

The Spanish system for digitalisation of fish imports: SIGCPI

Contents

1	The need for digitalisation of the EU IUU Regulation catch certification scheme.....	2
1.1	The current regime in the EU: The limits of paper-based systems.....	2
1.2	The situation under the revision of the fisheries control system in the EU	3
2	The Spanish system: The Integrated System for the Management and Control of Illegal Fishing (SIGCPI)	4
2.1	Introduction	4
2.2	Key features of the SIGCPI system.....	4
2.3	Scope of application: registration and data capture under SIGCPI	5
2.4	SIGCPI users	6
2.5	CC and PS requirements	6
3	SIGCPI operation	6
3.1	Functionalities for importers	7
3.2	The procedure for submitting requests for access, landing and transshipment.....	7
3.3	The creation of requests by the user.....	8
3.4	Listing management.....	10
4	Control activities by public authorities: SIGCPI documentary checks.....	11
	If this checklist is completed in all of its sections, the access authorisation will be accepted. Otherwise, further levels of control will be performed by public authorities, out of the SIGCPI system.....	11
5	Conclusions and recommendations	11
5.1	Conclusions.....	11
5.2	Recommendations for Spain	12
5.3	Recommendations for the Commission	12

1 The need for digitalisation of the EU IUU Regulation catch certification scheme

1.1 The current regime in the EU: The limits of paper-based systems

The catch certification scheme to improve traceability for the importation and exportation of all fishery products within the European Union (EU) is one of the cornerstones of the EU IUU Regulation aimed at eliminating illegal, unreported and unregulated (IUU) fishing.¹

In order to ensure that the importation into the EU of fishery products is not from sources connected to IUU fishing, fishery products need to be accompanied by a catch certificate (CC). Catch certificates include information related to where, when and how the catch was made.² They are issued by the country where the fishing vessel that made the catch is registered and certify that catches have been made in accordance with applicable laws, regulations and international conservation and management measures.³

Currently, the EU IUU Regulation provides a framework for how these CC should be processed. However, whether Member States choose to control these CC using actual paper or a complex IT system remains a decision for each Member State. Indeed, the EU IUU Regulation stipulates that “the catch certificate may be established, validated or submitted by electronic means or be replaced by electronic traceability systems ensuring the same level of control by Member States’ authorities”.⁴ As a consequence, Member States have implemented different systems and are at different stages of their digitalisation process. While some Member States, such as Spain, the Netherlands or Germany use digitalised systems, others rely on paper-based controls and cross-checks of CC.⁵

There is a need for paper-based CC schemes to be replaced by a more modern digital system. This is not only obvious in the current digital era that we live in, but more importantly, there are a number of risks associated with continuing to use a paper-based system. The first one is the overuse of a specific CC, where multiple fish consignments⁶ attempt to use the same CC, thus exceeding the weight of the original document.⁷ Without a centralised system that captures and reconciles the CC with the actual consignment, fraud may happen. This is even truer when seafood products are processed in different

¹ Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999 (OJ L 286, 29.10.2008, p.1. On: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1408984470270&uri=CELEX:02008R1005-20110309>

² Annex II of the IUU Regulation contains all the information that CC should include.

³ See Article 12.2.3 of the IUU Regulation.

⁴ Article 12.4 of the IUU Regulation.

⁵ The Environmental Justice Foundation, Oceana, the Pew Charitable Trusts and WWF. *Modernisation of the EU IUU Regulation Catch Certificate System*. On: <http://www.iuuwatch.eu/wp-content/uploads/2016/07/Modernisation-FINAL.pdf>. P4

⁶ Article 2.23 of the IUU Regulation: ‘consignment’ means products (in this case fishery products) which are either sent simultaneously from one exporter to one consignee or covered by a single transport document covering their shipment from the exporter to the consignee.

⁷ For information on case studies, see: The Environmental Justice Foundation, Oceana, the Pew Charitable Trusts and WWF. *Improving performance in the fight against illegal, unreported and unregulated (IUU) fishing. Case studies highlighting the need for improved implementation of the EU IUU Reg CC scheme*. On: <http://www.iuuwatch.eu/wp-content/uploads/2017/01/MOD-CASE-STUDY-Revised-7.pdf>

countries. The second major risk is associated with the lack of level playing field between authorities and operators in the EU, with some countries being submitted to more thorough checks, whilst others less so. This could foster a situation where unscrupulous operators would seek entry points in the EU market with fewer controls. Thirdly, without a centralised database, there is less opportunity to carry out a thorough risk analysis and the identification relies on the inspectors' ability to detect risky consignments that are being imported.⁸

As a result, one of the key elements commonly accepted by the EU Institutions and Member States to improve the effectiveness of the current catch certification scheme is moving from a paper-based system to the implementation of a modern EU-wide digitalised system. This will increase traceability, ensure better monitoring of CC, help avoid risks of IUU fishery product laundering, reduce possible document fraud,⁹ and in general, help to standardise the control of fish imports across the EU and prevent IUU imports from entering the EU market.

1.2 The situation under the revision of the fisheries control system in the EU

In the Communication of 2015 on the application of EU IUU Regulation,¹⁰ the Commission found it necessary to make some significant technical improvements to the catch certification scheme by creating an EU-wide database aimed at centralising information from CC, and in turn having better cross-checking of these documents. In May 2019, the Commission launched CATCH.

CATCH is an IT system, built on TRACES.NT,¹¹ the digital management tool for importation of animals, plants and food, used across the EU by Member States and third countries looking to export to the EU. It is a web-based application for use at the Member State level and at the EU level to support the management of CC, processing statements (PS), importer declarations as well as risk tools, and to automate their associated issuance, control and verification procedures.¹² CATCH is already working and available for use by Member States.¹³

Through its proposal to revise the EU Fisheries Control System,¹⁴ the Commission has proposed to make the use of the CATCH system mandatory. Once this legal precept comes into force, which is

⁸ For more information on case studies, see: The Environmental Justice Foundation, Oceana, the Pew Charitable Trusts and WWF: *Improving performance in the fight against illegal, unreported and unregulated (IUU) fishing Case studies highlighting the need for improved implementation of the EU IUU Regulation Catch Certificate (CC) Scheme*. On: <http://www.iuuwatch.eu/wp-content/uploads/2017/01/MOD-CASE-STUDY-Revised-7.pdf>

⁹ Communication from the Commission to the European Parliament and the Council. *On the application of Council Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing*. Brussels, 1.10.2015. COM(2015) 480 final. On: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52015DC0480&from=EN>

¹⁰ *Idem*.

¹¹ For more information on TRACES.NT, see: <https://webgate.ec.europa.eu/tracesnt/login>

¹² European Commission. *CATCH – Information note*. P.1. On: https://ec.europa.eu/fisheries/sites/fisheries/files/docs/body/catch-it-system_en.pdf

¹³ Although CATCH was launched on May 2019, by the drafting of the current report, no Member State (or economic operator) has started to use it in a voluntary basis.

¹⁴ Amendment of Article 12 of the EU IUU Regulation on the Proposal for a Regulation of the European Parliament and of The Council amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control. COM/2018/368 final. On: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018PC0368>

expected to be two to five years after the adoption of the proposal, CATCH will be made mandatory for both Member States and economic operators.

Given the planned period for implementation, we think Member States should start using the CATCH system on a voluntary basis.

2 The Spanish system: The Integrated System for the Management and Control of Illegal Fishing (SIGCPI)

2.1 Introduction

Spain has an IT system to control fish imports, called the Integrated System for the Management and Control of Illegal Fishing (SIGCPI). It is the Spanish government's response to the need for increased efficiency and control efforts associated with imported fish from third countries. Introduced in 2010, this system follows the provision for the need to have an efficient import control system, as mentioned in the EU IUU Regulation¹⁵ and the ensuing provisions in the Spanish law.¹⁶

More recently, a new functionality is being implemented, to link it with the Single Customs Window (VUA),^{17,18} which centralises all the documentation sent by economic operators related to imports, avoiding duplication of controls by the different authorities. If this initiative succeeds, the next step will imply the existence of a single window for Health/GSF¹⁹/CITES so that all the different controls to which an import is subject to, are centralised.

2.2 Key features of the SIGCPI system

- **SIGCPI is a digitalised “request for import” system.** It is the import request and not the CC that is digitised. However, in the process of the request the information in the CC is digitised. The Spanish system is interconnected with customs, through which all import request applications must go. Customs automatically receives the validation of the imports.
- **SIGCPI is an electronic and digitised database.** SIGCPI is an import application system that allows the processing of CC and PS as well as the digitalisation of the data by its entry into the

¹⁵ Article 14.4 of the IUU Regulation.

¹⁶ Order ARM/3522/2009, of December 23, 2009, regulating the procedure of access control to Spanish ports for fishing vessels from third countries, and the import and export of fishery products to prevent, discourage and eliminate illegal, unreported and unregulated fishing. Original (in Spanish): Orden ARM/3522/2009, de 23 de diciembre, por la que se regula el procedimiento de control de acceso a puertos españoles de buques pesqueros de terceros países, y la importación y exportación de productos de la pesca para prevenir, desalentar y eliminar la pesca ilegal, no declarada y no reglamentada. On: <http://extwprlegs1.fao.org/docs/pdf/spa91712.pdf>

¹⁷ The Single Customs Window (VUA) was launched by the Spanish Tax Agency to allow import control procedures carried out by operators to be grouped together, shortening processing times and deadlines. The controls of imports are carried out at the same time and place, avoiding the costs and time involved in having imports subjected to examinations on more than one occasion. On:

https://www.agenciatributaria.es/AEAT.internet/Inicio/La_Agencia_Tributaria/Aduanas_e_Impuestos_Especiales/ Presentacion/Procedimientos_y_gestiones_en_la_Aduana/ Ventanilla_Unica_Aduanera / Ventanilla_Unica_Aduanera_.shtml

¹⁸ Spain. *Biennial reporting on the application of the IUU Regulation. Reporting period 2018-2019.* Section 2.3.

¹⁹ GSF is the General Secretariat of Fisheries (“Secretaría General de Pesca”) within the Ministry of Agriculture, Fisheries and Food.

database. However, there is no automatic data cross-check in the system or connection with data from other Member States or third countries.

- **SIGCPI does not include an automatic risk analysis tool.** This would allow the State to identify the risks that must be taken into account to detect items with a high risk of coming from IUU fishing. In the case of the SIGCPI, the analysis is carried out manually by the fisheries inspectors.
- **SIGCPI is not currently compatible with "CATCH".** The system is not compatible and is not designed to allow cross-checks of information at EU level and transfer of information into CATCH.
- **SIGCPI does not mean the end of paper-based systems.** CC are still paper-based. CC need to be printed out prior to the manual entry of data into the system, even when the CC comes from a country such as the USA or Canada that have fully digitised systems. The aspiration would be for third countries to issue CC directly in digital format, to really put an end to paper-based systems.

2.3 Scope of application: registration and data capture under SIGCPI

SIGCPI controls 100% of the CC and PS regardless of the way in which the imports take place (sea, air, land). The application is designed for the registration and control of:²⁰

- CC and PS for the authorisation of fish imports
- Transit operations of fishery products to another Member State
- Operations of access to port services, landing and transshipment operations by third country fishing vessels
- Indirect imports²¹ accompanied by a PS and a copy of the CC
- Re-export operations of previously imported fishery products

The information required includes:²²

- Scanned copies of the CC, PS, bill of landing, or transport document and sanitary certificate and swordfish or bigeye statistical document²³
- Name and address of the importer, the agent and the exporter
- CC number as well as the country that validated the CC
- Name of the vessel that made the capture, its registration number and its flag State
- Species (Code AL3) and area of catch (FAO code)

²⁰ Spain. *Biennial reporting on the application of the IUU Regulation. Reporting period 2018-2019*. Section 4.5.

²¹ Indirect importation means the importation from the territory of a third country other than the flag State of the fishing vessel responsible for the catch. See Article 2.12 of the IUU Regulation. Also, indirect importation requirements are set in Article 14 of the IUU Regulation.

²² General Secretariat of Fisheries. *Manual de uso del sistema integrado de gestión para el control de la pesca INDNR (SIGCPI)*. Versión 3.1.11/02/2015. P.17

²³ According to the obligation of a statistical document for import of bluefin tuna, swordfish and bigeye tuna. This obligation comes from the International Commission for the Conservation of Atlantic Tunas (ICCAT) recommendation, approved by the Indian Ocean Tuna Commission (IOTC) and stated in Council Regulation (EC) No 1984/2003 of 8 April 2003 introducing a system for the statistical monitoring of trade in bluefin tuna, swordfish and bigeye tuna within the Community. On: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32003R1984&qid=1607093732994&from=ES>

- Quantity of products, their presentation (i.e. if they are fresh or frozen), their conservation and Combined Nomenclature code (CN code)
- Transport details (container registration, flight number, truck registration, vessel name, etc.)
- Country of export
- Expected date of arrival of the products in Spain
- Point of entry
- Location of goods
- Date of receipt of the application for import authorisation

2.4 SIGCPI users

The users of the SIGCPI system are:

- Economic operators – the importers and exporters operating in Spain. They are competent to carry out the requests in the application and will have to initiate them for the proposed imports of fishery products.
- SIGCPI personnel – the operators and coordinators of the SIGCPI application. They are coordinated by the members of the General Sub-directorate for Fisheries Surveillance and the Fight Against Illegal Fishing from the General Secretariat of Fisheries (GSF).²⁴ The GSF uses the system to validate the information submitted for pre-configured listings. In order to use the system efficiently, the system allows to configure listings of vessels and economic operators, but these have to be validated by authorities in order to then be used by the operator. This is usually a prerequisite to the use of the request function of the system by the operator. The GSF is able to access all the information related to consignments that are being imported.

2.5 CC and PS requirements

The SIGCPI system requires the user to use a CC or a PS when importing a product from a third country or exporting from Spain to a third country. This is one of the major advantages of the system, prompting the user to attach the original copy of the CC or the PS to all requests that are made.

At the stage of creating a new import request, the user will then be able to create ‘lots’ for each product imported. The first thing the system asks the user to do is to attach a CC and then to fill in additional information related to that CC.

3 SIGCPI operation²⁵

²⁴ The General Secretariat of Fisheries (“Secretaría General de Pesca”) within the Ministry of Agriculture, Fisheries and Food is the only Spanish authority designated to perform functions in connection with the IUU Regulation. It is competent for the control and implementation of fisheries laws and for developing national rules on the management of the fishing sector. See: Royal Decree 430/2020, of 3 March, which develops the basic organic structure of the Ministry of Agriculture, Fisheries and Food. On: https://www.boe.es/diario_boe/txt.php?id=BOE-A-2020-3228

²⁵ To complement this information see: General Secretariat of Fisheries. *Manual de uso del sistema integrado de gestión para el control de la pesca INDNR (SIGCPI)*. Versión 3.1.11/02/2015. On:

3.1 Functionalities for importers

The SIGCPI system offers its users a range of uploadable operations and processes, which we will call activities from here onwards. These require input from the user at different stages of the underlying activity. Generally, these activities can be divided into two categories: management of listings and management of requests. Each category then allows a range of activities as described below.

1. **Management of pre-configured listings for the system user.** This step is often necessary for the user to access all the request functionalities (listed in section 3.4 below) of the system. These listings can be updated as and when the operator needs. Two types of listings can be updated by the user:
 - Information on the vessel that caught the fish relevant to the request, and whether to store this information for future reference. When a user starts a new request (as listed below), the system will ask them to select from information he has preconfigured in this step in a drop down menu.
 - Information on the economic operator as well as the details of business partners. When a user starts a new request (as listed below), the system will ask him to select from information he has preconfigured in this step in a drop down menu.
2. **Management of requests that need to be authorised by the GSF.** This step allows for the user to open a request for different categories, such as direct or indirect importations, transshipments, landings, transit or reexportation.

3.2 The procedure for submitting requests for access, landing and transshipment

Through SIGCPI, the economic operators open an application file in which they present the necessary documentation, at least three working days before the estimated time of arrival at the port of the imported fish consignment.

For a vessel to access a port or for the landing or transshipment of the catches of a third country vessel, the following documentation must be attached:

- The prior notification form, which must include information on, *inter alia*: identification of the vessel, name of the designated port of destination, purpose of the stop, fishing authorisation, dates of the trip, date and estimated time of arrival at port, quantities of each species on board, areas of capture, quantities to be unloaded or transshipped.

- In cases where the third-country fishing vessel has fishing products on board that come from EU vessels, the applicant must submit documentation proving the EU origin of the goods (as indicated in the Union Customs Code).²⁶
- In the case of indirect imports, in addition to a copy of the CC, the importer must present the documents required in Article 14.1 b) of the IUU Regulation.

If there are doubts, additional information might be requested, such as: fishing licences, transshipment documents, private transport documents (bill of landing, airway bill, CMR,²⁷ etc.) and/or any other documentation considered of interest to ensure the traceability of products (Veterinary Certificate for the EU, invoices, delivery notes, storage plans etc.).

3.3 The creation of requests by the user

3.3.1 Import

In order for the importer to be able to send a request to the GSF, the following steps must be followed:

1. Start a request for importation. This step will ask the user to enter information about the exporter, the importer, information about the business (company name, tax identification number, contact details). Information on the exporting country and the country of provenance is also requested as well as information on the type of transport used to move the merchandise and where it is entering the country.
2. Once the importation request has been created, the user is asked to create the lots that are associated with his request. This is divided into two steps:
 - a. Upload of the scanned catch certificate. This is a necessary step for the user to be able to continue.
 - b. Capturing information on the nature of the catch (including species, CN Code,²⁸ weight etc.)
 - c. In case the species entered is either swordfish or bigeye tuna, a statistical document needs to be attached, otherwise the system does not allow the user to submit the request to the GSF
 - d. In the case of indirect imports, where the fish has been processed or transited through another country, the user will have to attach the processing statement or the unique transport document.

²⁶ Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code. On: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32013R0952>

²⁷ CMR is the Convention on the Contract for the International Carriage of Goods by Road, used for all transport of goods by lorry.

²⁸ CN code is a customs/tariff designation required in box 13 of export certificates for the EU.

See: Regulation (EU) No 952/2013 Of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code. On:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32013R0952&qid=1607095489778>

3.3.2 Access to services

This option is available for ships that wish to land their catch. The nature of the information required by the system will depend on the ship's characteristics. The steps are:

1. Enter all the ship's information in the system, including general information data, authorisations, contact of shipowner and ship managers.
2. Creation of lot(s) as mentioned in point 2 above.

3.3.3 Transshipment request and landing authorisation

In both these operations, the user will have to :

1. Upload information on the transshipment request and the previous notification. As with access to services, the information required will depend on the nature of the vessel. However, in the case of a landing request, if the user does not have a catch certificate that accompanies the request, the only permitted landing destinations are the customs deposit or the container. If it has a CC , the product can enter the market (subject to authorisation from the GSF).
2. Once this step is done, the user can enter the products lines for the created lots in the same way as in point 2 above.

3.3.4 Transit and indirect transit

The user starts by entering all the information associated with the nature of the transit. This will include information about the exporter and the importer, details on the origin, journey, entry point and destination of the transiting products and details about the next steps before the products reach their destination.

The user then enters the information about the lots and needs to attach the catch certificate. In this case however, the user will not need to enter the details about the product lines.

In the case of indirect transit, the user will have to select either the processing statement or the single transport document.

3.3.5 Re-exportation

In the case of operators importing fish products destined to be processed and re-exported, the user will have to fill in a re-exportation request. The required information includes general information about the involved parties (exporter and recipient), the applicant (which would be the operator in Spain), the recipient country, information about the export and the type of transport that will be used to transfer the goods.

As in most operations, the user then has to attach the catch certificate and give details on the product lines associated with the lots.

3.3.6 Submission of requests to the GSF

In order to submit a request to the GSF, the user must be an existing user in the system. Once the necessary steps corresponding to the relevant activity (direct and indirect import, access to services,

transshipment and landing, transit and indirect transit, re-export) have been followed, the user can submit the application to the GSF by clicking the “send request” button.

The user can also check the status of the request in the system at any time, which indicates either that the request is still pending or is resolved.

3.4 Listing management

3.4.1 Vessel list

In order to adequately use the system and select the vessels associated with the different requests, the user must upload detailed information about the vessels. This information includes:

- Vessel type
- Flag
- Name
- Registration number
- IMO/Lloyds code
- Call sign
- Country of base port
- Base port
- Contact information
- Registration certificate
- Regional Fisheries Organisation (National, RFMO, none)
- Type of the vessel monitoring system (VMS)²⁹
- Total length
- Ship width
- Hull size

The user will also be able to edit this list as needed.

3.4.2 Operator list

In order to use the system adequately, as an authorised operator, the user must provide details on the company that is submitting the requests. This information includes:

- Name of business
- Name and surname
- Tax identification number
- Telephone, email
- Country
- Address

²⁹ The vessel monitoring system (VMS) is a satellite-based monitoring system, which at regular intervals, provides data to the fisheries authorities on the location, course and speed of vessels. For more information, check: https://ec.europa.eu/fisheries/cfp/control/technologies/vms_en

4 Control activities by public authorities: SIGCPI documentary checks³⁰

The personnel of the GSF must carry out documentary checks on 100% of the import authorisation applications received, which implies checking 100% of the CC and PS.

To this end, before issuing an authorisation, it is mandatory that the person operating the system and the requests (the GSF operator), responsible for processing and controlling the information, completes a checklist. If this checklist is not rigorously followed, the system does not allow the authorisation to be sent electronically. In this sense, the SIGCPI system, together with the staff that operate it, forms the first filter of the risk analysis.

This documentation that is attached to application is examined by the operators of the SIGCPI application to ensure:

- The documents are valid, there are no missing data and the existing data are consistent. All fields of the CC and PS are checked. If this is not validated by the operators of the SIGCPI, users should modify their requests.
- The requested port is within the designated ports for this operation.
- The fishing vessel and goods are not included as an alert according to the Spanish internal risk analysis criteria.

If this checklist is completed in all of its sections, the access authorisation will be accepted. Otherwise, further levels of control will be performed by public authorities, out of the SIGCPI system, such as the control by the IUU Intelligence Team or the physical inspection of the vessel by the fisheries inspectors. In case of evidence of a third country fishing vessel's involvement in IUU fishing, the authorisation to land or tranship the catches will be denied and an ensuing verification will be carried out with the flag State.

These investigations may also require the use of the system for mutual assistance with the Commission and third countries³¹ and/or collaboration with the Autonomous Communities, the Customs departments, national and international security forces and/or the Foreign Service.

5 Conclusions and recommendations

5.1 Conclusions

Spain has committed, since the initial implementation phase of the EU IUU Regulation, to the design, use and development of an IT tool for the digitalisation of fish imports (SIGCPI) and has maintained over the years its commitment to developing a thorough system.

³⁰ Spain. *Biennial reporting on the application of the IUU Regulation. Reporting period 2018-2019*. Section 4.5.

³¹ According to Article 51 from the IUU Regulation: "The administrative authorities responsible for implementation of this Regulation in the Member States shall cooperate with each other, with administrative authorities of third countries and with the Commission in order to ensure compliance with this Regulation".

SIGCPI is an electronic and digitised database for fish imports that allows the processing, digitalisation and control of 100% of CC and PS but it presents some limits. Indeed, the SIGCPI is not an EU-wide database and is not connected with other MS's systems. For this reason, the SIGCPI does not sufficiently prevent the use of the same CC for different imports in different Member States.

In addition, it does not incorporate an automated and thorough risk analysis tool, which could speed up the process, and make it possible to better target the verification of documents produced by the third country and customs inspections.

To overcome these limitations, the use of CATCH is the only way to have an EU-wide data base IT system for digitalisation of CC that allows authorities to share and cross-reference the CC required for every consignment of fishery products entering the EU and the development of an integrated risk analysis tool.

A single database would:

- Prevent fraud using a catch certificate for several imports in different Member States.
- Allow risk analysis on all imports instead of risk analysis by Member States.
- Facilitate the transmission of information between Member States.

5.2 Recommendations for Spain

- Continue to show the same high level of commitment and improve SIGCPI whenever necessary and possible.
- Continue to lead the fight against IUU fishing and encourage the EU and the other Member States to support the Commission on making the use of CATCH mandatory, through the revision of the EU Fisheries Control System.
- Capitalise on its experience and become a true lever for change in the EU by using CATCH on a voluntary basis, starting in 2021.
- Continue providing the GSF with more human and material resources so that it can continue, through the Sub-Directorate of Control and Inspection, to effectively control fish imports through SIGCPI, and ensure effective implementation of the above.

5.3 Recommendations for the Commission

- Encourage the use of CATCH on a voluntary basis before it becomes mandatory.
- Given the accumulated, valuable experience of Member States who already have a digitised system, the Commission should develop the frequency of trainings and seminars so that Member States and different stakeholders can share lessons learned on digitalisation. This would help improve the CATCH system so that it truly becomes the preferred system not only by the Member States, but also by all regular users, such as seafood companies.
- Provide DG Mare with more resources for the implementation of CATCH and related actions for its success, such as training for Member States' personnel and non-EU countries.

Nieves Noval

Lawyer, Ocean Team, Sustainable Seafood Project

nnoval@clientearth.org

www.clientearth.org

Quentin Marchais

Sustainable Seafood Project Lead

qmarchais@clientearth.org

www.clientearth.org