which are not selected by ranking is not included in the NP. See General comments on Discard and landings sampling.

5 SGRN refers MS to the general comments.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

Denmark has yet to populate the list of co-ordination meetings to be attended.

Section III B - Economic Variables

No Derogations sought.

Section III.C - Biological - metier-related variables

Derogations and non-conformities

See General comments on discard and landings sampling.

Derogations and non-conformities

Denmark has requested derogations for 31 métiers (see table below). The justification is mostly due to an “expected change of behaviour when observers are send on board ” or “proved low discarding”. In the later case derogation for sampling discards can be given. However, SGRN notes that at least some of the métiers listed below have been merged with others for sampling and the derogation should be asked for the group métier which have been merged. Also it appears that the derogation is asked for sampling discards only and suggest that landings will be sampled in harbours. SGRN found this difficult to clarify because the name of the métier cannot be found in the sampling table because it is merged with others.

Metiers Level 6	Fishing ground	Reason for applying for derogation	Comment
OTM_SPF_32-69_0_0	27.I+II	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metier has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	To be discussed in RCM NS&EA

PS_SPF_ALL_0_0	27.I+II	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	To be discussed in RCM NS&EA
PTM_SPF_32-69_0_0	27.I+II	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	Evaluate the possibility of merging with OTM_SPF_32-69_0_0. To be discussed in RCM NS&EA
GNS_DEF_120-219_0_0	27.IIIaN	Sampling carried out in 1995-2002 have shown that discard for this metiér is less than 5 %.	Ok. Provide the reference.
OTB_SPF_16-31_0_0	27.IIIaN	This is a fishery for sprat. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
OTB_SPF_32-69_0_0	27.IIIaN	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	To be discussed in RCM NS&EA
OTM_SPF_32-69_0_0	27.IIIaN	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this	To be discussed in RCM NS&EA

		metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	
PS_SPF_ALL_0_0	27.IIIaN	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	To be discussed in RCM NS&EA
PTM_SPF_32-69_0_0	27.IIIaN	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	Evaluate the possibility of merging with OTM_SPF_32-69_0_0. To be discussed in RCM NS&EA
GNS_DEF_100-119_0_0	27.IIIaS	Sampling carried out in 1995-2002 have shown that discard for this metiér is less than 5 %.	Ok. Provide the reference.
GNS_DEF_120-219_0_0	27.IIIaS	Sampling carried out in 1995-2002 have shown that discard for this metiér is less than 5 %.	Ok. Provide the reference
GTR_DEF_120-219_0_0	27.IIIaS	Sampling carried out in 1995-2002 have shown that discard for this metiér is less than 5 %.	Ok. Provide the reference
OTB_DEF_16-31_0_0	27.IIIaS	This is a fishery for sandeel. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok

OTB_SPF_16-31_0_0	27.IIIaS	This is a fishery for sprat. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
OTM_SPF_16-31_0_0	27.IIIaS	This is a fishery for sprat. No discard occur for this fishery as all catches are landed unsorted in the harbours. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
PTB_DEF_16-31_0_0	27.IIIaS	This is a fishery for sandeel. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
PTM_SPF_16-31_0_0	27.IIIaS	This is a fishery for sprat. No discard occur for this fishery as all catches are landed unsorted in the harbours. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
PTM_SPF_32-69_0_0	27.IIIaN	This is a fishery for herring. No discard occur for this fishery as all catches are landed unsorted in the harbours. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
GNS_DEF_100-119_0_0	27.IV+VIId	Sampling carried out in 1995-2002 have shown that discard for this metiér is less than 5 %.	Ok. Provide the reference
GNS_DEF_120-219_0_0	27.IV+VIId	Sampling carried out in 1995-2002 have shown that discard for this metiér is less than 5 %.	Ok. Provide the reference
GNS_DEF_90-99_0_0	27.IV+VIId	Sampling carried out in 1995-2002 have shown that discard for this metiér is less than 5 %.	Ok. Provide the reference
GTR_DEF_120-219_0_0	27.IV+VIId	Sampling carried out in 1995-2002 have shown that discard for this	Ok. Provide the reference

		metiér is less than 5 %.	
OTB_DEF_<=15_0_0	27.IV+VIId	This is a fishery for sandeel. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	Ok
OTB_DEF_16-31_0_0	27.IV+VIId	This is a fishery for sandeel. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	Ok
OTB_SPF_16-31_0_0	27.IV+VIId	This is a fishery for sprat. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	Ok
OTB_SPF_32-69_0_0	27.IV+VIId	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	To be discussed in RCM NS&EA
OTM_SPF_32-69_0_0	27.IV+VIId	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	To be discussed in RCM NS&EA
PS_SPF_ALL_0_0	27.IV+VIId	This is a fishery for herring and mackerel. Discard occur for this	To be discussed in RCM NS&EA

		fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	
PTB_SPF_16-31_0_0	27.IV+VIId	This is a fishery for sprat. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
PTM_SPF_16-31_0_0	27.IV+VIId	This is a fishery for sprat. No discard occur for this fishery as all catches are landed unsorted and used for fish meal and oil production. Therefore, catches can be sampled in the harbours. This minimizes the cost for sampling.	ok
PTM_SPF_32-69_0_0	27.IV+VIId	This is a fishery for herring. Discard occur for this fishery but previous years experience when sampling this metiér has often shown change of fishing pattern when having observer onboard. Furthermore, when discarding it occurs seldom but when discarding it is large quantities. Catches can be sampled in the harbours. This minimizes the cost for sampling.	Ok Evaluate the possibility of merging with OTM_SPF_32-69_0_0. To be discussed in RCM NS&EA

Section III.E - Biological - stock-related variables

There appears to be an inconsistency in table III_E_1_Baltic, as species that are not landed have been included in the sampling for biological variables. To be clarified by the MS.

Derogations and non-conformities

MS seeks a derogation for sampling fecundity data for horse mackerel and mackerel because no survey is conducted by the MS in the time period appropriate for sampling the data. SGRN recommends MS to investigate other means of collecting this data (e.g. commercial fisheries, sentinel fisheries).

Section III.F - Transversal variables

Effort data

List the derogations demanded and comment on their justification.

MS asked for derogation about “Hours fished” and “Number of gears”. SGRN recognise that according to latest RCM, the upcoming revision of the logbook regulation should assure that all effort variables in Appendix VIII of the Commission Decision 2008/949/EC can be derived from logbooks. SGRN recommends MS to investigate other means for the collection of this information

Section III.G - Research surveys at sea

MS should refer to comments on Review of Surveys.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Derogations and non-conformities

Aquaculture sector

No derogations are mentioned.

Processing industry

No derogations are mentioned.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

This section has not been completed. No derogation has been requested

Module V is missing and should be provided by MS.

Section VII. – Follow-up of STECF recommendations

MS did not provide details, just a general comment on a favourable past performance

Section VIII. - List of derogations

Is there a list going back in time? Or is it the list for the current year?

Only for the current year.

Is it incomplete or comprehensive?

The list appears to be comprehensive although not cross-checked against the text of the proposal.

ENDS

7.5. ESTONIA

A) GENERAL COMMENTS:

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	MOSTLY	1, 2
Did NP have all the necessary Mandatory Standard Tables?	No	2
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	2
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	1, 4
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?		
Are amendments required to the MS National Programme?	YES	2

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 Table IIIE.3 was not filled in.

3 Discard level for metiers which are not selected by ranking is not included in the NP. 4 SGRN refers MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

It seems that not all the population is covered by NP in the standard tables. SGRN reminds MS that some economic parameters have to be collected for inactive fleets. SGRN refers MS to the general comment on the coverage of population.

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. SGRN refers MS to the general comment on the consistency of different data sources.

There is no explanation of the methods of raising the sample results to the total population. MS has to provide this information.

Most of variables required by DCF is missing in the Standard table III.B.3. MS has to follow the DCF and guidelines and provide the missing information in NP.

It is also required by DCF (Annex VI) to explain the methods of calculation of imputed value of unpaid labour in the text of NP. MS has to provide the missing information.

Section III.C - Biological - metier-related variables

Derogations and non-conformities

See General comments on discard and landings sampling.

Section III.D - Biological - Recreational fisheries

SGRN recommends the MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational Fisheries (WKSMRF) to be held in Nantes in May 2009.

Section III.E - Biological - stock-related variables

Number of fish to be sampled for each species is missing. (Table III.E.3).

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

There is no explanation of the methods of raising the sample results to the total population. MS has to provide this information.

Most of the variables are missing in the standard Table IV.A.3. No information about the method of calculation of imputed value of unpaid labour presented in the text. MS has to provide the missing information to the Commission.

There is no information then the data for aquaculture sector will be available. MS should provide this information.

Processing industry

There is no explanation of sampling protocol.

The method of raising the sample results to the total population is not presented in the text. MS has to provide this information.

The list of variables in the standard table IV.B.2 is not complete. MS has to provide the information regarding sampling strategy of all variables listed in the DCF.

Section VIII. - List of derogations

The list contains both new and old derogations. It is complete and comprehensive.

ENDS

7.6. FINLAND

A) GENERAL COMMENTS:

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	Mostly	1, 2
Did NP have all the necessary Mandatory Standard Tables?	Yes	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	Mostly	4, 3
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	4
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?		
Are amendments required to the MS National Programme?	YES	2

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 MS did not include Metiers that were not selected up after ranking system as requested by the guidelines.

3 Discard level of metiers not included in the sampling is missing.

4 SGRN refers MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. See general comment on the consistency of different data sources.

Derogations and non-conformities

SGRN reminds the MS that there is no possibility to ask for derogation on energy consumption in NP.

Section III.C - Biological - metier-related variables

Derogations and non-conformities

See General comments on discard and landings sampling. For salmon and sea trout, it is not clear why MS should not collect this data. The fact that discard data are not currently used in the assessment is not a reason to ask for discard derogations. To be clarified by MS.

Section III.E - Biological - stock-related variables

See General comments on Ranking system, merging procedures and sample optimisation.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

The method of raising the sample results to the total population is not presented in the NP. MS has to provide this information to the Commission.

It is required by DCF (Appendix X) to explain the methods of calculation of imputed value of unpaid labour. MS has to provide the missing information

ENDS

7.7. FRANCE

A) GENERAL COMMENTS:

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines ?	MOSTLY	1
Did NP have all the necessary Mandatory Standard Tables ?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	PARTLY	3, 4
Is the general description of the Fisheries Comprehensive ?	PARTLY	
Are there Derogations associated with the NP?	YES	5
Are there justified non-conformities associated with the NP?	?	1, 6
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	MOSTLY	
Are RCM recommendations taken into account?	Mostly	2
Are amendments required to the MS National Programme?	PARTLY	3, 4

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging métiers but nevertheless the mergers that are proposed are sensible.

2 The member state did update its proposals in line with RCM recommendations but the review group only had access to a non-updated English translation

3 SGRN refer the MS to the general comments

4 The inconsistency of some tables make difficult to evaluate the program. The lack of information in some tables makes it difficult to evaluate the derogations requested.

5 SGRN considers that some derogation cannot be accepted; more information were requested to evaluate some others

6 Better co-ordination should be sought with other MS

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

France acknowledges that a complete list of approved meetings was not available when the proposal was submitted. The reviewer had a list available and notes there are a number of meetings listed in Table IIb1 that are not covered in the approved list.

The NP appears to be exhaustive in terms of areas fished and totals landed and has a description of the relative importance of the mainland regional distribution of vessels. Table III a1 is present and accords with the written description. The table also references Antarctic fisheries that are not described in the text, but includes a comment that it is not covered by the regulation. The fisheries sector is poorly described. SGRN recommends MS to propose a comprehensive description of its fisheries in the adjustment of NP proposal 2010.

Section III.B - Economic variables

Sampling strategies described as “Census”, should have a 100% coverage rate, or otherwise be referred as surveys with the appropriate quality indicator. To be clarified by MS.

Derogation is sought for FTE calculations justified by a feasibility study planned for 2009 to collect data of working time in hours. SGRN reminds MS that a European study has already been carried out and invites MS to apply the results of this study. SGRN recommends MS to comply with the requirements of the DCF.

A derogation is sought for the variable “value of quotas” on the basis that there is no quota trading. This issue does not imply the need for derogation but only a null value of that variable that should be explained in the text.

Section III.C - Biological - metier-related variables

There are some inconsistencies in table III C 1, III_C_2 and III_C_3.

Table III C 3 appears merged metiers that do not appear in table III C 2 (e.g. OT. MOL_80-89_0_0). In table III C 1 appear three metiers, two of them picked up by the ranking system (area XII XIV) that do not appear in table III C 3. These metiers seem to be extensions of

other fisheries but the area do not appear in table III C 3 and is not possible to follow them. SGRN requests MS to revise and resubmit these tables.

Derogations and non-conformities

OTB_DEF_>=100_0_0 LARGE FREEZE TRAWLERS WITH RELATIVE SMALL CATCH AND HIGH SAMPLING COSTS; SGRN supports this Derogation. OTM_DEF_16-31_0_0 LARGE FREEZE TRAWLERS WITH RELATIVE SMALL CATCH AND HIGH SAMPLING COSTS; SGRN supports this Derogation

FPO_MOL_0_0_0; DIRECTED TO WHELKS NOT LISTED IN APPENDIX VII;

SGRN considers that the metiers targeting one species not listed in Appendix VII of the DCF, and generating marginal by-catch and discards may be eligible for derogation, but evidence on marginal impact on the by catch and discards must be given. SGRN would also refer the MS to the recommendations of the RCM NS&EA to carry out on board sampling on dredges targeting scallops for assessing their impact on discarding for sole.

The OTB_DEF_100-119_0_0 VIIa has been confirmed by RCM NA as an extension of the same metier in ICES division VIIe. SGRN considers that MS has thus to sample both areas when monitoring this metier.

Derogation for sampling metiers fishing mostly one species not listed in Appendix VII of the DCF (e.g. DRB_MOL targeting *Pecten maximus*, FPO_MOL targeting *Buccinum undatum* and GNS_CRU targeting *Maja squinado*, MISC_SWD)

LHM FIN VIIe and VIII. the argument is small catches but in tables is selected by effort. Hand lines has probably negligible discards but there is no description of the fishery and what species is directed to. SGRN requests more information to be sought from the MS.

SGRN notes that the system used for the ranking system is not clear; there are discrepancies between text and table III.C.1. Specifically, following the text it seems that only the effort has been considered for the ranking, whereas in the table some metier have been selected for value and landing. These points should be clarified.

MS states that a pilot study was conducted in 2007 to evaluate the landing, value and effort data; however, such data have not been presented. SGRN recommends the MS to present the results of the pilot study.

There is incoherency between the effort values reported in the text (in terms of month) and the table (in terms of days). MS should be consistent and report effort in days, as stated by the Commission Decision 2008/949/EC.

SGRN notes that from the text it is not clear how many metiers have been selected for sampling purposes. MS should better clarify this point.

Sampling protocol should be better specified for all the metiers selected.

SGRN notes that no sampling trips are proposed for discards for a certain number of metiers, while no derogations have been proposed for evaluating discards. MS should clarify whether it requests derogation for discard sampling certain metiers, providing the relevant justification.

In Table III.C.4 no information is given on the minimum number of fish necessary to achieve the precision target. SGRN notes that these values should be available from past sampling programs.

The methods mentioned to be used for assessing the quality of the data are not acceptable. SGRN recommends that more specific details should be given, such as the use of the precision level or specific procedure of the sampling technique.

SGRN suggests that a bilateral agreement should be sought between France and other Member States (i.e. Spain).

MS should clarify why only 6 species of Group 1 and only 1 of Group 2 have been selected for sampling. If derogation is requested for those species that are not present in table III.C.4, a justification must be presented (e.g. less than 200 tons in landings).

There is an incomplete list of Mediterranean catches on table III C 1. The French Polynesia fishery is missing on the same table. Many fisheries for large pelagic species in the North Sea and in the North Atlantic listed in table III C 1 are not included in the following tables.

Section III.D - Biological - Recreational fisheries

Derogations and non-conformities

Derogations for eel, salmon and cod in 2009 and 2010 with justification because catches in the North Sea are very low for all species; for cod based on a pilot study.

MS requests derogation for not sampling eel recreational fishery at sea, while it proposes a pilot study for eel recreational fishery in inland waters. SGRN supports the conduction of a pilot study by the MS and expects the outcomes of the pilot study in early 2010 for the setting of the 2011-2013 NP proposal.

Section III.E - Biological - stock-related variables

SGRN found inconsistencies in the NP proposals. For *Lophius* VII bk,VIIIabd planned sampling appears less than required. Some species *Coryphaenoides*, *Hoplostethus*, *Lepidorhombus*, *Molva*, *Trisopterus* are going to be sampled for age and not for other parameters (eg.weight). This is inconsistent. There are no consistence between table III E 2 and III E 3. Some stocks planned to sample for some parameters in in 2009 in III E2 do not appear in III E3(*Coryphaenoides*, *Hoplostethus*, *Lepidorombus*, *Molva*).

These issues are to be clarified by the MS

Derogations and non-conformities

The plaice (*Pleuronectes platessa*) of the VIIe is difficult to sample, due to their small numbers (119 tonnes³). The size structures are supplied to the working group but no biological parameters are collected. SGRN recommends MS to seek co-ordination with other MS in the same area fishing with a similar metier. Such co-ordination has been agreed within RCM. The catches of saithe (*Pollachius virens*) in areas VII and VIII are very small compared with areas IV and VI. It is supposed to be a marginal fishery of areas IV and VI. The same comment as above. SGRN recommends MS to seek co-ordination with other MS in the same area fishing with a similar metier. Such co-ordination has been agreed within RCM.

SGRN recommends MS to consider the sampling of this area as an extension of the area VI. [to be confirmed, this is scientifically relevant]

Derogation sought from sampling biological stock related information on *Melanogrammus aeglefinus* and *Pollachius virens* in zone I, II. SGRN considers this as justified by lack of opportunity to perform sampling (freezing trawlers and just above 10% French catch of TAC. This issue should be discussed at the RCM NS&EA.

SGRN notes that no regional coordination is planned. However, SGRN recalls that Spain and France have shared stocks in the Gulf of Lion (GSA 7), and invites the two MS to consider the possibility for a regional coordination for sampling stock-related variables, during the next PGMed and RCM MED&BS meetings.

MS should follow the SGRN 08-01 Guidelines for the completion of Table III.E.1. The table must provide landings data and share in EU landings for all the stocks that are included in Appendix VII of the Commission Decision 2008/949/EC.

MS proposes not to collect age data for *Dicentrarchus labrax*, since the species' landings are very close to 200 tons, while it proposes to collect the other stock-related variables of this species during the Medits and other surveys. SGRN considers that derogation is not justified to be granted, and recommends the MS to collect age data along with the rest of stock-related variables during the surveys.

The segments fishing for large pelagics in the North Sea and in the North Atlantic (reported on table III C 1) are not included on table III C 4. The level of bluefin tuna and swordfish sampling in the Mediterranean, bluefin tuna, albacore, swordfish, *Istiophoridae*, *Auxis* sp., *Euthynnus alletteratus*, *Isurus oxyrinchus*, *Lamna nasus*, *Prionace glauca*, *Sarda sarda*, Sharks-like Selachii in the Western and Eastern Central Atlantic, bluefin tuna, albacore, *Istiophoridae*, *Auxis* sp., *Euthynnus affinis*, *Isurus oxyrinchus*, *Lamna nasus*, *Prionace glauca*, *Sarda sarda*, Sharks-like Selachii in the Indian Ocean is not specified on table III C 4 and SGRN suggests that the minimum numbers of samples might allow a better evaluation of the French NR. Biological parameters (table III E 2) are not collected for bluefin tuna in all areas and for *Thunnus albacares* and *Thunnus obesus* in the ICCAT convention area. Age is not included for all large pelagic species.

The derogation is requested for many large pelagic species in the Mediterranean, in the ICCAT and in the IOTC convention areas, but the justification that there are incidental catches or transshipments (point 1.4.6, 1.5.23 and 1.5.28 of the NP) cannot be accepted. Even the low quantities for some species cannot prevent the data collection for species listed as

3 ICES, 2008. Report of the Working Group on the assessment of Southern Shelf Demersal Stocks (WGSSDS). ICES CM 2008/ACOM:12. 552 p.

mandatory ones by the RFOMs concerned. The specific derogation for bluefin tuna data collection in the Mediterranean (section VIII of the NP) is without any justification. SGRN recommends that all these species shall be included, even if the sampling should be opportunistic for some of them.

Section III.F - Transversal variables

List the derogations demanded and comment on their justification.

Comment: it is not clear if the MS demands for a derogation on the level of accuracy, or is it precision?

List the derogations demanded and comment on their justification.

Derogation is sought for the supply of the following variables:

- Number of trips
- Number of rigs
- Number of fishing operations
- Number of nets/length
- Numbers of hooks, number of lines
- Number of pots, traps
- Immersion time

These additional variables make it necessary for a statistical pilot study to be conducted in 2009 for a true picture of the existing situation and a feasibility study for restoring these different variables to the levels desired. All the effort variables will be provided at accuracy level 5 of Annex IV and not at level 6 as indicated in the Decision.

Comment: the derogation is acceptable, although a clearer justification should be provided. There is confusion created by stating: 'All the effort variables will be provided at accuracy level 5 of Annex IV and not at level 6 as indicated in the Decision', and demanding for the derogation regarding a set of effort variables.

SGRN agrees with the approach taken by MS for the year 2009, and expects the outcomes of the feasibility study at the latest in the NP proposal 2011-2013 for a full routine implementation.

Landings data

List the derogations demanded and comment on their justification.

No derogation demanded. However, SGRN would comment that it is not clear if the MS demands for derogation on the level of accuracy.

MS proposes to carry out a pilot study for providing all the effort variables. SGRN recognises the difficulty for all MS in collecting all the effort variables included in Appendix VIII. Notwithstanding, SGRN recognises that other MS use various sources (i.e. sampling strategy/census/questionnaire) for obtaining such data, and therefore SGRN cannot accept a

pilot study for collecting the effort variables. SGRN reminds to the MS that effort variables and their utility will be discussed during the next PGMed and RCMED&BS.

MS requests derogation for collecting the variables at level 5 instead of level 6 of Annex IV of the Decision; SGRN considers that such derogation cannot be accepted.

Section III.G - Research surveys at sea

France is asking for revision of the list of eligible surveys. See general comment on list of surveys. Concerning the Medias survey, SGRN notes that there is no correspondence on the name of the survey given by the MS and the one mentioned in Appendix IX of the Decision. MS should use the name of the survey as stated in Appendix IX of the Decision. Furthermore, the Number of transects planned should be included in Table III.G.1.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

France gives all information in tables IV.A.1 to IV.A.3. But it is not justified why there is « no sampling » on clam and other shellfish belonging to the bottom exploitation. To be clarified by MS.

MS gives sufficient information on data quality, sources and planned sampling methods.

France states: « Consequently, the production survey must first be adapted to be able to meet the requirements of this new Regulation (EC) No 762/2008 integrating the information to start the new phase of the aquaculture activity in the DCR, in which the population is segmented differently. France should make sure that the requirements of Comm. Dec. 2008/949 will be met. To be clarified by MS.

Derogations and non-conformities:

France will undertake a survey in 2009 to collect the number of enterprises. “In 2009 the survey will make it possible to: Confirm the list of enterprises entering the field of the DCR, know their main rearing techniques by species, a necessary operation in order for them be able to segment the reference population according to the breakdown in Table IV.A.1. The survey will also draw up the data on production sold by species (in terms of volume and value) and on employment, for each representative segment in the reference population for the year of activity 2008;” However, in another part of the text it says: “Data on production by volume have been collected since 1997 by exhaustive surveys by courier among enterprises.” For 2010 France asks for a pilot study on the collection of economic data in 2010 and will implement DCF afterwards. This all seems implausible, since the collection on economic data can already start in 2009 with the known enterprises, maybe without segmentation or stratification in the first place.

« In view of its low volume and the specific nature of the species and techniques, France is not collecting economic data in the overseas departments (DOM). “ This seems plausible.

The need to first put in place the exhaustive production survey in order to segment the reference population according to the DCR grid means that in 2009 France will only send data on sales (in terms of volume and value), employment and number of enterprises by size. Not plausible.

In 2010, the pilot project on collecting economic data will be limited to the main segments which make up aquaculture in France: 6 segments in fish farming in salt water, 2 segments in continental salmon fishing, 6 segments in oyster farming and mussel farming.

Why in 2010? Seems not plausible.

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Processing industry

France obviously relies on sea product processing industry. This limitation is not covered by the regulation. To be clarified by MS. It is mentioned: “The survey questionnaire is given in Annex I”, but there is none in Annex I. To be clarified by MS. In table IV.B.1 no segmentation is used, in table IV.B.2 all segments is mentioned in the last column. This is inconsistent. To be clarified by MS.

In table IV.B.1 sampling is said to be exhaustive for all parameters, which does not plausible correspond to the different given targets for covering rates. To be clarified by MS.

“Exceptional result” is mentioned as a variable which is not covered by the commission decision. To be clarified by MS.

Derogations

“Unsalaries work is not practised in the processing industries’ sector of activity. The variable “Cost of unsalaried personnel” will therefore not be evaluated.” This seems plausible

Section VII. – Follow-up of STECF recommendations

No, nothing is listed. Either France appears to assume that the previous STECF recommendations refer solely to the old regulation and are irrelevant to the new regulation or there has never been a STECF recommendation directed to France. MS should clarify.

Section VIII. - List of derogations

MS provides a list of derogations concerning the current yeat, with extensive information. MS is invited to use the format proposed in the SGRN 08-01 guidelines for presenting the list of derogations.

Section X. - Comments, suggestions and reflections

Comments indicate that the French proposal is an attempt to move towards full implementation of the new DCF rather than to an immediate full implementation – this will be common to many ms proposals and should be acknowledged as justifiable by SGRN. The proposal that is reviewed pre-dates the relevant RCM. The post-RCM proposal was only available in French and could not be reviewed.

ENDS

7.8. GERMANY

A) GENERAL COMMENTS:

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	MOSTLY	1, 3
Did NP have all the necessary Mandatory Standard Tables?	Yes	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	1, 2
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	3
Are there justified non-conformities associated with the NP?	?	
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	NO	
Are amendments required to the MS National Programme?	YES	2

1 Discard level for metiers which are not selected by ranking is not included in the NP. See General comments on Discard and landings sampling.

2 SGRN refers MS to the general comments

3 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging métiers but nevertheless the mergers that are proposed are sensible.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

Proposals for meetings under the 2010 programme were not reviewed because no official list was available when the NP was drawn up. Four proposed meetings in 2009 were not on the official list. MS needs to update this list.

Section III.B - Economic variables

It seems that not all the population is covered by NP in the standard tables. SGRN reminds MS that some economic parameters have to be collected for inactive fleets. See general comment on the coverage of population.

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. See general comment on the consistency of different data sources.

Section III.C - Biological - métier-related variables

A number of métiers will be sampled at one or a few trips only. It is unlikely that this will achieve required precision levels. A general observation (also applicable for almost all other countries) is that the obligation of dispersing sampling over too many qualifying métiers leads to a derogation of the quality rather than an improvement.

Derogations and non-conformities

Derogation is sought on the basis of national legislation issue that prevents sampling. SGRN does not consider this as a valid motive for granting the derogation. SGRN also refers MS to general comments on discard and landings sampling.

A general derogation is asked for sampling of most fleets below the minimum. SGRN comments that the proposed low sampling is not expected to yield in useful information except give indication on level of discards. SGRN recommends MS to seek coordination with

MS in the same area, fishing with similar metiers. Such co-ordination has to be agreed within the RCM.

Sampling of the shrimp fishery is made conditional to agreements and coordination with other MS. However, the resubmitted programme, does not mention these. It must therefore be assumed that this sampling will not be carried out.

OTB_DEF_<16_0_0 (Fishery directed on sandeel in the North Sea). This is a relative small catch. The reference to the Swedish catches is probably incorrect. This should be Denmark. The catch is probably also landed in Denmark.

OTB_MCD_70-89_0_0 (Mixed crustaceans and demersal fish): Will be sampled by Denmark by agreement. No derogation required

Germany applies for the following derogations with regard to metiers in the North East Atlantic:

OTB_DEF_>=120_0_0 (Fishery directed on redfish in ICES area V)
Reason: This fishery recently took only place in 2007 and disappeared again in 2008. Therefore, sampling might not be possible. Germany will sample this metier if it occurs again.

FPO_CRU_all_0_0 (Fishery directed on deep water crustaceans)
Reason: This fishery consists of two Spanish-owned but German-flagged vessels which are exclusively operating from Spanish and Irish ports. Fishing by landings and value is negligible. Long soaking times of the pots simulate high effort.

GNS_DEF_>=220_0_0 (Fishery directed on anglerfish and mixed species)
Reason: This fishery consists of four Spanish-owned but German-flagged vessels which are exclusively operating from Spanish and Irish ports. Fishing by landings and value is negligible. Long soaking times of the set nets simulate high effort.

OTM_DEF_>=120_0_0 (Fishery directed on redfish in ICES area XII, XIV)
This fishery disappeared in 2008. Germany will sample this metier if it occurs again.

SGRN recommends MS to seek coordination with MS in the same area, fishing with similar metiers. Such co-ordination has to be agreed within the RCM.

The derogation is required for sampling in the CECAF area and in the Pacific. SGRN does not consider that the derogation request is justified, because sampling in distant waters is a precise requirement. Germany is encouraged to establish bilateral agreement but, at the same time, shall submit anyway a sampling plan for these areas.

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Section III.D - Biological - Recreational fisheries

Derogations and non-conformities

SGRN consider that derogations for cod recreational fishers and salmon are justified in the view of very low level of catches. However, SGRN recommends MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational fisheries (WKSMRF) that will be held in Nantes, France in May 2009.

Section III.E - Biological - stock-related variables

Derogations and Non Conformities

MS seeks a derogation to sample *Pollachius virens* in the Skagerrak justified on the fact that the Skagerrak population is part of the North Sea stock which is already sampled by the MS. SGRN recommends MS to seek coordination with MS in the same area, fishing with similar metier. Such co-ordination has to be agreed within the RCM.

North East Atlantic and Western Channel: MS seeks derogations for sampling stocks that may be excluded following the exemption rules. In SGRN view, the exemption rules are not mandatory to use, and thus agrees with the approach taken by MS.

The derogation is required for sampling in the CECAF area and in the Pacific. SGRN does not consider that the derogation request is justified, because sampling in distant waters is a precise requirement. Germany is encouraged to establish bilateral agreement but, at the same time, shall submit anyway a sampling plan for these areas.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

A description of the sector is given with information on volume, number of enterprises and main species mostly referring to 2006. The description includes information about hhistory, human resources, farming systems distribution and characteristics, cultured species, socio-economic importance, the institutional framework, the governing regulations and trends, issues and development.

Derogations and non-conformities

Germany asks for a pilot study in aquaculture sector. This country participated in the pilot study on collection of economic data in aquaculture which has been performed in 2007-2009 by international consortium funded by EU. It is recommended to the MS to familiarise with the study and its results. The final report of the study should be available in 2009.

Processing industry

There is no explanation of the methods how the final estimations will be raised from the population. MS has to clarify this.

Section VIII. - List of derogations

The list contains both new and old derogation and SGRN considers it complete.

Section X. - Comments, suggestions and reflections

The MS points out inconsistencies within the guidelines and also within the commission decision which needs to be considered. Also reference is made to the need to merge economic data across supra-regions to protect the confidentiality in a specific case

ENDS

7.9. GREECE

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	MOSTLY	1, 2
Did NP have all the necessary Mandatory Standard Tables ?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	2
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	4, 6
Are there justified non-conformities associated with the NP?	MOSTLY	3
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	Yes	
Are amendments required to the MS National Programme?	MOSTLY	5

1 SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 Part of the guidelines was not followed in the manuscript and in some of the standard table of the NP.

2 The lack of information in some tables makes it difficult to evaluate the derogations requested.

4 SGRN considers that some derogation cannot be accepted unless justified information is provided.

5 The NP is in general in line with the DCF however minor adjustments have to be made according to the specific comments listed below

6 SGRN refers MS to the general comments.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

MS should update the Table II.B.1. Workshops aimed to standardize and to improve methodology (e.g. WKACM) should be attended by scientists of the MS.

Section III.B - Economic variables

Segmentation in table III.B.1 is not consistent with appendix III of the DCF (different naming of segments and aggregation of LOA classes).

Table III.B.3 is not consistent with the text. In particular, it is not clear if income, production and prices per species will be collected through questionnaires or through landing records delivered by vessel owners at the landing places.

Capital cost/value and employment should not be estimated using questionnaires but applying the common methodologies referred in the DCF. SGRN refers MS to the general comment on the Estimation of capital value.

The sampling strategy is described but further information should be given regarding methods to determine the sample size and to raise the final estimates to total population.

MS should indicate when the final data will be available.

No information is given on the calculation of the ecosystem indicator fuel efficiency. See general comment on the estimation of the ecosystem indicator “fuel efficiency”.

Section III.C - Biological - metier-related variables

MS must specify which parts of the populations have to be covered. The selection of the metiers should be better clarified.

SGRN notes that not all metiers are present in the standard tables, but just those picked up by the ranking system. MS should avoid excluding metiers from the ranking system, as SGRN may not assess their relative importance. A full Table III-C-1 should be resubmitted.

MS should give more details on the procedures of selecting metier.

MS should clarify how the small scale fishery has been included in the ranking system. The text does not describe precisely the output in the standard tables. The text describes that the small scale fishery has been considered as a unit segment in the previous data, this point has to be clarified. SGRN requires to MS more clarification on the sampling protocol.

MS should better clarify the sampling intensity at level of trips and the allocation of number of trips to be sampled per metier should be described in more details.

The planned minimum number of fish to be measured at a national level presented in table III.C.4 is incomplete; there are many empty cells in the table for a number of species. MS should complete the table. Time stratification is not clear; there may be errors in the numbers. MS should revise the table.

The methods used for assessing the quality of the data are not acceptable. Details of how quality will be assessed, is not clear. SGRN requests more details.

MS should describe how the minimum number of fish to be sampled was derived to achieve precision level and mention statistical details.

The national stratification is incomplete since not enough details on the small scale fishery are available, this cannot be determined completely. MS should provide more information concerning the stratification.

SGRN notes that no derogations are requested for some species of the Group 1 (table III.C.4, Group 2 (list the name of species) and Group 3. MS should justify derogation for all the species not mentioned in the sampling program but present in Group 1 and Group 2 of the Appendix VII of the Commission Decision 2008/949.

Before to accept derogation SGRN ask MS to clarify why eel pilot study has to be conducted. MS should provide this information.

Section III.D - Biological - Recreational fisheries

No information is provided on eel recreational fishery. MS should provide information, and relevant justification, if derogation for not sampling the eel recreational fishery is requested.

Section III.E - Biological - stock-related variables

SGRN notes that all the data presented in the table III.E.1 are not referred to national landing but at sub-division level (level 3 of Appendix 1 of Commission Decision 2008/949). MS should provide the data (landing, share in EU landing, average landing etc) for all the species at national level (level 1 according to the Appendix 1 of Commission Decision) aggregated for all areas where fishing vessel are operated.

SGRN notes that there is a discrepancy for *Boops boops* age between table III.E.2 and table III.E.3.

SGRN notes that MS provide the required number of fish to reach the precision target for some species without give any methodology and/or statistical evidence.

SGRN invites MS to provide both methodology and statistical evidence or to left blank the column in case no estimates have been performed.

SGRN notes that for all the species for which derogation is requested derogation cannot be granted on the basis of the table III.E.1 presented in the NP. SGRN recommend to MS to update the table with the correct values.

SGRN suggest to MS to formally list the species for which derogation is requested including a text and the explanation.

Pelagic sharks, *Sarda sarda* and *Istiophoridae* shall be sampled, even if on opportunistic basis. Sampling for bluefin tuna in cages shall include all the quantities caged in Greece or a mention to them. SGRN suggests including the minimum number of large pelagic species to be sampled to allow a better evaluation of the Greek NR.

Section III.F - Transversal variables

SGRN notes a series of inconsistencies between what is requested from the Regulation and the NP.

Concerning the capacity SGRN recommends the MS to clarify whether the information included in the FVR is adequate for allocating vessels to the fleet segments.

MS should provide more detailed information to evaluate the effort sampling plan (including statistical methodology, sampling size, information on the whole population, raising methods), and also on the quality issues.

Concerning landing MS should provide more detailed information on the sampling plan (including statistical methodology, sampling size, information on the whole population, raising methods), and also on the quality issues.

Section III.G - Research surveys at sea

MS should resubmitted the Medits map with the planned hauls

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

MS gives all information in tables IV.A.1. and table IV.A.3. In table IV.A.1 it remains unclear why some cells are filled in with brackets, some with an asterix, some bolt. MS is required to clarify this table.

No definitions of variables or methodology according to Commission Decision 2008/949 MS does not give information if employment is collected by gender. MS should clarify and provide the missing information.

Derogation

MS states: “No derogation is requested during the 1st (initial) year of the new DCR for aquaculture. A thorough 1st year analysis will lay the foundations for the subsequent years and the necessary amendments to be made.” So no comment on justification can be given now.

Processing industry

No information is given on definitions, methods of calculation or if employment is segmented by gender. MS should clarify this according to Comm. Dec. 2008/949.

Section VIII. - List of derogations

The list should be updated in case the MS wishes to request additional derogations in its 2009-2010 NP, e.g. sampling of eel recreational fishery.

ENDS

7.10. IRELAND

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines ?	YES	1
Did NP have all the necessary Mandatory Standard Tables ?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	
Is the general description of the Fisheries Comprehensive ?	YES	
Are there Derogations associated with the NP?	NO	
Are there justified non-conformities associated with the NP?	?	
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	NO	2
Are amendments required to the MS National Programme?	YES	3

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations.

3 SGRN refers MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. – Generalities

MS has all of its fishing activities in two regions, namely the North Sea and Eastern Arctic and the North East Atlantic. In general these sections are addressing the issues as outlined in the guidelines.

Section III.B - Economic variables

It is not clear if the inactive vessels will be sampled or they are excluded. SGRN refers MS to the general comment on the coverage of population.

Clustering of segments with less than 10 vessels is well reported in Table III.B.2, but the text does not explain the scientific evidence justifying these clusters, it is simply said that cluster is necessary for confidentiality reasons. SGRN refers MS to the general comment on clustering of segments.

Section III.C - Biological - metier-related variables

SGRN recommends MS to carry out the necessary analysis to ensure that self sampling does not provide biased estimates of the length frequencies from VIa and VIb OTB_DEF, as described in the workshop WKUFS.

SGRN acknowledges the effort done by MS regarding precision analysis of the historical data but requires more information about methods for quality assurance during the period 2009-10

The derogation asked for DRB_MOL can lead to a similar situation as the Tuna farming in the Mediterranean; a similar approach is promoted by SGRN. SGRN refers MS to the general comments on Tuna farming.

Section III.E - Biological - stock-related variables

SGRN endorses the MS approach given that statistical analysis supporting the rationale for the sampling effort planned is presented. In all cases the sampling effort planned is above the minimum required by the regulation.

Small quantities of large pelagics (8 species) have been reported to ICCAT in recent years. More relevant quantities of *Thunnus alalunga* have been also reported to ICCAT. Table III.E1 reports catches of 6 large pelagic species <200 t and 477 t of *Thunnus alalunga*, but no one of these species is included in table IIIC4 for the size sampling. All species under the ICCAT competence shall be monitored for task I (catches) and task II (size frequency), even if

occasionally caught and opportunistically sampled. SGRN recommends that table IIIC4 shall be amended accordingly for the species in group 1 and (for length only) group 2.

Section III.F - Transversal variables

The following effort based transversal variables cannot be provided from the logbook at the appropriate stratification level and units for all Irish vessels >10m: Number of rigs, Number of nets / Length, Number of hooks, Number of lines, Numbers of pots, traps and soaking time. This data are not collected routinely and are not mandatory for reporting in the logbooks. The only way these variables can be collected is by developing a sampling programme. Given the diversity of vessels and operations involved and the heterogeneity of activities in space and time the cost of such a programme would be prohibitive at this time. Therefore Ireland seeks derogation for these variables for vessels over 10m. A study is to be carried out for vessels under 10m under a national sentinel vessel programme.

SGRN notes that these variables are mandatory under the DCF and that the MS has to collect them on a routine basis. SGRN agrees with the approach taken by the MS for 2009 and notes that this issue should be further discussed within the RCM's. SGRN expects the outcomes of the feasibility study at the latest in the NP 2011-2013 for a full routine implementation.

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Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture

Sampling of some of the required segments has not been included and this is not properly justified in the text (it is simply said that segments with less than 5 enterprises will not be covered). MS is required to properly justify the exclusion of these segments from the sampling.

Stratification is consistent with the guidelines. Further information on the sampling strategy (determination of sample size and raising factors) could have been useful. MS should provide this information in the technical report.

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Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

MS does not provide any information about indicators 8 and 9. SGRN notes that these indicators are mandatory and MS must collect this information.

Section X. - Comments, suggestions and reflections

COMMENTS from MS

Inconsistencies in the regulation

Appendix VII of Commission Regulation 199/2008/EC lists the stocks for which biological samples are to be collected. Most entries in the table contain more than one ICES Division which might be separated by a comma, a forward slash or a separate row. Neither the Commission Regulation nor the SGRN guidelines offer guidance on the definition of stocks in the table. Previously, Divisions that are separated by commas were interpreted as being part of the one stock. Divisions that are separated by a forward slash or a separate row of the table are interpreted as belonging to separate stocks. It is unclear whether there is a difference between stocks that are separated by a slash and stocks that are separated by a separate row in the table.

It is also unclear how in Appendix VII the entry for herring in the North East Atlantic should be interpreted: VIa/VIaN/VIaS, VIIbc/VIIa/VIIj. Presumably VIa should not appear as one stock.

Precision levels

Although the required precision levels are specified in the regulation, it is unclear how the precision of an age or length composition should be defined as these are not estimates of a single number. The Irish interpretation of this is provided in Annex 3

ENDS

7.11. ITALY

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines ?	YES	1
Did NP have all the necessary Mandatory Standard Tables ?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	2
Is the general description of the Fisheries Comprehensive ?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	MOSTLY	3
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	5
Are amendments required to the MS National Programme?	MOSTLY	4

1- SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 - The lack of information in some tables makes it difficult to evaluate the derogations requested.

3 – SGRN considers that some derogation cannot be accepted; more information was requested to evaluate some others

4 – The NP is in general in line with the DCF however minor adjustments have to be made according to the specific comments listed below

5 - SGRN refers the MS to the general comments.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. – Generalities

SGRN was informed that a complete table of meetings which will be attended by Italian scientists has been submitted to EC. MS is requested to update the Table II.B.1

Section III.B - Economic variables

The inclusion of the required information on inactive vessels is not explicitly included in the text.

The method for raising the data is only stated for the transversal variables. To be clarified by MS.

The method of calculation of the imputed value of the unpaid labour is only explained for the processing industry but not for the fisheries or the aquaculture. SGRN refers MS to the general comment on estimation of inputted value of unpaid labour.

In table II.B.3, for some segments, the variable value of landings is not consistent with the data source (logbook). To be clarified by MS.

Section III.C - Biological - metier-related variables

SGRN notes that regarding the small scale fishery, all the different mesh sizes have been aggregated at level 5, this is not represented in the table III.C.1 and III.C.2. SGRN suggest either delete the sentence or give an explanation of what aggregation means.

In the NP fishing trip is described to be equivalent to one fishing day, but this is not the case for all metiers in certain GSAs. MS should better specify this aspect.

MS should specify in table III.C.3 how many numbers of trips for concurrent sampling at sea and at landing site are foreseen. These numbers should be separate for each metier.

In Table III.C.4 for *Anguilla anguilla* and large shark (*Selachi*), the planned minimum number of fish to be measured should be listed. SGRN suggest MS that if derogation is requested or a pilot study is being conducted this has to be specified also in this section.

In Table III.C.4 no information is given on the minimum number of fish necessary to achieve the precision target, this should be available from past sampling programs.

In Table III.C.4 no details are given for the year 2010. MS should add values also for 2010.

Concerning the International Coordination, activities to be carried out in cooperation with other European Mediterranean countries has been discussed in the past RCM Mediterranean and Black Sea, November 2008). No updates were given on the outcomes of the collaboration at the RCM, because the official draft of the RCM report has been received late.

The MISC segment should be included for all tuna and tuna-like species. The tuna purse seine vessel fishing in the Indian Ocean shall be included (if it is not hired to another Country) (amend or adjust the NP at point III.C.1 page 25 for the Indian Ocean purse seine fishing, point III.C.2 p. 23 for the MISC segment and tables III B 2, III C 1, III C 2, and III C 3).

Derogations

SGRN accepted the requested derogation for the following three metiers: Hand and Pole line for cephalopods; Pots and Traps both for demersal and mollusc gastropods. SGRN considers that the metiers targeting one species not listed in Appendix VII of the DCF and generating marginal by-catch and discards may be eligible for derogation once the evidence on marginal impact on by catch and discards are given.

SGRN accepted the derogation for discard sampling of the mentioned metier: GTR for demersal species; GNS for demersal species; PS for small pelagic species; LLS for demersal species. SGRN understands that these metiers are not known to generate large amounts of discards. However, the 10% criterion has to be assessed and RCM should evaluate, at a regional level, the scientific relevance of excluding these metiers from the discard sampling programme

SGRN cannot accept the derogation for discard sampling of metiers targeting large pelagic species because no statistical evidence that discards are negligible has been provided. SGRN refers MS to the general comments.

However, the derogation requested for discards in purse seine, long-line and tuna trap fisheries might be justified due to the very low proportion of discards. The derogation requested for discard sampling in the harpoon fishery is fully justified due to the well-known absence of discards.

Section III.D - Biological - Recreational fisheries

MS proposes a pilot study for 2009 to evaluate the eel recreational fishery (marine or inland); based on the results, the MS intends to set up a routine data collection programme. SGRN supports the conduction of a pilot study by the MS. SGRN recommend MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational fisheries (WKSMRF) that will be held in Nantes, France in May 2009.

Section III.E - Biological - stock-related variables

SGRN has been informed that under Table III.E.3 is reported the minimum number of fish to be measured at national level not for age but for length. SGRN recommend to MS to update the table with the correct number of samples to be aged.

In table III.E.1 the percentage in EU landing is empty this data should be provide. Sharing in EU T.A.C. for *T. thunnus* should be provided.

Derogations

SGRN notes that for all the species for which derogation is requested (except *D. labrax*) derogation cannot be properly evaluated because the share (%) in the EU landing is missing.

MS is requested to provide these data. SGRN suggest making available these data before to the next SGRN meeting so it can be evaluated. SGRN suggests MS to provide a cost/benefit analysis in detail to determine the excessive cost as mentioned in the NP proposal. This would require knowledge of the sample size precision level relationship that can only be generated by data collected on that specific variable.

Section III.F - Transversal variables

SGRN accepted the requested derogation concerning the effort variable “number of fishing operations” for purse seines.

MS requests derogation concerning the effort variable “Soaking time” for 2009, and proposes a feasibility study for investigating the best methodology to apply for estimating the variable. SGRN notes that these variables are mandatory under the DCF and the MS has to collect them on a routine basis. SGRN agrees with the approach taken by the MS in 2009 and notes that this issue should be further discussed with the RCM’s. SGRN expects the outcomes of the feasibility study, at the latest in the NP 2011-2013 for a full routine implementation.

SGRN recommends the MS to use conversion factors for all species that are not landed whole.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

For aquaculture, the sampling of some of the required segments has not been included (hatcheries of sea bass and sea bream, land based farms and cages of other marine fish, oyster long-lines) and this is not justified in the text with the exception of , only a mention for eel. Tables IV.A.1 and IV.A.2 are not consistent, concerning the “non sampling” segments. To be clarified by MS.

In the processing industry the method of calculating the capital value is not referred. SGRN refers MS to the general comment.

Section VI. - Module for management and use of the data

MS should clarify if data are provided to all relevant WGs.

ENDS

7.12. LATVIA

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	YES	1
Did NP have all the necessary Mandatory Standard Tables?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	2, 4
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	NO	
Are there justified non-conformities associated with the NP?	?	
Overall - Did the MS conform to Article 4 of 199/2008	YES	1
Overall – Did the MS conform to Article 5 of 199/2008	YES	1
Are RCM recommendations taken into account?	NO	3

Are amendments required to the MS National Programme?	YES	2
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- 1 The member state has made a significant effort to comply with the new regulation.
- 2 Discard level for metiers which are not selected by ranking is not included in the NP. See General comments on Discard and landings sampling.
- 3 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations in the NP.
- 4 SGRN refers MS to the general comments.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

It is seems that not all the population is covered by NP in the standard tables. SGRN reminds MS that some economic parameters have to be collected for inactive fleets. See general comment on the coverage of population.

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. See general comment on the consistency of different data sources.

Derogations and non-conformities

MS applied for derogation on collection of data of Imputed value of unpaid labour, value of physical capital: depreciated replacement value as there is time needed to change the statistical forms. SGRN remind that MS should follow the DCF and no transition period is foreseen for data collection according to DCF.

Section III.C - Biological - metier-related variables

See general comments on Ranking system, merging procedures and sample optimisation.
NOTE: LARGE PELAGICS: The Latvia fleet fishing for pelagic species in the CECAF area, listed on table III A 1 is not reported in any other table. MS to clarify this.

Derogations and non-conformities

See general comments on discard and landings sampling.

The derogation requested by Latvia for sampling in the CECAF area is not acceptable according to the obligation to carry out the data collection in all areas and particularly where there are fishing agreements with non-EU third countries. Furthermore, Latvia reports that sampling is carried out by local observers and, in this case, data shall be included in the NR.

Eventually, a bilateral agreement should be included by Latvia to overcome the need to obtain data from the fleet active in the CECAF area.

Section III.D - Biological - Recreational fisheries

SGRN is not able to assess the quality of the sampling scheme before the results of the ICES workshop (WKSMRF) will be available.

Derogations and non-conformities

SGRN consider that derogation for cod is justified due to very low catches ($< 0.1\%$ of the national catches).

Section III.E - Biological - stock-related variables

Table IIIE1 reports catches of 550 t of *Sarda sarda* (not reported to ICCAT), but this species is not included in table IIIC4 for the size sampling. Relevant quantities of *Thunnus albacares* (334 t) have been also reported to ICCAT in 2006. All species under the ICCAT competence shall be monitored for task I (catches) and task II (size frequency), even if occasionally caught and opportunistically sampled. SGRN recommends that table IIIC4 shall be amended accordingly. NOTE: LARGE PELAGICS: The pelagic species caught by the Latvia fleet fishing in the CECAF area are not included in the species to be sampled. To be amended.

Derogations and non-conformities

There is no request by WGBAST for collecting information on number of ascending salmon individuals in Latvian rivers. SGRN considers that MS is not required to ask for derogation.

The derogation requested by Latvia for sampling in the CECAF area is not acceptable according to the obligation to carry out the data collection in all areas and particularly where there are fishing agreements with non-EU third countries. Furthermore, Latvia reports that sampling is carried out by local observers and, in this case, data shall be included in the NR. Eventually, a bilateral agreement should be included by Latvia to overcome the need to obtain data from the fleet active in the CECAF area.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

A description of the sector is given with information on volume, value, number of enterprises and main species referring to 2007. The collection of data is not planned due to no marine aquaculture.

Processing industry

Derogations and non-conformities

MS applied for derogation on collection of data of Imputed value of unpaid labour as there is time needed to change the statistical forms. SGRN remind MS that it should follow the DCF and that no transition period is foreseen for data collection in fish processing

Section VIII. - List of derogations

The list of derogations is only for the current year.

ENDS

7.13. LITHUNIA

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	MOSTLY	1, 2
Did NP have all the necessary Mandatory Standard Tables?	Yes	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	1, 3
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	5
Are there justified non-conformities associated with the NP?	?	
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	NO	4
Are amendments required to the MS National Programme?	YES	1

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 Table III.E1 is not in line with guidelines.

3 Discard level for metiers which are not selected by ranking is not included in the NP.

4 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations in the NP.

5 SGRN refers MS to the general comments.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

The program is well presented and it contains clear explanations of the sampling strategy and raising factors.

However, Lithuania will use different data sources for the collection of economic data and no text is provided on the consistency of them. See general comment on the consistency of different data sources.

MS should justify the clustering of segments reported in table III.B.2. See general comment on clustering of segments.

Regarding the estimation of capital value and capital costs, MS proposes to carry out a pilot study. However, SGRN reminds that an European study has been already carried out and invites MS to apply the results of this study to estimate the capital value of the fleet. See general comment on the Estimation of capital value and capital costs.

Lithuania will collect economic data from vessels fishing in “other regions”, but considering that there are only 5 companies, they state that data will not be delivered due to confidentiality problems. MS is asked to clarify this point so that the Commission could accept or reject this request.

Section III.C - Biological - metier-related variables

Vessels <10 m are not mentioned in the NP.

No protocols are provided. Missing information should be provided by MS.

Method for merging metiers looks reasonable but no scientific evidence is presented. MS should consider generic comment on mergers.

NOTE: NOT LARGE PELAGICS: The Lithuanian fleet fishing for pelagic species (possibly catching also large pelagics as a by-catch) in the Pacific Ocean, listed on table III A 1 is not reported in any other table. To be amended.

Derogations and non-conformities

MS should consider general comments on discard and landings sampling.

There are no derogations requested yet. However, Lithuania looks forward to cooperation with other MS in data collection in *CECAF FAO 34*. For Lithuania, sampling in this area is complicated due to absence of experts. The state of fishery, possibilities to send observers on board and agreements with other member states on sampling strategy and methodology should be evaluated by the Commission. SGRN recommends the MS to present an action plan regarding the inclusion of this fleet in the MS sampling programme. MS should consider the general comment on long distance fisheries.

No derogation is required for sampling in the CECAF area or in the Pacific. As concerns the CECAF area, the Lithuanian NP reports that the sampling strategy is still to be decided and that a bilateral agreement might be necessary. SGRN recommends to clarify the situation in CECAF and to explain the lack of information for the Pacific pelagic fleet.

Section III.D - Biological - Recreational fisheries

MS has not mentioned eel recreational fishery and the salmon recreational fishery is poorly described. Possible volume of cod catches in recreational fishery has not been estimated. MS does not foresee how catches of recreational fisheries will be dealt in the future. SGRN recommends MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational fisheries (WKSMRF) that will be held in Nantes, France in May 2009.

Section III.E - Biological - stock-related variables

Table III.E1 is not in line with guidelines and includes only species which have landings. Sampling plan is specified with precision objective except for cod.

The agreement between Lithuania, Spain and Portugal should be the object of formal bilateral agreements annexed to the three NP proposals in the future.

Table III.E1 does not include tuna or tuna-like species in the CECAF area and no species for the Pacific Ocean. Relevant quantities of *Sarda sarda*, *Scomberomorus tritor* and Mix tunas have been reported to ICCAT in the past. All species under the ICCAT competence shall be monitored for task I (catches) and task II (size frequency), even if occasionally caught and opportunistically sampled. SGRN recommends that table IIIC4 shall be amended accordingly, including also the Pacific species. NOTE: LARGE PELAGICS: The Lithuanian fleet fishing for pelagic species (possibly catching also large pelagics as a by-catch) in the Pacific Ocean, listed on table III A 1 is not reported in any other table. To be amended.

No derogation is required for sampling in the CECAF area or in the Pacific. As concerns the CECAF area, the Lithuanian NP reports that the sampling strategy is still to be decided and that a bilateral agreement might be necessary. SGRN recommends to clarify the situation in CECAF and to explain the lack of information for the Pacific pelagic fleet.

Section III.F - Transversal variables

Derogations and non-conformities

MS asked for derogation about “Number of rigs”, “Numbers of pots and traps”. SGRN recognise that according to latest RCM, the upcoming revision of the logbook regulation should assure that all effort variables in Appendix VIII of the Commission Decision 2008/949/EC can be derived from logbooks. Also, MS explains that for the national fishery the parameters “Number of rigs”, “Numbers of pots and traps” are not relevant. SGRN recommends MS to investigate other means for the collection of this information. SGRN notes that these variables are mandatory under the DCF and that MS has to collect them on a routine basis.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

A description of the sector is given with information on volume, value and main species referring to 2007. Lithuania gives sufficient information in table IV.A.1 but the table should be filled in according the guidelines with « yes », « no » or « NS » in each cell. As Lithuanian aquaculture sector only consists of fresh water species and data collection is therefore not mandatory. So Lithuania decided and no more information is provided even not in the tables. No derogations are mentioned.

Processing industry

MS gives necessary information on data quality, methodology and definition of variables. A stratified sampling strategy is used. Lithuania may think about covering the segment with the most employees with the lowest planned sample rate. This should be based on economic evidence. Lithuania may give information about the relevance of the different enterprise segments in economic terms and rethink its sampling strategy. No derogations are mentioned.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

It is not clear whether VMS data will be collected by MS. This needs to be explained by MS.

ENDS

7.14. MALTA

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines ?	YES	1, 4
Did NP have all the necessary Mandatory Standard Tables ?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	YES	4
Is the general description of the Fisheries Comprehensive ?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	MOSTLY	2
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	
Are amendments required to the MS National Programme?	PARTLY	3

1 SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 SGRN considers that more information should be supplied in order to evaluate some non-conformity

3 The NP is in general in line with the DCF however minor adjustments have to be made according to the specific comments listed below.

4 SGRN refers MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. SGRN refers MS to the general comment on the consistency of different data sources.

The sampling protocol is well described, in particular the allocation of vessels within segments. But further information should be given regarding the methods used to determine the sample size and to raise the final estimates to total population.

The Maltese programme will cover all the variables required by the regulation but some of them are not well defined (in particular total fixed cost that should not include capital values and investment that should consider only improvements to existing vessel/gear during the given year). MS should refer to appendix VI of the DCF where variables are described.

Capital value/cost and employment should be evaluated according to the methodologies of the European studies carried out in 2007, as reported in appendix VI of the DCF. SGRN refers MS to the general comments on the Estimation of capital value and capital costs and On the Estimation of employment.

Section III.C - Biological - metier-related variables

SGRN notes that not all metiers are present in the standard table (III.C.1), but just those picked up by the ranking system. All the metiers should be added and the ones selected for sampling clearly evidenced.

In table III.C.3, MS should clarify the planned number of trips for discards if no derogation is requested.

SGRN notes that no discard sampling are present for “LLS demersal fish” and for “LLD for pelagic species”. Table III.C.3 should be revised or derogation must be requested. In this case statistical evidence that discards are negligible should be provided.

MS should revise the “Required precision target” in table III.C.4 in line with Regulation.

In table III.C.4 the column with the number of fish necessary to achieve the precision target should be blank for species for which precision level was not calculated.

SGRN notes that the minimum required should be respected if there is a precision target, otherwise there is no minimum level.

SGRN notes that the number of *Thunnus thynnus* to be sampled refers only to the long-line fishery, although an indication is given in the text, there are no details on the numbers to be sampled from the BFT farms. MS should clarify this point.

SGRN notes that to coordinate the sampling programme with countries of the same marine region, issue of *Thunnus thynnus* sampling has to be addressed. Bilateral agreements should be conducted between the concerned member states. Responsibility and intensity of sampling *Thunnus thynnus* should be clarified.

SGRN suggest to MS to add the methodological details that will be addressed by the next PGMed and RCM Mediterranean and Black Sea.

Section III.D - Biological - Recreational fisheries

SGRN notes that no information is provided on the recreational fishery of eel. Derogation should be requested, with the relevant justification, if no sampling is proposed.

Section III.E - Biological - stock-related variables

Required precision target in table III.E.3 should be in line with regulation (i.e. CV 2.5% for stock that can be aged or 12,5 for stock that cannot be aged). In the same table III.E.3 MS should provide the actual number to be sample for age instead of the formula. MS should mention for age only the species that propose to sample.

In the table III.E.3 column with number of fish to achieve the precision target should be blank with the exception for the species where data have been collected previous years and precision has been estimated.

Table III.E.2 should be updated following the above recommendation on age reading.

SGRN notes that MS propose to sample sex, weight and maturity for large pelagic every year. SGRN appreciated the initiative but request to MS, before to carried out the sampling scheme, to find out an agreement at Regional level (RCM Med and Black sea) or sample by the Regulation (every three years).

SGRN accepted other non-conformities.

Section III.G - Research surveys at sea

In Table III.G.1, concerning MEDITS, MS should provide the maximum days eligible according to the Commission Decision 2008/949.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture Industry

In the NP Malta mentions “ since the total number of aquaculture operations is only six enterprises” – this does not correspond to the information in Table IV.A.2. MS should clarify this.

Malta gives information on data sources and definitions. But investment should be collected on a net basis and it should not include the whole research and development costs. Comm. Dec. 2008/949 clearly refers to assets. MS should clarify. Some parameters are not mentioned in the Comm. Dec. 2008/949, like the financial position. But if Malta wants to collect this data SGRN appreciates this. Some parameters are missing, e.g. extraordinary costs and imputed value of unpaid labour. MS should revise this section and the collection of the parameters must be according to Comm. Dec. 2008/949.

Processing industry

MS gives sufficient information in tables IV.B.1 and IV.B.2.

MS plans a census, SGRN appreciates this. Information on data quality is sufficient.

Concerning variable definition, there are some inconsistencies in the list of variables to be estimated (see comments on aquaculture industry). MS should revise this section of the NP according to Comm. Dec. 2008/949.

Section VII. – Follow-up of STECF recommendations

MS states that no STECF recommendations are relevant to the Maltese NP. However, SGRN notes that there are some general comments-recommendations also relevant to Malta. MS should follow-up these STEFC recommendations.

Section VIII. - List of derogations

SGRN notes that the list should also include derogations requested by MS in the past (e.g. discard sampling for some metiers).

ENDS

7.15. NETHERLANDS

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines ?	MOSTLY	1, 2
Did NP have all the necessary Mandatory Standard Tables ?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	4
Is the general description of the Fisheries Comprehensive ?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	2
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	NO	3
Are amendments required to the MS National Programme?	YES	2

1 SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

3 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations

4 SGRN refers MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

It acknowledges the significant changes in legislation and indicates that planning has taken place in the light. This is a pre-rcm proposal. No post-rcm proposal was available.

Section III.B - Economic variables

The program is very well explained and it contains the relevant information required by the guidelines. However, the text does not explain the methodology that will be used to estimate the ecosystem indicator “fuel efficiency”. See general comment.

The MS should also explain an inconsistency of the text with table III.A.1. From this table, there are two “other regions” where Dutch vessels operate (Central East Atlantic and Pacific Ocean), while in the text it is written that only one large pelagic vessels spent

the majority of its time at sea outside the supra region of ICES and NAFO areas (in African waters).

Section III.C - Biological - metier-related variables

Derogations and non-conformities

Métier	Fishing ground	reason		ARGUMENT JUSTIFIED?
LHP SPF 000	IV, VIIId	only selected by effort, the selection is not valid since the effort unit (days of angling) is not comparable with other effort units in this area		YES
TBB DEM 080	IIIa	MS is not able to set up a sampling scheme targeted to this area. The choice of fishing in this area is often made on opportunistic arguments		SEEK COOPERATION WITH DENMARK
TBB DEM 100	IIIa	less <15 effort days		YES
GNS DEM 000	IV, VIIId	only selected by effort, the selection is not valid since the effort unit is not comparable with other effort units in this area		YES
SCC DEM 000	IV, VIIId	probably not a homogeneous métier; mixture of various fishing gears reported as Scottish seine		YES

MS creates métiers based on a different procedure than the one supported by the DCF. Although the procedure looks reasonable, it has a major flaw by not taking into account the mesh size of the gears used and the targeted assemblage. Moreover, moving the ranking system from métier level 6 to level 4 provides a different answer in terms of métiers selected. SGRN recommends the MS to present scientific evidence that the approach taken does not differ from the métiers required from the DCF and that the data will be compatible at the regional level.

Method for merging métiers looks reasonable but no scientific evidence is presented. MS should refer to the generic comment on mergers.

Derogation asked for not sampling métiers DRB_MOL_0_0_0, SSC_DEM_0_0_0 and GNS_DEM_0_0_0 does not follow the exemption rules. However, SGRN considers that the low activity carried out on these métiers justifies the derogation, once that the costs of sampling would be paramount. SGRN recommends MS to seek coordination with MS in the same area, fishing with similar métier. Such coordination has to be agreed within RCM

MS asks for a derogation regarding sampling the fleet operating in the CECAF area for both métier and stock related variables. SGRN recognizes the difficulty in sampling this fleet but

call the attention of the MS that derogation has been asked several times in the past and until now no progress has been shown regarding sorting out the problem. SGRN recommends the MS to present an action plan regarding the inclusion of this fleet in the MS sampling programme. See general comment on long distance fisheries.

Section III.D - Biological - Recreational fisheries

Derogations and non-conformities

Derogations in 2009 for eel and cod with the justification pending advice on methodology it will be included in 2010. SGRN recommends MS to follow the provisions of the DCF.

Section III.E - Biological - stock-related variables

Derogations and Non Conformities

MS ask for derogation for sampling stocks in the Skagerrak. There is indication of the amount of catch in the SD and only difficulties to access the catches is given as explanation. If catches is significant bilateral arrangement with DEN or SWE should be made. SGRN requires more information in order to do a proper evaluation on the derogation requested.

Section III.F - Transversal variables

Derogations and non-conformities

Derogation is demanded for the following variable for vessels smaller than 15m.:

- Number of rigs
- Number of nets/length
- Numbers of hooks, number of lines
- Number of pots, traps
- Soaking time

SGRN notes that these variables are mandatory under the DCF and that the MS has to collect them on a routine basis. SGRN recommends MS to investigate other means for the collection of this information.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

The Netherlands give a description of the sector which mentions production volume, value, number of enterprises and employees for the year 2005. Concerning the main sectors it provides data for 2006. Since the whole sector is developing very fast, pilots are not included in the sampling strategy, which seems plausible especially in terms of cost. So the data collection is restricted to Mussel culture, Oyster culture, Eel culture, Catfish culture, Trout culture, Tilapia culture. Especially concerning trout this is not reflected in table IV.A.1 where « No » resp. « NS » for trout is stated. MS should clarify this issue.

The Netherlands do not give any definition of variables/ or description of methods. Even not where it is necessary concerning the Commission Dec. 2008/949, e.g for the variables unpaid labor and capital costs. The Netherlands do not give information whether they collect employment data by gender. It seems unplausible to find this in companies financial accounts, as it is stated : » All economic variables stated in the regulation can be obtained from the financial accounts of the firms calculation » and especially not when looking at the processing industry where they ask for derogation.

Under the header derogation The Netherlands states, « The collection of the data in the Dutch fishing fleet, described above, allows fully complying with the requirements of the regulation. Only one small scale long line mussel company is not taken into consideration in the data collection. » It shall be a collection in the aquaculture sector, not in the fleet. If there is only one small enterprise in a segment, exclusion seems plausible.

Processing industry

Derogation

The Netherlands ask for derogation to deliver data on employment by gender and on subsidies, due to non availability of data from secondary sources. It is not clear, why they can not do a sampling concerning this variable and it is not clear why The Netherlands can not provide data on subsidies, as public money spent should be recorded somewhere in a states accounting system, especially in the European Union where subsidies must normally be allowed by the European Commission. SGRN asks MS to clarify this point.

Section VII. – Follow-up of STECF recommendations

A list of SGRN recommendations from 2008 is presented along with follow-up plans. Earlier recommendations are not addressed but this may be because they are not considered relevant to the new DCF.

Section VIII. - List of derogations

The list appears to be the current year.

Section X. - Comments, suggestions and reflections

The Netherlands proposal draws attention to the wide-scale changes that are needed under the new DCF and the very short time available to undertake logistical planning for them. It also highlights a number of deficiencies under the Commission regulation that should be considered and also draws attention to problems associated with the financial forms (concerning both technical and structural problems) and difficulties in providing project costs at the resolution required by the Commission.

ENDS

7.16. POLAND

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	Mostly	1
Did NP have all the necessary Mandatory Standard Tables?	Yes	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	Mostly	1, 3
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	NO	2

Are amendments required to the MS National Programme?	YES	1
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1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations in the NP.

3 SGRN refers MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

The ranking has been done only using landing and effort but neglecting value. MS gave an explanation for this but SGRN consider that this is not conforming to the new DCF.

Section III.B - Economic variables

Poland is going to use different data sources for the collection of economic data, but no text is provided on the consistency of them. See general comment on the consistency of different data sources.

MS should justify the clustering of segments reported in table III.B.2. See general comment on clustering of segments.

Derogations and non-conformities

MS asks for derogation regarding publishing of data for deep-sea vessels as there are only 3-4 vessels in the segment. The derogation is acceptable and clear. SGRN suggests that MS should participate in the RCM other regions which will discuss the problems of deep-sea fishery

Section III.C - Biological - metier-related variables

The ranking has been done only using landing and effort but neglecting value. MS gave an explanation for this but SGRN consider that this is not conforming to the new DCF.

The MS has used gear descriptions not in the list, namely TBS for crustaceans. To be clarified by MS.

The table III_C_2 is confusing. The metiers merged seem to be the same; however text says they are merging NA and NAFO metier as stock fished is the same. No statistical evidence provided. Mergers across fishing grounds must be discussed during RCM.

MS have ranked their metiers to level 5. Moving the ranking system from métier level 6 to level 5 provides a different answer in terms of métiers selected. SGRN recommends the MS to present scientific evidence that the approach taken does not differ from the metiers required from the DCF and that the data will be compatible at the regional level

Derogations and non-conformities

The requested derogations for sampling are based on 200 tonnes rule that is not applicable for sampling metiers. See General comments on discard and landings sampling.

A derogation is demanded for sampling TBS_CRU_ \geq 40_0_0. SGRN requires more information in order to do a proper evaluation on the derogation requested.

Section III.D - Biological - Recreational fisheries

SGRN recommends MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational fisheries (WKSMTF) that will be held in Nantes, France in May 2009.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

No information about the methods how MS is going to raise the final estimates is provided in NP. MS has to follow the guidelines and provide this information to the Commission.

It is required by DCF (Appendix X) to explain the methods of calculation of imputed value of unpaid labour. MS has to provide the missing information.

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Processing industry

No information about the methods how MS is going to raise the final estimates is provided in NP.

MS should use common names of variables listed in the Appendix XII of the Commission decision. Missing parameter (number of enterprise), personnel costs are not divided. No information about estimation of calculation of imputed value of unpaid labour. See also general comment **on the calculation of imputed value of unpaid labour**.

Section VIII. - List of derogations

The list contains only new derogations.

ENDS

7.17. PORTUGAL

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	YES	1
Did NP have all the necessary Mandatory Standard Tables?	MOSTLY	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	4, 5
Is the general description of the Fisheries Comprehensive?	MOSTLY	
Are there Derogations associated with the NP?	YES	3
Are there justified non-conformities associated with the NP?	NO	
Overall - Did the MS conform to Article 4 of 199/2008	MOSTLY	

Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	2
Are amendments required to the MS National Programme?	YES	

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations in the NP.

3 SGRN refer MS to the general comments

4 Table III_F_3 is missing.

5 Indian Ocean is missing

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

SGRN acknowledges the effort made by MS to adjust its NP to the new DCF. For regional coordination there is only a forward reference to the ‘relevant’ sections in the national proposal and no summary provided. MS should clarify. In section I, no specific mention in the text regarding the impact of the DCF on the MS NP. The Indian Ocean region is missing in the section on description of the fishing sector. Missing information to be provided by MS.

Section III.B - Economic variables

Treatment of data on income from leasing out quota or other fishing rights is ambiguous. MS should clarify if this information cannot be collected or it is simply not present.

Clustering of segments is clearly reported, but for each clustering, the scientific evidence justifying it should be explained in the text. SGRN refers MS to the general comment On clustering of segments.

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. SGRN refers MS to the general comment On the consistency of different data sources.

Even if the sampling strategy covers 100%, a better explanation of the expected success of the census based on past experience should be included. The comment “we could not get all the answers” is not very informative, and in fact this could introduce a bias as there is no information on the firms that did not answer

Derogation on financial position of small scale fisheries is demanded, but it is not sufficiently justified. SGRN reminds that all variables listed in appendix VI should be collected using appropriate methodologies.

Derogation is asked for FTE calculations justified by a feasibility study planned for 2009 to collect data of working time in hours. SGRN reminds MS that a European study has already been carried out and invites MS to apply the results of this study. SGRN recommends MS to comply with the requirements of the DCF.

MS should indicate when the final data will be available. SGRN refers MS to the general comments on the availability of final estimates.

Section III.C - Biological - metier-related variables

MS has omitted the data from Indian Ocean Fishery. See previous comment in section I.

MS has omitted the full list of metiers that are not included in the 90% of the ranking system, SGRN cannot evaluate whether there is justification for omitting these metiers. All metiers where trips have been allocated should be given in table III_C_1. One metier was picked up outside of the ranking system and the reason given. MS to resubmit a full table III_C_1.

MS is reminded to follow strictly the naming convention and fishing grounds delimitation as proposed by the RCM NA in 2008, in future proposals and technical reports. See also general comments on table III_C_2.

Reference is made to 2 métiers not listed in Appendix IV, namely LLD_DWF_0_0_0 and MISC_MOL_0_0_0. SGRN agrees with the use of these codes as LLD_DWF_0_0_0 already exists in the North Atlantic region and MISC_MOL_0_0_0 referring to diving activity, has marginal landings and values.

MS has merged two metiers OTB-CRU, however they target two completely different fisheries, Shrimp and Nephrops. Moreover, only 12 trips are planned for discards, which may be insufficient in terms of precision and coverage. More scientific support should be brought to support this merger.

The MS provides very basic protocols for sampling discards described. Not enough details. SGRN is aware of the availability of a website. The linkage to the relevant webpages related to protocols should be given in future NP proposals

Some of the métiers have the number of trips below the minimum requirement however these are justified in the case of the length of the trip in the NAFO region and the seasonality of the fishery in the case of large pelagics.

No information given on the data quality for the mainland fisheries. No indication whether national métiers are used. This information is supplied for Azores. Missing information to be provided by MS. RCM NEA 2007 recommended a case study for analyzing jointly the spatial distribution of Portuguese and Spanish discard sampling in IXa and its presentation for discussion in the 2008 RCM NA. The RCM NA 2008 report states that there is no further scopes for task sharing as the fisheries do not overlap. SGRN encourages the two countries to continue seeking for coordination in other fields. A pilot study has been submitted for the collection of data on eels in marine waters. SGRN expects to see the outcomes of this pilot study together with the NP proposal 2011-2013.

No specific derogation is demanded but SGRN found the following non conformities:

No discard sampling for LLS_DEF in ICES division IXa

No discard sampling for PS_SPF in ICES area X

SGRN recommends MS to implement a sampling programme or bring all supportive information for not sampling the métiers cited above.

Section III.D - Biological - Recreational fisheries

The MS states that it does not have a recreational fishery for the species listed. However, In the RCM NA report it mentions a derogation pending for sea bass. To be clarified by MS.

In Section III.D. of the NP, Portugal reports that there is no recreational fishery for bluefin tuna in any of the regions taken into account. SGRN, according to the available information (www.azoresmarlin.com/x-species.html and www.portugal-sport-and-adventure.com/fishing-portugal.html) supposes that sport and recreational tuna fishing activity does exists in Portugal (mainland, Azores and Madeira), that the derogation is not justified and then recommends that a pilot study shall be conducted and describe the current situation.

Section III.E - Biological - stock-related variables

The collection of stock-related variables is missing maturity data on *Sebastes mentella* and *Gadus morhua* in Area I/II due to on board operations, further clarification is required.

No sampling protocols are presented. SGRN is aware of the availability of a website. The linkage to the relevant WebPages related to protocols should be given in future NP proposals

No methods for assessing the quality of the data are presented. Information to be provided by MS.

There is no need to ask for derogation for stocks that fall under the exemption rules. Have asked for a derogation to sample some stocks of national importance. As long as these stocks are listed in the Appendix VII of the DCF, SGRN agrees with the approach taken by MS.

The derogation indicated in table III E1 for *Thunnus thynnus*, based on the 0 catch level cannot be accepted because some catches are reported to ICCAT.

Section III.F Transversal variables

MS to provide conversion factors used for all species.

Section III.G - Research surveys at sea

Data storage is not mentioned for FGCS and data storage and maps are not mentioned for MEGS. SGRN recommends MS to provide complete information in the adjustment of NP 2010 and clarifies the exact collection of ecosystem indicators.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture

Table IV A 1 does not comply with the guidelines. MS is required to update this table.

Table IV A 2 (segmentation and sample plane) is missing. MS is required to provide this table.

Even if the sampling strategy covers 100%, a better explanation of the expected success of the census based on past experience should be included. The comment “we could not get all the answers” is not very informative, and in fact this could introduce a bias as there is no information on the firms that did not answer.

Many derogations are demanded for the aquaculture data in table IV A 3 and this is explained in the text, but some of them are not sufficiently justified. However, it is questionable whether the demand for such a general derogation can be justified only on the basis of a change in the regulation. For example some of this data is public and should therefore be available, as is the case of subsidies. SGRN recommends MS to comply with the requirements of the DCF.

The raising procedure is not detailed in the text.

MS should indicate when the final data will be available.

Processing sector

The raising procedure is not detailed in the text. MS to clarify. MS should indicate when the final data will be available. SGRN refers MS to the general comment On the availability of final estimates.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

MS has asked for derogation for analysing the VMS data in 2009 as it is in the process of developing a computing tool. The analysis will be ready by 2010. Data is also collected on a 2 hour period therefore level of precision will not be achieved. SGRN requires more information in order to do a proper evaluation on the derogation requested.

The section on calculation of discards rates per metiers is missing. Information to be provided by MS.

Section VII. – Follow-up of STECF recommendations

STECF recommendations from previous years that might be applicable to MS are absent in the NP proposal. Information to be provided by MS.

Section VIII. - List of derogations

The list of derogations only applies for the current year. Complete information back in time to be provided by MS.

ENDS

7.18. ROMANIA

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	PARTLY	1, 2
Did NP have all the necessary Mandatory Standard Tables?	MOSTLY	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	PARTLY	3
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	MOSTLY	4
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	
Are amendments required to the MS National Programme?	PARTLY	5

1 SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 Part of the guidelines was not followed in the manuscript and in some of the standard tables of the NP.

3 The lack of information in some tables makes it difficult to evaluate the derogations requested.

4 SGRN considers that some derogation cannot be accepted; more information were requested to evaluate some others

5 The NP is in general in line with the DCF however minor adjustments have to be made according to the specific comments listed below.

6 SGRN refers MS to the general comments.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

The segmentation of the fleet is in accordance with the DCF. However, the scientific evidence justifying the clustering of segments should be explained in the text. SGRN refers MS to the general comment on the clustering of segments.

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. See general comment on the consistency of different data sources.

Capital value/costs and employment should be estimated according to the methodologies of the studies indicated in the DCF. See general comments on the Estimation of capital value and capital costs and on the Estimation of employment.

The sampling strategy is described but further information should be given regarding methods to be used to determine the sample size and to raise the final estimates to total population.

Table III.B.3 should report the complete list of all economic variables according to appendix VI of the DCR.

MS should indicate when the final data will be available.

No information is given on the calculation of the ecosystem indicator fuel efficiency. See general comment on the estimation of the ecosystem indicator “fuel efficiency”.

Section III.C - Biological - metier-related variables

MS should clarify which data sources are used for small scale < 10m and large vessels. This cannot be determined from the text.

SGRN notes that not all metiers are present in the standard table (III.C.1), but just those picked up by the ranking system. All the metiers should be added and the ones selected for sampling clearly evidenced. MS should revise the table.

The data used for the ranking system (effort, landings, value) should be described in the text (from all the population or part of the population) not only in the table. Data on value should be used in the ranking system or give an explanation why this was not the case.

In table III.C.1, data for the metier “LHM_MPD_0_0_0 mixed pelagic and demersal species” should be given. MS should clarify why this metier has been chosen, since the data are not available.

SGRN ask to MS to provide statistical evidence that prove the similar exploitation pattern should be given for merged metiers (table III.C.2).

SGRN notes that the metier LHM_MPD_0_0_0 was selected by the ranking system but no sampling plan is evidenced in table IIIC3. MS should provide additional information.

MS should clarify what is sampling at “the fishery point” for metier FPN_FIF_14_0_0. If MS consider it not as sampling at sea, at sea discards sampling should be conducted. MS should provide additional information.

In the table III.C.4 the column with the number of fish necessary to achieve the precision target should be blank for species for which precision level was not calculated, unless statistical analysis was conducted to estimate the minimum no of fish. MS should revise the table.

Required precision target in table III.C.4 should be in line with regulation. MS should revise the table.

Concerning the initiatives taken to coordinate the sampling programme with countries of the same marine region a bilateral agreements should be sought with Bulgaria.

MS should explain why *Trachurus trachurus* is not present in the sampling program. A formal derogation for *Trachurus trachurus* should be requested if this species is not going to be sampled.

Section III.D - Biological - Recreational fisheries

MS states that there is not eel fishery in the area; therefore no sampling recreational fishery is planned. MS should explicit request derogation under the Derogation and non Conformities Section. SGRN consider that such derogation would be justified.

Section III.E - Biological - stock-related variables

Table III.E.1 should also include information on *Trachurus trachurus*, as it is included in the list of species of Appendix VII concerning the Black Sea. Text and Tables III.E.1, III.E.2 and III.E.3 are inconsistent; MS should clarify the parameters that will be collected on an annual and triennial basis, as well as the years for which sampling will be conducted.

Although no sampling for sexual maturity is planned for *Squalus acanthias*, MS does not request derogation; MS should request derogation, providing relevant justification.

MS provides in Table III.E.3 the number of fish to achieve the precision target, for most of the species. Documentation or reference should be made on the methods and results from the precision analysis made.

It is likely that pelagic trawlers could catch also tuna-like species (i.e.: *Sarda sarda*) which are reported in other pelagic fishery in the Black Sea. It should be relevant to provide a complete overview of the catch composition of the pelagic trawlers, with the purpose to understand if these species are present or not, because it is relevant for their stock assessment. In principle, at least *Sarda sarda* should be included among the species listed on Table III C 4, with the note that sampling will be conducted on opportunistic base.

Section III.F - Transversal variables

MS should provide more information on the methodology to collect effort variables (including statistical methodology, sampling size, information on the whole population, raising methods) and data to be collected through the questionnaire survey proposed in the NP.

MS should provide more information on the methodology to collect landing data (including statistical methodology, sampling size, information on the whole population, raising methods) and data to be collected through the questionnaire survey proposed in the NP.

Section III.G - Research surveys at sea

SGRN notes that there is not correspondence concerning the names of all the surveys. MS should strictly follow the names of the surveys as included in Annex IX of the Commission Decision 949/2008. MS should revise the related table.

In Table III.G.1 MS should provide the maximum days as stated in Annex IX of the Commission Decision 949/2008.

MS proposes the conduction of two beach seine surveys, not eligible under the present DCF (see Annex IX of Decision). Such a proposal on a new survey should be submitted to STECF. SGRN cannot accept this survey proposal.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

A description of the sector is given with information on volume and value of production, number of enterprises and main species, referring to 2007.

MS gives all information required in tables IV.A.1. The planned sampling rate in table IV.A.2 is not reflected in table IV.A.3. Especially the data quality methods mentioned and the corresponding very low planned target rate seem not compatible. MS should clarify this, especially what the percent number regarding data quality method means. MS is required to revise the table IV.A.3.

The information on financial issues of the staff has not to be mentioned in this section.

Romania gives sufficient information on data sources. No definition of variables is mentioned. MS should deliver this where necessary according to Comm. Dec. 2008/949. MS does not give information if it collects employment data by gender. MS should clarify this.

The specific aspects of collecting and evaluating of data requested will be discussed with Bulgaria, specially for the species growing in both countries (carp, goldfish) and for the similar companies as size (volume and surface). The meeting should be planed taking into account the advices of the scientists of Romania and Bulgaria, under EC approval. SGRN appreciates this planned coordination but notes that Bulgarian national program does not mention this coordination ("No regional co-ordination under this module is foreseen.

Derogation:

During the execution of the NP, MS shall ask for specific derogations in cases where we need approval for calculation of some variables for which the national fiscal authorities issues a specific regulations. SGRN cannot accept this approach as all request of derogations should be asked before the implementation of the program.

Processing industry

MS gives sufficient information in table IV.B.1, but does not list all necessary parameters in table IV.B.2. MS is request to revise table IV.B.2 according to the legal obligations.

It is unclear, on which basis MS plans a precision target of 5 % when the planned sample is at least 50% for Companies with 11-49 employees and at least 36% for Companies with <= 10 employees. MS should give further information on the statistical methodologies used to define the sampling size according to the precision levels.

Romania gives sufficient information on data sources. No definition of variables is mentioned. MS should deliver this where necessary according to Comm. Dec. 2008/949. MS does not give any information if it collects employment data by gender. MS should clarify this.

In the NP MS states: "The units for fish processing are different from the point of view of employers, varying from the units with 2 employers to the units with over 300 employers." 300 employers seem implausible. MS should clarify.

Concerning Regional Coordination MS states: "The specific aspects of collecting and evaluating of data requested will be discussed with Bulgaria, specially for the technology of processing the species from the continental waters of the both countries (carp etc.) and for the similar companies as size. The meeting is planed taking into account the advices of the scientists of Romania and Bulgaria under approval of EC. "

SGRN appreciates this planned coordination but notes that Bulgarian national program does not mention this coordination ("No regional co-ordination under this module is foreseen."

Derogation

Ms states: “During the execution of the program we shall ask for some derogation in case for few variables, for which the national fiscal authorities issues a specific regulation. »

SGRN cannot accept this approach as all request of derogations should be asked before the implementation of the program.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

The estimation of indicators 8 is missing in the proposal of the MS. MS should complete Appendix XIII of Commission Decision 949/2008 or give justification for the missing one.

Section VI. - Module for management and use of the data

SGRN encourage the MS to participate to the relevant meetings. MS should clarify if data are provided to all relevant WGs.

ENDS

7.19. SLOVENIA

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	YES	1, 4
Did NP have all the necessary Mandatory Standard Tables?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	2
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	MOSTLY	2
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	
Are amendments required to the MS National Programme?	MOSTLY	3

1 SGRN acknowledges the effort made by MS to adjust its NP to the new DCF.

2 The lack of information in some tables makes it difficult to evaluate the derogations requested.

3 The NP is in general in line with the DCF however minor adjustments have to be made according to the specific comments listed below.

4 SGRN refers MS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. - Generalities

MS should complete table II.B.1 with the list of all the international coordination.

Section III.B - Economic variables

Capital cost/value and employment should be estimated applying the common methodologies reported in the DCF. SGRN refers MS to the general comments on the Estimation of capital value and capital costs and on estimation of employment.

Different data sources will be used to collect economic variables, but no text is provided to check their consistency. See general comment on the consistency of different data sources. MS should indicate when the final data will be available.

No information is given on the calculation of the ecosystem indicator fuel efficiency. SGRN refers MS to the general comment on the estimation of the ecosystem indicator “fuel efficiency”.

Section III.C - Biological - metier-related variables

SGRN notes that there are discrepancies between the text and the table. SGRN notes that for landings (section IIIC2.3) in the text only two metiers are mentioned to be sample while the ranking system picked up 5 metiers and this is also mentioned in table III.C.3. This is also evident from table III.C.4 where only two species were selected. MS should better clarify this point.

SGRN notes that for discards the text and tables comply with sampling for 5 metiers. MS should clarify why sampling for discards will be performed but not sampling for landing. If a derogation is requested this should be clearly stated.

In table III.C.3 MS should list the number of planned trips for landings.

SGRN notes that details of how quality will be assessed, is not clear, more details are required. MS should describe how the minimum number of fish to be sampled was derived to achieve precision level, mentioning statistical details.

The national stratification is not clear since not enough details on the small scale fishery are available, this cannot be determined completely. MS are requested to clarify this point.

MS required conducting a pilot study on eel. MS should clarify why pilot study has to be conducted.

MS should justify derogation (at the moment not present) for some species of the Group 1 which are not listed in table III.C.4, and for Group 2 species.

Section III.D - Biological - Recreational fisheries

SGRN reminds MS that the DCF requires the sampling of recreational fishery only on eel and *Thunnus thynnus*. MS stated that a pilot study has been performed in October – 2007 2008; a report on the study should be submitted to SGRN.

SGRN notes that an additional pilot study is required. It is not clear whether the pilot study proposed will include catches from eel, or whether MS requests derogation for the species. No pilot study should be granted until the report of the previous pilot study is submitted and evaluated.

The MS requested the derogation for the tuna recreational fishery on the base that does not exist, while there is the evidence that at least some tuna sport activities exist in Slovenia. SGRN recommends that a pilot study shall be conducted by Slovenia in 2009 and 2010.

Section III.E - Biological - stock-related variables

SGRN suggest to MS to update the table III.E.3 with the correct required precision target (CV 2.5 %) and the correct minimum number of fish necessary to achieve the precision.

Section III.G- Research surveys at sea

SGRN recommends the MS to carry out the MEDIAS survey in accordance with the period decided by the MEDIAS Steering Committee as included in the MEDIAS protocol.

In Table III.G.1, concerning MEDIAS survey, MS should provide the maximum days eligible according to the Commission Decision 949/2008 (Annex IX).

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

MS refers to regulation concerning data collection of fresh water species being not mandatory. MS should clarify then if it is not collecting data on fresh water species or if it does.

Concerning imputed value of labour, MS says: “In this case, the owner does not receive a “salary” in the sense that a hired fisherman would, but receives an emolument due to the capital invested (in the form of the vessel and other physical capital). What remains is the

income of the fisherman, who is at the same time the owner of the vessel, i.e. the mixed income or the operating surplus, depending on how the fisherman is registered. “ This is the part of the DCF concerning the aquaculture sector, so MS should not define this as unpaid labour of a fisherman/vessel owner. To be clarified by MS.

It even remains unclear if MS collects data on employment with gender specification. MS should clarify this.

Processing industry

MS gives necessary information on data quality, sources, methodology and definition of variables. Regarding capital value MS defines: “Total value of assets – accumulated value of all net investments in the enterprise at the end of the year; the data will be collected from accounting records.” MS should clarify this definition, in particular con reference to the definition of the variable “investment”.

Concerning imputed value of labour, MS says: “In this case, the owner does not receive a “salary” in the sense that a hired fisherman would, but receives an emolument due to the capital invested (in the form of the vessel and other physical capital)(...) What remains is the income of the fisherman, who is at the same time the owner of the vessel, i.e. the mixed income or the operating surplus, depending on how the fisherman is registered. “ This is the part of the DCF concerning the processing industry, so MS should not define this as unpaid labour of a fisherman/vessel owner. To be clarified by MS.

It even remains unclear if MS collects data on employment with gender specification. MS should clarify this.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

The estimation of indicators 5-7 is missing in the proposal of the MS. MS should complete Appendix XIII of Commission Decision 949/2008

Section VI. - Module for management and use of the data

The quality control and validation process is missing. MS should update the text. SGRN encourage the MS to participate to the relevant meetings. MS should clarify if data are provided to all relevant WGs.

Section VIII. - List of derogations

MS should check from SGRN comments whether derogations have been requested. Information on expenditure should be avoided in the future NPs

ENDS

7.20. SPAIN

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	YES	1, 5
Did NP have all the necessary Mandatory Standard Tables?	NO	4
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	1, 3
Is the general description of the Fisheries Comprehensive?	MOSTLY	1
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	MOSTLY	
Overall - Did the MS conform to Article 4 of 199/2008	MOSTLY	4
Overall – Did the MS conform to Article 5 of 199/2008	MOSTLY	
Are RCM recommendations taken into account?	NO	2
Are amendments required to the MS National Programme?	MOSTLY	3, 6

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations in the Belgium NP.

3 SGRN refer MS to the general comments

4 The lack of information in some tables makes it difficult to evaluate the derogations requested. SGRN considers that some derogation cannot be accepted; more information were requested to evaluate some others

5 Better co-ordination should be sought with other MS

6 The NP is in general in line with the DCF however some adjustments have to be made according to the specific comments listed below.

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. – Generalities

In section I, there is no specific mention regarding the impact of the shift to the DCF on the MS NP proposal.

Section III.B - Economic variables

No information is given on the approach followed to allocate vessels in each supra region (e.g. fishing days, catches). MS to clarify.

Clustering of segments with less than 10 vessels is well reported in Table III.B.2, but the text does not explain the scientific evidence justifying these clusters. SGRN refers MS to the general comment on clustering of segments.

The sampling strategy is not described in details and further information should be given regarding method to determine the sample size and to raise the final estimates to total population.

No information is given on the calculation of the ecosystem indicator fuel efficiency. In particular, under the derogations and non conformities, it is said that energy cost will not be collected. But this derogation is not properly justified. SGRN refers MS to the general comment on the estimation of “fuel efficiency”.

Under the paragraph on derogations and non conformities several comments are reported to explain the difficulties in collecting some variables and to ask better explanations of the variables themselves. SGRN recommends following the list of variables and the definitions reported in annex VI of the DCF.

Regarding estimation of capital value/costs and employment, MS shall apply the methodologies of the studies reported in the DCF. SGRN refers MS to the general comments on the estimation of capital value and capital costs and On the Estimation of employment.

“Value of landings per species” and “Average price per species” shall be collected according to appendix III of the DCF as the rest of the economic variables and in the case different data sources are used, the MS should ensure consistency of the final estimates, as required by the DCF. No derogation can be accepted for these variables.

Section III.C - Biological - metier-related variables

MS presents a sampling programme inline with the new DCF, in particular regarding fleet-fishery based sampling (metier stratification and concurrent sampling). However, MS acknowledges that it is impossible at the moment to have a clear perspective of the precision it will achieve and that sampling intensity will be adjusted in the future based on experience built. SGRN refer MS to general comment on precision.

Duration of fishing trips is 2-3 months and 25% of trips (2 out of 8) are covered by sampling. It is not clear whether observers are on board during the whole trip. MS to clarify.

MS is reminded to follow strictly the naming convention and fishing grounds delimitation as proposed by the RCM NA in 2008, in future NP proposals and technical reports.

No sample for long liners targeting deep water species in VII, VIII and IX. MS suggests carrying out the necessary pilot studies to implement a sampling programme in the future. SGRN recommends to include these métiers in the routine sampling programme.

MS merges OTB_DEF in CIES area VIII fishing with mesh sizes >80m and <110m based on operational constraints. No statistical background is presented. The mergers of these métiers seem reasonable, but no scientific evidence was brought. SGRN refers MS to general comment on metier mergers.

Text tables in section III_C of the NP proposal, about data quality should only be included if metiers are stratified further than level 6. MS to remove tables in future NP proposal.

In Table III_C_1, all metiers should be presented, not only those that have been ranked. SGRN cannot assess the relevance of métiers not chosen in the ranking system, in particular with reference to specific selection. MS to resubmit a full table III_C_1.

Derogations regarding metier-related variables should be presented by metier not by species.

When the discarding occurrences of species are rare so that the collection of otoliths result in very few individuals a year, SGRN endorses the derogations demanded by MS.

MS asks for a derogation regarding sampling the fleet operating in the CECAF area. SGRN recognizes the difficulty in sampling this fleet but call the attention of the MS that this derogation has been asked several times in the past and until now no progress has been shown regarding sorting out the problem. SGRN recommends the MS to present an action plan regarding the inclusion of this fleet in the MS sampling programme. See also general comment on long distance fisheries.

MS should better clarify if all the vessel population is covered. These details should be better mentioned in the text.

SGRN appreciates the work done by MS in selecting metier at GSA level. However, following the Regulation, SGRN suggests to MS to carry out the Ranking System at National Level, at least for the Mediterranean area. SGRN notes that there are no details in the text on how the ranking system was applied and which data sets were used. Values data are not reported for all the fisheries. From the text it is not clear how many metiers have been selected by the ranking procedure for sampling. MS is requested to better clarify it in the text. Moreover, sampling protocol should be better specified for all the metiers selected.

In Table III.C.3, considering that the numbers of planned trips are very low and do not comply with the minimum of one trip per month, SGRN assumes that the number of trips to be sampled does not refer to the total number of trips per year, but to the number of trips per month. In such a case, MS should revise the table.

In Tables III.C.1, 2, 3 and 4 the fishing ground should be in line with the codes in the guidelines, (e.g. code BF59 is not accepted). MS should revise the table.

In Table III.C.4 no information is given on the minimum number of fish necessary to achieve the precision target; however, this information should be available from past sampling programs. MS should revise the table.

In Table III.C.4 the group of species should be consistent with the ones present under the Appendix VII of the Commission Decision 2008/949/EC.

SGRN notes that although discard sampling seems to be planned as mentioned in the tables, there is no reference of this in the text. This information should be better mentioned in the text.

MS should better describe the methods used for assessing the quality of data.

Concerning the initiatives taken to coordinate the sampling programme with countries of the same marine region, a bilateral agreement should be sought with France.

SGRN notes that no derogations have been requested for species of Group 1 and Group 2 which are not mentioned in table III.C.4 (e.g. *Raja clavata*). If derogation is requested for those species that are not present in table III.C.4 a justification must be presented (e.g. If the species is under 200tons in landings).

SGRN recommends to MS that for metiers that have been selected in the ranking system but with no discard trips planned, derogation for discards should be requested. MS should submit an explanation possibly based on discards information for each metier and statistical evidence must be proved.

The derogation to collect data from the large pelagic fleets fishing in the Pacific is requested upon the motivation that landings take place in several Countries and that sampling will be difficult and costly. But, on pages 99/100 of the NP, it is reported that catches in the Pacific are monitored by IATTC observers. This point needs a clarification. Derogation cannot be provided because distant fisheries shall be sampled anyway and, eventually, bilateral agreements should to be established for this purpose (with IATTC or the Countries where landing take place).

Section III.D - Biological - Recreational fisheries

MS provides no information on recreational eel fishery. Moreover, MS does not request derogation for sampling recreational eel fishery. MS should explicitly requests derogation, with the relevant justification, for not sampling eel recreational fishery. SGRN recommends MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational Fisheries (WKSMTF) that will be held in Nantes, France in May 2009.

Section III.E - Biological - stock-related variables

SGRN notes that no regional coordination is planned. However, SGRN recalls that Spain and France have shared stocks in the Gulf of Lion (GSA 7), and invites the two MS to consider the possibility for a regional coordination for sampling stock-related variables, during the next PGMed and RCM MED&BS meetings.

MS requests derogation for sampling *Anguilla anguilla*, based on the 200 tons threshold of landings. SGRN considers that such derogation should not be granted, taking into account that the species is under a recovery plan.

SGRN takes note of the derogation requested concerning anglerfish species (i.e. no collection of stock-related variables for *L. piscatorius*). However, SGRN notes that since the submitted landings data in Table III.E.1 is aggregated for both *Lophius* species (*L. budegassa* and *L. piscatorius*), and due to the large amount of landings (more than 1000 tons), stock related variables should be collected for *L. budegassa* and *L. piscatorius*. The derogation can only be granted if landing statistics for each *Lophius* species is provided and are less than 200 tons. SGRN reminds the MS that within the DCF additional biological sampling programme of the unsorted landings have to be carried out, in order to estimate the share of the various species that are internationally assessed, including anglerfish.

MS should update Table III.E.1, by providing landings data and share in EU landings for all the stocks in the Mediterranean region that are included in Appendix VII of the Decision.

MS should provide in Table III.E.3 the number of fish to achieve the precision target for all demersal species. This number should be available from past sampling programs. MS should revise the table.

The MS does not present information about the randomization of the sampling programmes. SGRN requires further information. The MS does not present information about the spatial and temporal coverage of the sampling programmes. SGRN requires further information.

The derogation (NP III.E.5) is requested for sampling several biological parameters in several species in the Mediterranean, in the ICCAT, in the IOTC and in the Pacific areas, with various justifications. As concerns the catches of *Thunnus alalunga* and *Thunnus thynnus* in the Atlantic, where Spain reports that the large majority of the catches is immature, SGRN recommends that the fraction of the catches related to mature specimens should be sampled for the biological parameters, also taking into account the quantities concerned. The request for derogation concerning the other species in the various oceans is acceptable if these data are not mandatory according to the various RFMOs concerned.

Derogation and Non Conformity

MS asks derogation for sampling maturity of blue whiting. SGRN endorses the derogation and recommends that maturity coverage of blue whiting be assessed in the RCM NA.

MS asks derogation for sampling rays. Under the DCF, the rays are in G1, thus SGRN recommends MS to make all effort to collect such information on-board commercial fishing vessels.

Section III.F- Transversal variables

The effort variables collected by the MS must be as given in Appendix VIII of the Decision. Spain refers only to the variables: fishing days, gear and number of fishing operations. What with the other effort variables, as no derogation are demanded either?

MS to clarify.

The MS provides the required information and is in conformity with the regulation requirements, except for vessels <10m. SGRN requests more information about this sampling programme.

Section III.G - Research surveys at sea

International redfish survey was listed in Table IIIg1, but no description in the English translation of the text. MS to clarify.

MS provides the necessary information regarding surveys, except for REDNOR. SGRN asks for more information regarding this survey.

MS proposes a survey ECOMED that is not in the eligible list. SGRN refers MS to general comment and to the eligible list of surveys.

MS should resubmit the Medits map with the planned hauls. SGRN notes that in table III.G.1, concerning the Medias survey, MS should provide the number of planned transects and the maximum days eligible according to the Commission Decision 949/2008 (Appendix IX).

SGRN takes note of the text concerning the modification of the survey. Following the request of MS to conduct two surveys (Echomed and Medias) SGRN reminds the MS that Echomed is not an eligible survey under the DCF.

SGRN recommends the MS to carry out the MEDIAS survey in accordance with the period decided by the MEDIAS Steering Committee as included in the MEDIAS protocol.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture

Spain should clarify the sampling strategy used for different variables and segments. In particular, in Table IA.A.2 it is stated that some strata will be covered by a census, but then in table IV.A.3 it is indicated that most of the variables will be estimated through sampling for all the segments.

The section on derogations contains a list of comments and request for clarification regarding the definition of some variables. SGRN recognises the difficulty of collecting economic data for the aquaculture sector, also considering that this is a new module of the national program. However, the lack of standardized definition cannot be used as an excuse not to cover all the variables of Appendix X of the DCF. SGRN suggests that the MS provides clear information in their NP Proposals and Technical Reports concerning the measurements and the definition of the parameters listed in Appendix X of the DCF.

SGRN refers the MS to the general comment on inputted value of unpaid labour.

Processing industry

Total population will be monitored exhaustively for companies with more than 50 employees and through a sample approach for companies with less than 50 employees. The sampling strategy for this part of the population should be better explained and further information on methods to determine the sample size and to raise the estimates should be given. SGRN recommends collecting the variable “energy cost” for the whole population, as no derogation is required nor justified.

Derogations and Non Conformities

Spain asked derogation for the variable Purchase of fish and other raw materials for production. SGRN considers this variable very relevant in the context of the DCF and therefore recommends MS to comply with the requirement of the DCF.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

MS does not provide information regarding indicators 5, 6 and 7. SGRN notes that these indicators are mandatory under the DCF. SGRN requires the MS to provide further information about the integrations of these indicators.

The estimation of indicators 5-7 is missing in the proposal of the MS. MS should complete Appendix XIII of Commission Decision 949/2008

Section VI. - Module for management and use of the data

The MS is starting the process of developing a central database to store and manage all variables required by the DFR.

MS does not provide information about quality control of stored data and data processing.

Section VIII. - List of derogations

The list of derogations does not seem complete, as it does not include derogations requested for the current year. MS is invited to use the format proposed in the SGRN 08-01 guidelines for presenting the list of derogations.

Section X. - Comments, suggestions and reflections

Suggestions are made for amending the standard tables of the SGRN guidelines. SGRN will consider the suggestions reviewing guidelines.

7.21. SWEDEN

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	Yes	1 , 4
Did NP have all the necessary Mandatory Standard Tables?	Yes	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?	MOSTLY	3
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	
Overall - Did the MS conform to Article 4 of 199/2008	YES	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	NO	2
Are amendments required to the MS National Programme?	YES	3

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 The proposal was submitted within the commission deadline. The RCM met after the deadline and no account was taken of its recommendations in the NP.

3 Discard level for metiers which are not selected by ranking is not included in the NP. See General comments on Discard and landings sampling.

4 SGRN refers MS to the General Comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section III.B - Economic variables

The collection of data is well explained and presented in the text of NP, however the method of raising the sample results to the total population is not clearly presented.

Something is mentioned about the calculation of imputed value of unpaid labour in the text of NP. However more clear information of method of calculation is needed. See also general comment on the calculation of imputed value of unpaid labour

It is stated in the Swedish NP, that “by experience, the capital value of the non-active vessels is similar to capital costs of active vessels”. The statement is not clear for evaluators as capital value and capital costs are different parameters.

According to the guidelines MS has to provide the method of estimation of fuel efficiency of fish capture in the Section III.B of the NP. Sweden doesn't provide this information in the NP. MS should follow the guidelines and provide the missing information to the Commission. See also general comment on the estimation of the ecosystem indicator “fuel efficiency”

Section III.C - Biological - metier-related variables

It is not clear if < 10 are included. To be clarified by MS.

Derogations and non-conformities

SGRN refers MS to the general comment on discard and landings sampling.

Section III.D - Biological - Recreational fisheries

SGRN is not able to assess the quality of the sampling scheme before the results of the ICES workshop (WKSMTF) will be available.

Section III.E - Biological - stock-related variables

For herring in SD30 and 31, the sample size specified by precision level is larger than planned by the MS. To be clarified by MS.

Derogations and non-conformities

Cod in SD 22-24 is not sampled for maturity because the fish is landed gutted. However, SGRN notes that maturity data for this stock are collected during surveys. For salmon, the fact that maturity data are not currently used in the assessment is not a reason to ask for derogations. For river index, excessive costs are advocated for not completely cover sampling of all planned index rivers. To be clarified by MS. SGRN suggests MS to provide a cost/benefit analysis in detail to determine the excessive cost as mentioned in the NP .

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

In the text the number of 219 enterprises is mentioned, in Table IV.A.2, 207 enterprises are given as total population. The year data refer to is 2008. It is unclear whether this data belongs to the planned sampling or if it reflects the situation in 2008 concerning the whole population. MS to clarify.

The information concerning data acquisition and methods used as well as description of sources and the definitions are sufficient. Sweden states, that “some segments and sub-segments are very small and will therefore only be presented on a larger scale” which is absolutely plausible. SGRN note that no derogations are mentioned.

Processing industry

The tables concerning the processing industry give the necessary information for both year data are collected for. They list all variables and give all relevant information concerning Data quality, sources and sampling strategy. As Sweden collects data concerning employment by gender, it should be clearly stated, if FTE is also estimated by gender. SGRN note that no derogations are sought.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

Fuel consumption estimates and discard are not mentioned. MS to clarify.

ENDS

7.22. UNITED KINGDOM

A) GENERAL COMMENTS

GENERAL QUESTION		COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?	MOSTLY	1, 2
Did NP have all the necessary Mandatory Standard Tables?	YES	
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the conformity of the MS 2009-2010 National Programme?.	MOSTLY	3, 4
Is the general description of the Fisheries Comprehensive?	YES	
Are there Derogations associated with the NP?	YES	
Are there justified non-conformities associated with the NP?	?	1
Overall - Did the MS conform to Article 4 of 199/2008	MOSTLY	
Overall – Did the MS conform to Article 5 of 199/2008	YES	
Are RCM recommendations taken into account?	YES	
Are amendments required to the MS National Programme?	YES	3, 4

1 The member state has made a significant effort to comply with the new regulation. In common with other member states, there is no statistical evidence put forward to justify merging metiers but nevertheless the mergers that are proposed are sensible.

2 The use of HTML link to WebPages to fully describe the methodologies is certainly a way to be discussed and promoted for future NP submissions.

3 Additional information is needed in particular in the fields of metier related variables (see section III.C below).

4 SGRN refers NMS to the general comments

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. – Generalities

Meetings taking place in 2010 were not reviewed as an approved list for that year is not available

Not all the population will be covered. In particular, Table III.B.1 reports that the segment of inactive vessels < 10 m (2094 vessels) will not be sampled. SGRN reminds MS that economic variables have to be collected for all the registered vessels.

The sampling strategy is not described in details and further information should be given regarding methods to determine the sample size and to raise the final estimates to total population. MS should indicate when the final data will be available.

Employment should be estimated according to the common methodology reported in the DCF. SGRN refers MS to the general comment on the Estimation of employment

UK will use different data sources for the collection of economic data. No text is provided on the consistency of them. SGRN refers MS to the general comment on the consistency of different data sources.

MS should justify the clustering of segments reported in Table IIIB2. SGRN refers MS to the general comment on clustering of segments.

Section III.C - Biological - metier-related variables

MS should avoid excluding métiers from the ranking system, as SGRN may not assess their relative importance. There is a provision in the DCR for “undefined” métiers and it is coded MIS for the use of miscellaneous gear. This coding is acceptable as long as the “undefined” metier remains marginal. MS to resubmit a full table III_C_1.

MS is reminded to follow strictly the naming convention and fishing grounds delimitation as proposed by the RCM NA in 2008, in future proposals and technical reports.

MS should make all effort to avoid the use of mesh size coding “TODD” which means no information is available concerning the mesh size used. SGRN supports the recommendation made by RCM NA 2008 stating that “*MS are invited to investigate closely on the mesh size range actually used*”.

The mergers of métiers across fishing grounds are not permitted in the Regulation. The RCM NA has undertaken intersessional work to address the issue of coordination of sampling the small pelagic fisheries, without questioning the relevance of referring to every fishing grounds impacted.

No specific derogation is demanded but SGRN found the following unconformities:

No sampling for discards planned for all regions, for the métiers not selected by the ranking system and using gears known to generate discard rates over 10% for a set of important species (SGRN, 2006). These gears are OTB, PTB, OTT, SSC, GTR, TBB.[General comment for all countries]
The following métiers selected by the ranking system have no plans for sampling discards and landings

- OTM_SPF in ICES area V
- GNS_DWS in ICES areas V, VIII and IX.
- OTB_DEF_70-89_0_0 in ICES divisions VIIa, VIIbck
- OTB_SPF in ICES divisions VIIbck,
- GNS_DEF in ICES divisions VIIbck, VIIfghj
- LLS_DWS in ICES division VIIbck
- LLS_DEF in ICES division VIIbck
- OTB_CRU in ICES division VIIbck
- OTB_MOL in ICES division VIIe
- GNS_CRU in ICES division VIIfghj
- GNS_SPF in ICES division VIIfghj

The following métiers selected by the ranking system have no plans for sampling discards

- OTB_SPF in most of fishing areas.

No sampling at all planned for the métiers operating in ICES area VIII.

SGRN recommends MS to implement a sampling programme or bring all supportive information for not sampling the métiers cited above.

SGRN recommends MS to report the outcomes of the scientific analysis of sampling at sea the métiers FPO_CRU and LHM_FIF to the RCM North Atlantic.

Section III.D - Biological - Recreational fisheries

Recreational fishery for eel in marine or inland waters is not mentioned; Also the objective of obtaining quantitative annual estimates of catch volumes is not mentioned –SGRN recommends MS to follow the provisions of the DCF and consider the outcomes of the Workshop on Recreational fisheries (WKSMRF) that will be held in Nantes in May 2009.

The actions taken to sample the salmon recreational fisheries are well described in section III.I. The 3-year research project initiated by MS for the other species should provide all elements needed to SGRN evaluation process. SGRN recommends MS to provide a pre-report of the outcomes of this project in early 2010, in order to evaluate the actions programmed for the 2011-2013 period.

Section III.E - Biological - stock-related variables

Derogations and non-conformities.

SGRN appreciates the effort made by MS to formalize bilateral agreements with other institutes. Because such bilateral agreements are the relevant solution for the collection of biological information when the species is not landed in MS harbors, SGRN cannot endorse a request for derogation.

Species	Area / Stock	Species Group	Derogations and non-	Justification

			conformities	
Brosme brosme	I, II	2	<200t	yes
Gadus morhua	I, II	1	Bilateral with Norway	yes
Melanogrammus aeglefinus	I, II	1	Bilateral with Norway	yes
Pandalus borealis	I, II	1	<10%	yes
Pollachius virens	I, II	1	<10%	yes
Reinhardtius hippoglossoides	I, II	1	<200t	yes
Sebastes marinus.	I, II	1	<200t	yes
Ammodytidae	IV	2	<10%	yes
Anguilla anguilla	IV, VIId	1	<10%	yes
Anarhichas spp.	IV	2	RCM NS&EA Recommendation 2008	yes
				yes
Argentina spp.	IV	2	<10%	yes
Aspitrigla cucullus, Eutrigla gurnardus, Trigla lucerna	IV	2	<10%	yes
				yes
Brosme brosme	IV, IIIa	2	<200t	yes
Crangon crangon	IV, VIId	2	<10%	yes
Limanda limanda	IV, VIId	2	<10%	yes
Macrourus berglax	IV, IIIa	2	<10%	yes
Molva dypterygia	IV, IIIa	1	<200t	yes
Mullus barbatus	IV, VIId	2	<10%	yes
Nephrops norvegicus	functional unit 10	1	<200t	yes
Nephrops norvegicus	functional unit 32	1	<200t	yes
Nephrops norvegicus	functional unit 33	1	<200t	yes
Phycis blennoides	IV	2	<200t	yes

Platichthys flesus	IV	2	<200t	yes
Pleuronectes platessa	IV	1	Bilateral with the Netherlands	yes
Psetta maxima	IV, VIId	2	Bilateral with the Netherlands	yes
Reinhardtius hippoglossoides	IV	2	<200t	yes
Salmo salar	IV	1	<200t	yes
Scophthalmus rhombus	IV, VIId	2	Bilateral with the Netherlands	yes
Sebastes mentella.	IV	1	<200t	yes
Shark-like Selachii	IV	1	<10%	yes
Shark-like Selachii	IV, VIId	1	<10%	yes
Solea solea	IV	1	<10%	yes
Sprattus sprattus	IV	1	<10%	yes

Small quantities of *Thunnus obesus*, *Thunnus alalunga*, *Makaira nigricans* and *Sarda sarda* have been reported to ICCAT in recent years. More relevant quantities of shark species (mostly *Prionace glauca*) have been also reported to ICCAT. Table III E1 reports catches of *Thunnus alalunga*, *Lamna nasus* and *Prionace glauca* <200 t but no one of these species is included in table III C4 for the size sampling. All species under the ICCAT competence shall be monitored for task I (catches) and task II (size frequency), even if occasionally caught and opportunistically sampled. SGRN recommends that table III C4 shall be amended accordingly for the species in group 1 and (for length only) group 2. NOTE: LARGE PELAGICS: Does the UK fleet fishing for squids and other pelagic species in the Western South Atlantic still exist? If yes, it shall be included. To be clarified.

Section III.F - Transversal variables

Non-conformity regarding the soaking time of passive gears, i.e. pots and traps; non-conformity is justified and does not affect the precision levels of the DCF.

Remark: RCM NS&EA recommend the STECF to have a closer look at the quality of some of the transversal variables. UK has committed itself to make amendments to any systems or methodologies in light of RCM recommendations for these data.

There seem to be some misunderstandings as regards the variables needed for estimating/collecting the effort variables of the passive gears. SGRN states that “*The recording of fishing effort for pots and traps is a function of the total number of pots owned by a fisherman, how many are in the sea at any one time and the length of time they are left to soak*” and considers that there is no need to collect the soaking time if one of the three variables are absent from the DCF. SGRN is of the opinion that only the number of pots that are in the sea at any one time is relevant and combined with the length of time they are left to soak, gives a correct estimates of the effort (see also the report on Small-scale fishery, Kavala, 2005). SGRN recommends MS to add both as mandatory variables to be collected or estimated by any appropriate means, and agrees with MS approach to seek for best practise in the RCM.

Section III.G - Research surveys at sea

Four surveys are listed in Table IIg-1 and also described in the text that does not appear in Appendix IX of decision 949-2008: (Rockall survey, deepwater survey, UK North-Ireland western IBTS Q1, UK North-Ireland western IBTS Q4). The latter two are referenced by text indicating their exclusion from Appendix IX is an oversight. MS to clarify.

The objectives, methodology, data storage and ecosystem indicators are given for all surveys, but not any maps of the area coverage. SGRN recommends MS to provide maps of area coverage of the surveys in the report adjusting 2010 NP proposal.

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

A description of the sector is given with information on volume, value and main species referring to 2006. UK gives sufficient information in table IV.A.1 but the word «minor» is not covered by the regulation, or Comm. Dec. nor the guidelines. In table IV.A.2 only one data reference year is mentioned. MS should comment on this.

The description of data quality and sampling strategy is sufficient. But no definition of variables or sufficient description of method of calculation is given, e.g. for capital value, unpaid labour or FTE calculation.

Processing industry

UK will employ SEAFISH under contract to fulfil the obligations concerning data collection for the processing sector. The description of data quality and sampling strategy is sufficient, a lot of additional data are planned to be collected. But no definition of variables or sufficient description of method of calculation is given, e.g. for capital value, unpaid labour or FTE calculation. MS should clarify this. MS sometimes refer to online sources concerning data quality methods. This is nice, but the relevant information should be given in the NP as well.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

There is a description of what will be done based on an algorithm that is being developed. The timeline for development of this algorithm should be stated by MS.

Section VI. - Module for management and use of the data

There are ongoing development of databases for transversal variables, métier related and stock related variables. Without threatening the full functioning of the current systems, these developments are expected to deliver their final products by 2010.

The NP is missing the description of the databases for surveys in certain areas, economic and processing industry variables. Information to be provided by MS.

There is no description of the methods used for controlling the quality and validating the data stored in the databases. Information to be provided by MS.

Section VIII. - List of derogations

Refers to derogations approved in 2006. MS has listed two derogations approved in 2006. The first relates to sampling fishing activities in areas I and II, and still stands under the new DCF. The second related to sampling *Nephrops* in FU10, does not stand under the new DCF as there are no more stock-related sampling for length.

Section X. - Comments, suggestions and reflections

The exclusion of certain surveys from the commission approved list is clearly an issue for the UK.

The MS NP proposal for 2008 has never been evaluated by SGRN.

ENDS

8. THE NEW DCF – CHALLENGES AND OPPORTUNITIES

The Commission gave a presentation on the challenges of the new DCF. These challenges also represent opportunities to improve the data used to provide scientific advice that supports the Common Fisheries Policy.

Decision making in fisheries management is based on sound scientific advice on stock status and on the state on marine ecosystems impacted by fisheries. Data is critical to the formulation of the scientific advice. The old DCR framework (2001-2008) established a routine and systematic collection of the basic data needed for scientific analysis. It established a standard, co-ordinated and cost efficient pan European data collection process and got both establish and new MS involved.

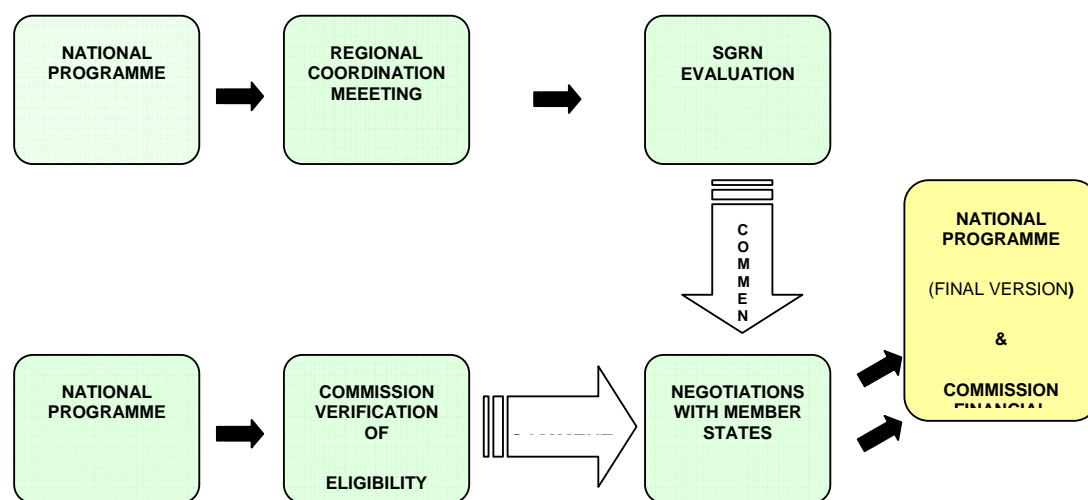
The new DCF faces great challenges in that it must meet the new demands of decision makers and the requirements for a new type of scientific advice. These new demands include a fleet based approach (metier; concurrent sampling), ecosystem approach to fisheries management (pressure and state indicators). An important aspect is that the selected indicators are to be based on existing or proposed monitoring programmes.

The new DCF must increase the usability of data and this will impact three main areas; data collection, data management and data access and use. There are new rules in the transmission of data, restrictions in access to data on the basis of protection of privacy for individuals or in the interests of companies to protect economic information. There are obligations for end users (policy) and a penalty system for non compliance (deadlines; transmission of data; quality aspects).

The new DCF will implement a more regional dimension. RCM's are established in order to assist MS in co-ordinating their National Programmes (Figure 2).

Another challenge for the new DCF is to increase the quality and validation of the data. This will be achieved through strengthening the co-operation with the main end users (e.g. ICES, GFCM, STECF), reinforcing feed back mechanisms (data submitted; data used for assessments; quality of data). The new DCF will also promote the development of validated methods to investigate and estimate quality indicators for relevant parameters and investigate optimal sampling intensity.

Figure 2. The new DCF. Implementation of a more Regional Dimension



9. DATA END USERS – FEEDBACK

Two key data end users (ICES and GCFM) participated in the meeting when it discussed the issue of data end user feedback to SGRN (TOR 5). ICES and GCFM each gave a short presentation to promote the feedback discussions.

ICES

The discussion focused on the new ICES advisory system in order to identify which ICES groups can provide feedback on data collection issues.. Benchmark workshops are the ICES expert groups where data used in assessments are evaluated and agreed. The feedback on data issues related to the quality of the assessment is discussed at benchmark workshops and in the assessment working groups. Usually this information is partially available in the expert group reports. This year, ICES is implementing a “data contact” person for each assessment working group and benchmark workshop. This person will be in charge of transmitting all data issues raised during the WG meeting to the PGCCDBS and RCMs. The data contact person will participate at these meetings and/or will inform the ICES secretariat of the issues. The feedback from the Benchmark workshop of round fish (WKROUND) was available to the SGRN and a draft version of the feedback is presented in Appendix 3.

As last year, ICES will compile information on a stock basis of the data provided to the relevant WG and used in the assessment. This information concerns; catches – landings and discards; length composition – landings and discards; age-length key; age composition – landings and discards; maturity data; sex ratio; fisheries dependent and independent tuning fleets. This year, ICES will compile this information in a database and make it available to SGRN at the beginning of June to assist with the evaluation of the 2008 technical reports. The information sent will be coming from the assessment working groups that used 2008 data on the assessment carried out before 1st June 2009 (the 2007 data will be presented for the assessment carried out after this date).

InterCatch is a web-based system, where national institutes can upload national fish catches per area, per time period, per fleet, etc. Data can be checked at any level. Fish stock coordinators can allocate sampled catch data to unsampled catches and aggregate all catch data. The aggregated output files can then be downloaded to the stock coordinators workstation. The output files may be used as input for the stock assessment models. InterCatch will be implemented for all stocks in 2009 which allow the documentation of the catch data provided and used in the assessments. InterCatch is under development and will provide in the future the feedback of all data provided and used for stock assessment purposes.

SGRN welcomed the new developments at ICES and considers that the feedback mechanism is evolving. SGRN anticipates that the database will assist in the evaluation of the 2008 Technical Reports. SGRN will provide feedback to ICES after the June 2009 meeting.

GFCM

The discussion focused on the GFCM advisory structures in order to identify which ICES groups can provide feedback on data collection issues. For the Mediterranean and Black Sea 24 countries + the EU are members of the General Fisheries Commission for the Mediterranean (GFCM). GFCM promotes development, conservation, rational management and the best utilization of living marine resources of the Mediterranean and the Black Sea. The Commission is the principal organ and the main decision-making body. In addition to the Commission itself, the GFCM is composed of a number of subsidiary bodies among which the Scientific Advisory committee (SAC) established in October 1997.

GFCM provides independent advice on the technical and scientific bases for decisions concerning fisheries conservation and management, including biological, social and economic aspects. Its mission is particularly devoted to:

- assess information provided by members and relevant fisheries organizations or programmes on catches, fishing efforts, and other data relevant to the conservation and management of fisheries;
- formulate advice to the Commission and recommend appropriate measures for the conservation and rational management of living marine resources, including measures regulating fishing methods and gear; prescribing minimum fish sizes; establishing open and closed seasons and areas; and regulating the total allowable catch and fishing effort;
- identify cooperative research programmes and coordinate their implementation;
- undertake such other functions or responsibilities as may be conferred on it by the Commission.

SAC operates through four subsidiary bodies:

- Sub-Committee on Stock Assessment (SCSA)
- Sub-Committee on Marine Environment and Ecosystem (SCMEE)
- Sub-Committee on Economic and Social Sciences (SCESS)
- Sub-Committee on Statistics and Information (SCSI)

The analyses presented to these Sub-Committees are carried out by various working groups which use data from national databases. The information produced by the DCF is of paramount importance for the assessment and management of the fisheries in which European fleets are involved in the Mediterranean. GFCM commented that there are issues with data availability from some MSs. The STECF have issued a number of calls for data for Mediterranean MS and further calls are planned for 2009.

SGRN considers the feedback mechanism as a very important part of the DCF process. The STECGF data calls process will be an important part in the development of a feedback process. SGRN encourages GFCM to develop a feedback system similar to ICES.

10. SUMMARY OF KEY SGRN RECOMMENDATIONS

SGRN-09-01 has identified four major areas that require urgent attention and would make the following recommendations.

Review of Guidelines for Submission of NP

SGRN recommends that a major review and revision of the guidelines for the submission of National Programmes should take place by early 2010. This review should also highlight inconsistencies in the DCF regulations.

Development of Procedures for review of NP

SGRN recommends that working procedures are developed for the review of National Programmes and that this should take place in early 2010.

Review of Surveys

SGRN recommends that a review of eligible surveys should take place before the next set of NP is submitted by MS in late 2010 for the years 2011 to 2013. This review should take place in early 2010 and should include feedback from the data end users. TOR's should be developed by STECF as soon as possible.

Data End User Feedback

SGRN recognises the critical importance of data end user feedback and welcomes the developments at ICES and at GFCM.

11. REFERENCES

Council Regulation (EC) No. 199/2008. Concerning the establishment of a Community Framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy.

Council Regulation (EC) No. 665/2008. Laying down detailed rules for the application of Council Regulation (EC) No 199/2008 concerning the establishment of a Community Framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy.

Commission Decision 2008/949/EC. Adopting a multiannual community programme pursuant to Council regulation (EC) no 199/2008 establishment of a Community Framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy.

RCM Baltic (2008) Report of the 1st Regional Co-ordination for the Baltic. Hamburg, Germany, 1st to 5th December 2008.

RCM MED&BS (2008). Report of the 1st Regional Co-ordination for thje Mediterranean and Black Sea. Sete, France. 24th to 28th November 2008.

RCM NA. (2008) Report of the 1st Regional Co-ordination for the North Atlantic. York, UK 8th to 12th December 2008.

RCM NS and EA. (2008) Report of the 1st Regional Co-ordination for the North Sea and Eastern Arctic. Aberdeen, UK. 17th to 21st November 2008.

SGRN (2007). Report of the Scientific, Technical and Economic Committee for Fisheries (STECF). Sub Group on Research Needs (SGRN). Analysis of derogations and non conformities of Member States data Collection National Programmes for 2008. . Gazzada, 3rd to 7th December 2007.

SGRN (2008). Report of the Scientific, Technical and Economic Committee for Fisheries (STECF). Sub Group on Research Needs (SGRN). Report of the SGRN-08-01 Working Group on the Review of Guidelines for the new DCR. Nantes, France 2nd to 6th June 2008.

12. ANNEX 2. AGREED QUESTION AND GENERAL COMMENTS USED BY SGRN IN THE EVALUATION OF NATIONAL PROGRAMMES

COUNTRY: XXXXX

A) GENERAL COMMENTS

GENERAL QUESTION	ANSWER	COMMENTS
Did NP Comply with SGRN-08-01 Guidelines?		
Did NP have all the necessary Mandatory Standard Tables?		
Did NP have all the necessary information to allow DG Mares /STECF/SGRN to evaluate the appropriateness of the MS 2009- 2010 National Programme?.		
Is the general description of the Fisheries Comprehensive?		
Are there Derogations associated with the NP?		
Are there justified non-conformities associated with the NP?		
Overall - Did the MS conform to Article 4 of 199/2008		
Overall – Did the MS conform to Article 5 of 199/2008		
Are RCM recommendations taken into account?		
Are amendments required to the MS National Programme?		

B) COMMENTS ON DEROGATIONS AND NON CONFORMITIES

Section I, II & III.A. – Generalities

- Were modifications/adjustments of the traditional way of doing made to conform to the new Regulation?

- Are the partners, involved in the data collection domain of expertise, listed?
- Is international coordination well identified?
- Is the MS fishing sector completely listed?

Section III.B - Economic variables

Data collection and quality issues

- Is all the population covered (incl. < 10m.)?
- Are the sources of information consistent with the coverage of the population/ not introducing bias?
- Is sampling protocol well described, including the allocation of vessels within segments, the clustering and the concordance of the segments with the Regulation?
- Are methods to raise the final estimates well documented?
- Are the variables collected comprehensive and well documented?
- Is it clear what the reference year is and when the data will be available?
- Is the method to estimate the fuel efficiency of fish capture described?
- Is the method used for assessing the quality of the data acceptable?

International coordination

- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?

Derogations and non-conformities

- List the derogations demanded and comment on their justification.

Section III.C - Biological - metier-related variables

Data collection and quality issues

- Is all the population covered (incl. < 10m.)?
- Is the selection of the metiers well described?
- Are merging of métiers statistically justified? (take into account the RCM recommendations)
- Is sampling protocol well described?
- Is sampling plan leading to some sort of bias? (e.g. non proportionality, ...)
- Is minimum requirement respected? is sampling plan specified with a precision objective?
- Is the method used for assessing the quality of the data acceptable?
- Is national stratification in line with the DCR?

International coordination

- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?

Derogations and non-conformities

- List the derogations demanded and comment on their justification.

Section III.D - Biological - Recreational fisheries

Data collection and quality issues

- Is all the population covered (incl. < 10m.)?
- Is sampling protocol well described?
- Is sampling plan leading to some sort of bias? (e.g. non proportionality, ...)
- Is sampling plan specified with a precision objective?
- Is the method used for assessing the quality of the data acceptable?

International coordination

- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?

Derogations and non-conformities

- List the derogations demanded and comment on their justification.

Section III.E - Biological - stock-related variables

Data collection and quality issues

- Is all the population covered (e.g. geographically and temporally)
- Is sampling protocol well described?
- Is sampling plan leading to some sort of bias? (e.g. non proportionality, ...)
- Is minimum requirement respected? is sampling plan specified with a precision objective?
- Is the method used for assessing the quality of the data acceptable?

International coordination

- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?

Derogations and non-conformities

- List the derogations demanded and comment on their justification.

Section III.F - Transversal variables

Effort data

- is all the population covered (incl. < 10m.)?
- Is sampling protocol well described?
- Is sampling plan leading to some sort of bias? (e.g. non proportionality, ...)
- Are the protocols and methods used well described?

- Are sources of information in line with the quality requirements?
- Is the method used for assessing the quality of the data acceptable?
- Is national stratification in line with the DCR?
- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?
- **List the derogations demanded and comment on their justification.**

Landings data

- is all the population covered (incl. < 10m.)?
- Is sampling protocol well described?
- Is sampling plan leading to some sort of bias? (e.g. non proportionality, ...)
- Are the protocols and methods used well described?
- Are sources of information in line with the quality requirements?
- Is the method used for assessing the quality of the data acceptable?
- Is national stratification in line with the DCR?
- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?
- **List the derogations demanded and comment on their justification.**

Section III.G - Research surveys at sea

- Correspondence of the surveys with the DCR, both in terms of technicalities and naming convention
- Is there a brief overview of the surveys?
- Is there a map of the surveys?
- Comment on the modifications demanded

Section IV. - Module of the evaluation of the economic situation of the aquaculture and processing industry

Aquaculture sector

Data collection and quality issues

- Is all the population covered?
- Are the sources of information consistent with the coverage of the population/ not introducing bias?
- Is sampling protocol well described, including the allocation of enterprises within segments, and the concordance of the segments with the Regulation?
- Are methods to raise the final estimates well documented?
- Are the variables collected well documented?
- Is it clear what the reference year is and when the data will be available?
- Is the method used for assessing the quality of the data acceptable?

International coordination

- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?

Derogations and non-conformities

- List the derogations demanded and comment on their justification
- Is there a demand for a pilot study? Comment

Processing industry

Data collection and quality issues

- Is all the population covered?
- Are the sources of information consistent with the coverage of the population/ not introducing bias?
- Is sampling protocol well described?
- Are methods to raise the final estimates well documented?
- Are the variables collected well documented?
- Is it clear what the reference year is and when the data will be available?
- Is the method used for assessing the quality of the data acceptable?

International coordination

- Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?

Derogations and non-conformities

List the derogations demanded and comment on their justification.

Section V. - Module of evaluation of the effects of the fishing sector on the marine ecosystem

- Does the MS made the necessary adjustments to account for the ecosystem approach in term of
 - Availability of VMS information
 - Calculation of discards rates per metiers
 - Survey protocol
 - Fuel consumption estimates

Section VI. - Module for management and use of the data

- Management
 - Is there a description of the storage database system
 - Is it clear how the quality control and validation process are made?
- Use of the data
 - Is MS participating to the relevant meetings?
 - Are data provided to all relevant WG?

Section VII. – Follow-up of STECF recommendations

- Is this information available?
- Is it partial or comprehensive?

Section VIII. - List of derogations

- Is there a list going back in time? Or is it the list for the current year?
- Is it incomplete or comprehensive?

Section X. - Comments, suggestions and reflections

- Is there any issue raised that needs to be addressed by SGRN

13. ANNEX 3. LIST OF QUESTIONS DEVELOPED BY ONE OF THE INDEPENDENT EXPERTS BEFORE THE SGRN MEETING.

These questions were sourced from the Council Regulation, Commission Decision, and Review of Guidelines for the new DCF. They were compared with the questions selected by SGRN (See Annex 1) to ensure the SGRN questions were consistent and comprehensive.

Aufgabe	Quelle	Zu behandeln im/beim <small>(National Programme Technical Report Regional Coord Mtg)</small>
The national programme shall include, in particular, the following matters as provided for in Section 2: a scheme for management and use of the data for scientific analyses purposes	199/2008 S. 5	NP
The procedures and methods to be used in collecting and analysing data and in estimating their accuracy and precision shall be included in the national programmes.	199/2008 S. 5	NP
In order to take into account any recommendation made at regional level at the Regional Coordination Meetings, Member States shall where appropriate submit amendments to their national programmes during the programming period. Those amendments shall be sent to the Commission at the latest two months prior to the year of implementation.	199/2008 S. 5	NP

Multi-annual national sampling programmes shall include, in particular: a sampling design for socio-economic data that permits the economic situation of the fisheries sector to be assessed and enables its performance over time to be analysed, and impact assessments of measures undertaken, or proposed to be carried out.	199/2008 S. 7	NP
The protocols and the methods used for the establishment of national sampling programmes shall be given by Member States and shall be, as far as possible: (a) stable over time; (b) standardised within regions; (c) in accordance with the quality standards established by the appropriate regional fisheries management organisations to which the Community is contracting party or observer and relevant international scientific bodies. 4. Accuracy and precision for the data collected shall be systematically estimated where required.	199/2008 S. 7	NP
The Member State shall provide to the end-users and the Commission, whenever necessary, a description of the methods applied to process the requested data and their statistical properties.	199/2008 S. 9	NP
In cases where a vessel operates in more than one supra region as defined in Appendix II, Member States shall explain in their national programme to which supra region the vessel is allocated.	Draft COMMISSION DECISION (2008/XXX/EC) S. 5	NP
In cases where a fleet segment has less than 10 vessels Member States shall report which fleet segments have been grouped at the national level and shall justify the clustering on the basis of statistical analysis;	Draft COMMISSION DECISION (2008/XXX/EC) S. 6	NP

In their annual report, Member States shall report the number of sampled vessels for each fleet segment regardless of any clustering made to collect or provide the data;	Draft COMMISSION DECISION (2008/XXX/EC) S. 6	AR
Regional Coordination Meetings shall define homogeneous clustering methodology at the level of supra regions so that economic variables are comparable.	Draft COMMISSION DECISION (2008/XXX/EC) S. 6	NP
Member States shall describe their methodologies used for estimating each economic variable, including quality aspects, in their national programmes.	Draft COMMISSION DECISION (2008/XXX/EC) S. 6	NP
Member States shall ensure consistency and comparability of all economic variables when derived from different sources (e.g. surveys, fleet register, logbooks, sales notes).	Draft COMMISSION DECISION (2008/XXX/EC) S. 6	NP
Precision levels Member States shall include in their annual report information on the quality (accuracy and precision) of estimates.	Draft COMMISSION DECISION (2008/XXX/EC) S. 6	AR
In order to optimise the sampling programmes, the metiers defined in Appendix IV (1 to 5) may be merged. When metiers are merged (vertical merging), statistical evidence shall be brought regarding the homogeneity of the combined metiers. Merging of neighbouring cells corresponding to fleet segments of the vessels (horizontal merging) shall be supported by statistical evidence. Such horizontal merging shall be done primarily by clustering neighbouring vessel LOA classes, independently of the dominant fishing techniques, when appropriate to distinguish different exploitation patterns. Regional agreement on mergers shall be sought at the relevant Regional Coordination Meeting and endorsed by STECF.	Draft COMMISSION DECISION (2008/XXX/EC) S. 7	NP

For the purpose of collection and aggregation of data, spatial sampling units may be clustered by regions as referred to in Article 1 of Regulation (EC) XXX/2008 after agreement by the relevant Regional Co-ordination Meetings.	Draft COMMISSION DECISION (2008/XXX/EC) S. 8	RCM
The degree of aggregation shall correspond to the most disaggregated level required. A grouping of cells within this scheme may be made provided that an appropriate statistical analysis demonstrates its suitability. Such mergers must be approved by the relevant Regional Coordination Meeting. <i>(transversal → fleet)</i>	Draft COMMISSION DECISION (2008/XXX/EC) S. 14	RCM
Wherever possible, transversal data shall be collected in an exhaustive way. Where this is not possible, Member States shall specify the sampling procedures within their national programmes.	Draft COMMISSION DECISION (2008/XXX/EC) S. 14	NP
Member States shall include in their annual report information on the quality (accuracy and precision) of the data. <i>(transversal → fleet)</i>	Draft COMMISSION DECISION (2008/XXX/EC) S. 14	TR
Member States shall describe their methodologies for estimating each economic variable, including quality aspects, in their national programmes. <i>(Aquaculture)</i>	Draft COMMISSION DECISION (2008/XXX/EC) S. 15	NP
Member States shall include in their annual report information on the quality (accuracy and precision) of estimates. <i>(Aquaculture)</i>	Draft COMMISSION DECISION (2008/XXX/EC) S. 16	TR
Member States shall describe their methodologies for estimating each economic variable, including quality aspects, in their national programmes. <i>(Processing)</i>	Draft COMMISSION DECISION (2008/XXX/EC) S. 16	NP
Sub-regions or fishing grounds are established by Member States for the first programming period (2009-2010); they may be redefined by Regional Coordination Meetings and agreed by STECF if necessary. This level should be consistent with existing geographical divisions.	Draft COMMISSION DECISION (2008/XXX/EC) S. 21 (Appendix II: "Geographical stratification by Region")	RCM

<i>Personnel cost- Imputed value of unpaid labour:</i> For example, the vessel owner's own labour. Chosen methodology should be explained by the Member State in their National Programme. (fleet)	Draft COMMISSION DECISION (2008/XXX/EC) S. 35 (Appendix VI: List of Economic variables)	NP
<i>Capital costs – annual depreciation:</i> The data and estimation procedures should be explained in the National Programme. (fleet)	Draft COMMISSION DECISION (2008/XXX/EC) S. 35 (Appendix VI: List of Economic variables)	NP
<i>Value of physical capital: depreciated replacement value/ Value of physical capital: depreciated historical value:</i> The data and estimation procedures should be explained in the National Programme (fleet)	Draft COMMISSION DECISION (2008/XXX/EC) S. 35 (Appendix VI: List of Economic variables)	NP
<i>Value of quota and other fishing rights:</i> Where appropriate. Methodology for estimation to be explained in the National Programme.	Draft COMMISSION DECISION (2008/XXX/EC) S. 35 (Appendix VI: List of Economic variables)	NP
<i>Employment-: FTE national:</i> The methodology should be in accordance with the Study FISH/2005/14... (fleet)	Draft COMMISSION DECISION (2008/XXX/EC) S. 35 (Appendix VI: List of Economic variables)	NP
<i>Hours fished; Number of trips; Number of rigs, Number of fishing operations, Number of nets / Length, Number of hooks/Number of lines, Numbers of pots/traps, Soaking time:</i> Some adjustments could be proposed by Regional Coordination Meetings	Draft COMMISSION DECISION (2008/XXX/EC) S. 46 (Appendix VIII: List of transversal variables with sampling specification)	RCM
<i>Personnel cost- Imputed value of unpaid labour:</i> Chosen methodology should be explained by the Member State in their National Programme. (Aquaculture)	Draft COMMISSION DECISION (2008/XXX/EC) S. 51 (Appendix IX: List of variables for the aquaculture sector)	NP
<i>Capital costs;</i> Chosen methodology should be explained by the Member State in their National Programme. (Aquaculture)	Draft COMMISSION DECISION (2008/XXX/EC) S. 59 (Appendix IX: List of variables for the aquaculture sector)	NP

<i>Volume of sales</i> ; Conversion factors from numbers to tonnes should be stated in the National Programme (<i>Aquaculture</i>)	Draft COMMISSION DECISION (2008/XXX/EC) S. 51 (Appendix IX: List of variables for the aquaculture sector)	NP
<i>Personnel cost- Imputed value of unpaid labour</i> : Chosen methodology should be explained by the Member State in their National Programme. (<i>Processing</i>)	Draft COMMISSION DECISION (2008/XXX/EC) S. 54 (Appendix XII: List of economic variables for the processing industry sector)	NP
<i>Capital costs</i> ; Chosen methodology should be explained by the Member State in their National Programme. (<i>Processing</i>)	Draft COMMISSION DECISION (2008/XXX/EC) S. 54 (Appendix XII: List of economic variables for the processing industry sector)	NP
in any case, MS should give information on the methods that will be used to assure the quality of the estimates and on the precision that MS want to achieve. In the new guidelines for NP Proposals, Table IV.A.3 requires to identify methods to assure the quality of data. Some examples of the possible methods that can be used are provided in the guidelines (transversal / fleet).	REVIEW OF GUIDELINES FOR THE NEW DCR (SGRN-08-01); S. 7	NP
...segments with few vessels (<10) but relevant catches that cannot be reported at national level for confidentiality problems and that cannot be clustered with other national segments without creating bias. In this case, vessels might be grouped at regional level. RCM should address this situation. (→ <i>fleet</i>)	REVIEW OF GUIDELINES FOR THE NEW DCR (SGRN-08-01); S. 8	RCM
This could create some problems in estimating all the variables at the disaggregation levels required. In this case, MSs should explain these difficulties in the “non-conformity” section and could, if necessary, apply for a pilot study. (→ <i>aquaculture</i>)	REVIEW OF GUIDELINES FOR THE NEW DCR (SGRN-08-01); S. 8	NP
In the case MS stratify the population, the company size (number of employees) should be used. (→ <i>processing</i>)	REVIEW OF GUIDELINES FOR THE NEW DCR (SGRN-08-01); S. 8	NP

MS should, however, take into account the recommendations of the RCMs for their NP 2009-2010 and for their revised NP Proposal to be submitted by 31 October 2009.	REVIEW OF GUIDELINES FOR THE NEW DCR (SGRN- 08-01); S. 9	NP
Sämtliche Hinweise in den "Guidelines" ab S. 15 sind zu beachten	REVIEW OF GUIDELINES FOR THE NEW DCR (SGRN- 08-01); S. 15ff	NP

14. ANNEX 4. STOCK DATA PROBLEMS RELEVANT TO DCR

STOCK DATA PROBLEMS RELEVANT TO DATA COLLECTION REGULATION

Stock	Data Problem	How to Be addressed in DCR?	By who
Celtic Sea Cod	Discarding & High grading is poorly documented.	<p>There needs to be an evaluation of sampling levels by fleet required to get precise enough discard estimates for stock assessment.</p> <p>Most countries supply discard data to the WG but sampling levels are low and variable for the main fleets catching cod. Discard rates are also highly variable and changing in response to recruitment and management. There may be scope to develop co-operative projects with industry on self sampling, reference fleets etc.</p>	This could happen nationally or be co-ordinated through PGCCDBS or North Atlantic RCM or both
	Catch underestimated	<p>Reported landings data and “landings equivalents” since 2003 are thought to be underestimated. It may be possible to get some estimates of what true landings were from diaries or other sources. This is a major source of uncertainty in the assessment.</p> <p>PGCCDBS may be able to recommend ways of estimating uncertainty and bias in the catch data based on the results of WKACCU and WKPERCISE.</p>	PGCCDBS

Stock	Data Problem	How to Be addressed in DCR?	By who
	Maturity data not routinely collected	There is evidence from sampling on the Irish “biological survey” that maturity has changed for this stock. The new estimates change SSB by up to 20% which is significant and warrants future monitoring. There is no routine survey during Q1 to provide annual maturity estimates for this or other stocks in the Celtic Sea. Collecting maturity data from commercial fleets will probably be biased and may not be of use to the WG. RCM should consider international co-ordination of maturity sampling and whether a directed survey might be needed. Q1 catch weights might also be improved with a directed survey.	North Atlantic RCM
	Stock Identity and migration not well known	Tagging (particularly data storage), genetic, otolith microchemistry and other tools have been applied to give better understanding of the cod stock in the North Sea and Baltic. The stock structure and migration behaviour of cod in the Celtic Sea is not as well studied. This may have significant importance in developing management for the stock particularly in relation to close areas. The RCM should consider whether a regionally co-ordinated tagging programme could be developed for this stock.	North Atlantic RCM
	Two noisy survey indices. Surveys catch are very low	Surveys catch are very low. Number of station of two available surveys should be increased.	North Atlantic RCM

Stock	Data Problem	How to Be addressed in DCR?	By who
North Sea Cod	Discard data is not provided by some countries.	Some countries are not providing discard data to the working group still including Belgium, France and Sweden. There may be legitimate reason why they are not considered of good enough quality but this should be evaluated and discussed as discard rates appear to be different between countries.	PGCCDBS and North Sea RCM
	Age composition of catch is not provided by some countries	All countries with significant cod catches need to provide age composition information together with catch data. For Norway, these have not been presented in recent years.	Norway
North Sea Whiting (IV and VIId)	For around 30% of the landings discard estimates are not available. (this is also a problem for STECF)	French Discard data missing should be provided. Discard data are not provided for other countries that have significant amount of catch.	France & North Sea RCM.
Eastern Baltic cod	Unreported landings	Unreported landing is decreasing recently but still problematic for the quality of the assessment. Together with age readings inconsistencies, unreported landings are the major source of uncertainty in the assessment PGCCDBS may be able to recommend an approach to estimate uncertainty and bias in the catch based on results of WKACCU and WKPRECISE.	PGCCDBS and Baltic RCM
	Discards estimates	Discard sampling is not covered all areas. Sampling levels are low and variable.	Baltic RCM

Stock	Data Problem	How to Be addressed in DCR?	By who
	Seal and fishing interaction	<p>Since the beginning of the '90, seal predation had increased.</p> <p>Seals interaction with fishing (mainly gillnets) should be investigated</p>	Baltic RMC and PGCCDBS
	Age reading inconsistencies	<p>Although several age reading workshop were carried out in the past, there is no agreement on a standard age reading criterion between Baltic countries. A project on alternative methodologies is going on, but it seems that there is no obvious solution for this because of lack of validation for age/otolith.</p> <p>Historic length composition data should be available. A workshop devoted to compile length composition data is recommended.</p>	PGCCDBS
Western Baltic Cod	Recreational fisheries	<p>Recreational fisheries are not considered in the assessment although there are indications that recreational fisheries have a high contribution on total removals.</p> <p>A WK on recreational fisheries will be held this year. The outcome of this WK should provide recommendation on recreational fisheries sampling.</p>	Baltic RCM and PGCCDBS

Stock	Data Problem	How to Be addressed in DCR?	By who
	Solea and Havfisker surveys.	Solea and Havfisker surveys have a very small overlapping area. To combined the two surveys, as recommend the number of station need to be higher, in order to increase the overlapping area.	Baltic RCM
Kattegat cod	Discard data	Discard data is not used in assessment due to: (i) bad coverage and low sampling level; (ii) data available is not representative for annual variability in discarding. A reference fleet should be set up.	Baltic RCM
All stocks	Spatial data and information on sampling coverage and precision needs to be provided and if possible used in the assessment.	The results of COST and the new regional co-ordinated Database should help here. All countries should make an effort to populate these with the necessary retrospective data.	All countries, PGCCDBS and RCM

15. APPENDIX. DECLARATIONS OF EXPERTS

Declarations of invited experts are published on the STECF web site on <https://stecf.jrc.ec.europa.eu/home> together with the final report.

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Abstract

SGRN-09-01 met in Bilbao, Spain from 9th to 13th February 2009. The main objective of the meeting was to evaluate the National Programs (2009-2010) of Member States in relation to the new Data Collection Framework (DCF). SGRN also examined the role of data end users (namely ICES and GFCM) in the new DCF. SGRN welcomed the new developments at ICES and considers that the feedback mechanism is evolving. SGRN encourages GFCM to develop a feedback system similar to ICES.

SGRN also made recommendations on submission and review procedures for National Data Collection Programmes as well as on review of scientific surveys, under the DCF.

STECF reviewed the report during its plenary meeting 20 - 24 April 2009.

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