



The control of the Landing Obligation in Spain

A report by



for ClientEarth.



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Key findings

- Spain reports no infringements of the landing obligation for 2017 and 2018. It reports very low catches and landings of fish below the minimum conservation reference size and very low discards under the allowed exemptions. All of this indicates the need for a far greater focus on monitoring and control by the competent authorities.
- Opposition, resistance and a sense of denial towards the landing obligation from the fishing industry is seen by Spain as a difficulty for the implementation of the landing obligation, leading to possible inaccuracies in reporting. Spain should make increased efforts to ensure better reporting and that fishers are aware of the benefits resulting from the landing obligation.
- Spanish authorities are making efforts to improve the selectivity of fishing gear. They also say they are committed to using specific monitoring techniques such as closed-circuit television and drones to control the landing obligation. These moves are welcome and should be further developed.
- Spain must increase transparency on data concerning the implementation of the landing obligation to ensure its effective control and improvement.



1. Introduction

The Common Fisheries Policy (CFP) has its origin in the Treaty of Rome of 1957. Initially it was linked to the Common Agricultural Policy, however, the need to establish an independent fisheries policy grew throughout the European Economic Community (EEC) enlargement negotiations as the countries that joined had significant fishing fleets.² The adoption of the first relevant regulations for the CFP took place in 1970.³ In 1983 the pressure of a new enlargement – with the accession of Portugal and Spain, both with significant fishing fleets – forced Member States to reach an agreement on the management of fisheries. That same year, the first regulation formally establishing the CFP was adopted.⁴

The CFP was reformed in 1992 with the objective of alleviating the problems caused by a fleet capacity that far exceeded sustainable catch possibilities.⁵ However, the measures included were not enough to put a stop to overfishing and the decline of fish stocks continued. This caused the CFP to be reformed again in 2002 to address the social and environmental dimensions of fisheries.⁶ This reform did not avoid the deterioration of certain fish stocks.

In addition, from the mid-2000s the problem of discarding had become one of the most prominent issues undermining the effectiveness and credibility of the CFP. It was agreed that a major reform to improve the CFP was necessary to ensure the preservation of marine resources, increase the competitiveness of European fishing fleets and reduce unsustainable fishing practices. The latest reform of the CFP was adopted in 2013.⁷

One of its milestones was the introduction of the landing obligation⁸ with the objective of reducing and avoiding unwanted catches and discards. This obligation has important implications, especially in those countries with large fishing fleets, such as Spain.

However, to guarantee that the landing obligation serves its purpose it is crucial to ensure its effective implementation. In this regard, the European Commission has recently acknowledged that compliance with the landing obligation is generally weak, especially with regards to its control and enforcement.⁹ The aim of this report is to analyse how the landing obligation is being implemented in Spain and build awareness about the importance of monitoring, control and enforcement as tools to facilitate and guarantee effective implementation. This report is divided into three parts. The first part introduces the landing obligation and its implications. The second part examines how it has been implemented in Spain, with special emphasis on the years 2017 and 2018. Finally, a set of conclusions and recommendations are presented.

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2. The Landing Obligation

Unwanted catches and discards are a substantial waste and negatively affect the sustainable exploitation of marine biological resources and ecosystems.¹⁰ Traditionally, discards have been mainly driven by economic reasons i.e. when fish have no or low economic value, when they are too small, when there are quota restrictions and/or when fish are damaged.¹¹ Unwanted catches contribute to the exploitation of fish stocks beyond levels which would allow them to recover above biomass levels capable of producing the maximum sustainable yield,¹² as required by Article 2(2) of the CFP basic regulation.¹³ For this reason, the 2013 reform of the CFP introduced the landing obligation which provides that all catches of species subject to catch limits and, in the Mediterranean, also species subject to minimum size restrictions, must be retained on board, recorded, brought to land and deducted from applicable quotas, unless exemptions apply (as discussed below). It applies to all vessels within European Union (EU) waters and to EU vessels in international waters.

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The landing obligation was designed to be phased in gradually over a 4-year period, starting from 1 January 2015 until 1 January 2019. Over the same period, fishing quotas have been expanded – ‘topped-up’ – to make allowance for the landing of fish that previously would have been discarded. However this means that imperfect implementation of the landing obligation has serious consequences for the sustainability of fishing quotas: if discarding continues, in breach of the landing obligation, then the extra ‘top-up’ to Total Allowable Catch (TAC) levels is not filled by the landing of catches that previously would have been discarded, (leaving overall catch numbers unchanged): it is filled by additional catches, above the agreed sustainable level. The integrity of fishing quotas is thereby undermined.

The landing obligation also includes specific exemptions and flexibility mechanisms with the objective of facilitating its implementation. According to these exemptions, fish can be discarded if (i) fishing of that species is prohibited, (ii) the species has a high survival rate after being discarded, (iii) they fall under the *de minimis* exemption,¹⁴ or (iv) they are damaged by predators.¹⁵

The exemptions by sea area, fisheries and species are based on joint recommendations prepared by regional groups of Member States in consultation with the relevant Advisory Councils.¹⁶ These are then sent to the Scientific, Technical and Economic Committee for Fisheries (STECF)¹⁷ which analyses them based on available scientific data.¹⁸ The European Commission then adopts a discard plan by means of a delegated act, based on these joint recommendations and STECF’s evaluation thereof. These plans have a maximum duration of three years. The lack of alignment between discard plans and multiannual plans¹⁹ has been heavily criticised by relevant stakeholders in the field.²⁰

There are also flexibility mechanisms to support the implementation of the landing obligation, such as the inter-species or inter-annual flexibility mechanisms.²¹ All catches which fall under an exemption or a flexibility mechanism, and all discards, must be recorded in the logbook – where masters of fishing vessels must keep a record of fishing operations. Non-compliance with the landing obligation is considered a serious infringement under the European Fisheries Control Regulation.²²

The Commission is required to produce an annual report on the implementation of the landing obligation across the EU, based on annual reports submitted by Member States. These reports provide useful insights into the progress of the implementation of the landing obligation, although the quality and level of detail of the various reports submitted by individual Member States is highly variable across Member States and years, making it difficult to systematically assess the landing obligation’s implementation.

3. The case of Spain

Spain has one of the largest fishing fleets in the EU. According to the latest available data, in 2017 it was the largest in terms of capacity (gross tonnage), representing 21.2% of the overall EU fleet. In terms of engine power, it was the third largest, after Italy and France and the second largest in terms of number of vessels, after Portugal. The large majority of Spanish vessels – around 65% – were from the Autonomous Communities (AA. CC)²³ of Galicia and Andalucía. Spain was also the country with the highest volume of catches. In 2017, the total catches of the EU-28 amounted to 5.3 million tonnes, of which 17.7% were from Spanish vessels. It was also the country with the highest volume of exports²⁴ – almost 1.2 million tonnes in 2017. Therefore, the significance of the Spanish fisheries sector within the EU is undeniable.

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3.1 Steps taken to comply with the Landing Obligation²⁶

The landing obligation in Spain is regulated through EU regulations, which are directly applicable. These include several delegated acts for pelagic and demersal fisheries. The Ministry for Agriculture, Fisheries and Food (MAFF) also passed a Ministerial Order in April 2019 which sets out rules for the implementation of exemptions to the landing obligation and for increasing the selectivity of the fishing gear used²⁶ (MO of April 2019). In addition it is working on a Royal Decree to regulate the marketing of fisheries products subject to the landing obligation.²⁷

According to information provided by Spain to the European Commission for the years 2017 and 2018, Spain has played an active role in facilitating greater public awareness and the implementation of the landing obligation. Examples of this include:

- The publication of guidelines on how the LO should be implemented in North Western Waters (NWW),²⁸ South Western Waters (SWW)²⁹ and in the Mediterranean.³⁰ These guidelines contain information on the exemptions applicable by species, fishing gear and subarea, on the available flexibility mechanisms, on the minimum conservation reference size (MCRS) for each species and on the species considered to have high prospects of survival after being discarded. The MAFF has also elaborated other documents and has held information sessions with the aim of contributing to the implementation of the landing obligation. These have been directed at fisheries inspectors, fishers, staff from ports and fish markets, NGOs, scientists and other relevant stakeholders.

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- Its involvement in several studies to improve the implementation of the landing obligation e.g. selectivity studies, studies regarding high survivability and studies to measure discard rates as well as the impacts of the landing obligation in different fleets, among others. These studies have been directed towards bottom trawl fisheries as this is where the main “choke” problems³¹ exist. The best results from selectivity studies undertaken by AZTI – a technology centre specialising in marine and foodstuff research – and the Spanish Institute of Oceanography (IEO) – a public research organisation dedicated to research in marine science - have led the MAFF to adopt the obligation to use specific fishing gear from July 2020 for all bottom trawlers which are operating in certain areas of the North-East Atlantic³². This will contribute to improving the selectivity of trawl gear and reducing unwanted catches. Bottom trawlers can voluntarily start using this gear from 2019 and can opt for financial aid to do so.
- Changes in the quota management system to allow the recording of discards under the *de minimis* exemption.
- Participation in the regional groups of the NWW and SWW to address potential choke situations. It has also participated in the regional group for the Mediterranean.

Another relevant initiative carried out by Spain has been the creation of the Mesa Estatal de Descartes, inaugurated by the former Ministry of Agriculture, Food and Environment in 2015. This body was created with the intention of making decisions in a participatory and coordinated way to facilitate the implementation of the landing obligation. Three working groups were established: NWW, SWW and Mediterranean. Stakeholders from all relevant sectors were represented i.e. industry, public administration, NGOs and scientists. Despite the positive initiative, there have been periods of time when meetings of this body or its working groups have been scarcely convened, putting into question the participatory nature of decision-making with regards to the landing obligation.

3.2 Control and enforcement of the Landing Obligation: current state of play

Even though Spain has made efforts to spread information on the landing obligation to facilitate its implementation, access to up-to-date information on how the landing obligation is being implemented in practice or how it is being monitored and controlled is scarce and hard to obtain.

Reports for 2017 and 2018 sent by Spain to the Commission highlight that Spain has continued to put effort into the control and monitoring of the landing obligation. Spain reports it has increased aerial surveillance and inspections at sea and at port. However, there is consensus among actors in fisheries control that these are not sufficiently effective tools to ensure that the landing obligation is complied with.³³ This is seen in the fact that Spain does not report any infringements of the landing obligation in the annual reports sent to the Commission for 2017 and 2018 and reports very low catches and landings of fish below the MCRS as well as very low discards under the exemptions applicable; far lower than would be expected given the estimated catch that formerly would have been discarded and the evidence provided to support the need for the use of exemptions to the landing obligation.

Spain's report on the landing obligation in 2017 shows that it had precise information neither for discards nor for landings of undersized fish. One of the difficulties the report highlights is that the existing electronic and paper-based logbook did not have specific entries to include information on below-MCRS discards or catches.

In 2018, once the electronic recording system was improved, quantitative information on the use of exemptions – only *de minimis* and damaged by predator – and the inter-annual flexibility mechanism was provided. However, figures on the use of the *de minimis* exemption were generally low and it must be doubted that they reflect the true quantity. In addition, figures for catches below MCRS were not provided, even though according to the CFP Basic Regulation³⁴ such catches need to be stored, recorded and reported separately, since they are not for human consumption. This highlights that **although better developed data entry systems contribute to the control of the landing obligation, they are not enough to ensure it is being properly enforced as the veracity of data introduced depends on the full co-operation of the fishing sector.**



Opposition, resistance and a sense of denial towards the landing obligation from the fishing industry has been highlighted as a difficulty by Spain in its landing obligation reports to the Commission for 2017 and 2018 as well as by other stakeholders whose views have been considered for the elaboration of this report.

The fact that quantities of discards and unwanted catches being recorded in logbooks of Spanish fishing vessels is non-existent or extremely low conveys an additional problem. Exemptions and flexibility mechanisms are granted to provide flexibility in the system to better adjust catch compositions and fishing opportunities, without prejudice to ecological and economic sustainability. However, the STECF warns that if there are no records of discards under these exemptions it could mean that, in practice, they are being **used to legally increase catches well above intended levels. If this is the case, the use of these exemptions will require careful consideration.**

Another significant change that the implementation of the landing obligation has brought has been the obligation to land catches below MCRS – unless there is a *de minimis* exemption applicable, in which case there is an obligation to discard.

Once landed, they cannot be used for direct human consumption.³⁵ Information on the use and final destination of these catches has not been provided by Spain. In addition, the obligation to land catches below MCRS and the prohibition on using them for human consumption could lead to a deliberate increase of these catches for use in fattening farms.

In relation to the above, another measure which would contribute to the proper implementation of the landing obligation would be the **adaptation of port infrastructure to accommodate a greater number of landings.** This should be done by the State in collaboration with AA. CC

One of the main difficulties associated with the implementation of the landing obligation is the issue of choke species – a problem (introduced above) which arises mostly in mixed fisheries. Spain is involved in specific studies and pilot projects to test selective gears. In addition, the implementation of other technical measures (e.g. real-time closures or swaps of quota with other Member States) have proved to be powerful tools to mitigate this problem and will continue to be used or even increase.³⁶ However, Advisory Councils have identified a significant number of fisheries that will have residual choke problems even after all available mitigation measures are applied.³⁷ **Relevant stakeholders must continue to work collaboratively towards finding ways to solve this problem.**



4. Conclusions and Recommendations

The landing obligation was adopted with a view to reducing and avoiding discards and unwanted catches, which in turn would contribute to the conservation of marine resources and the viability of the fishing sector. Today, nine months after the landing obligation entered fully into force – and years after it become law – many deficiencies in its implementation remain.

For the landing obligation to prove successful a significant change in fishing practice at sea needs to take place. To contribute to this, modifications need to be adopted from a policy, technical and control point of view to ensure unwanted catches are reduced and all catches and discards falling under applicable exemptions are fully accounted for. In the case of Spain several measures have been identified which could contribute to improving the control and enforcement of the landing obligation:

- Compliance with the landing obligation and discarding rules requires a far greater focus on monitoring and control by competent authorities, not only in ports, where catches are landed, but also over those fishing activities taking place at sea. Although Spain reported to the Commission in 2018 that it had participated in pilot projects with drones for fishing control and was planning to start using closed-circuit television (CCTV), no information has been seen that suggests any progress has been made in 2019. **Spain must further develop the employment of specific monitoring techniques** such as increasing observer coverage, the use of Remote Electronic Monitoring (REM), closed-circuit television (CCTV), drones, and/or forensic sampling of catches on board vessels and ports in order to guarantee the implementation of the landing obligation.
- **Regarding catches below MCRS, it is paramount to increase control to avoid the deliberate increase of these catches as well as, once landed, to identify and verify their destination.** This must be done collaboratively between the General Administration of the State and AA. CC; the latter being competent for marketing control. In addition, reporting and transparency on the control measures undertaken and the use of those catches should be improved, both by AA. CC – which must feed information to the General Administration of the State – and Spain – which must in turn, provide this information to the Commission.
- Significant efforts are needed to **ensure port infrastructure is adapted to a higher volume of landings.** This must be done in collaboration between the State and AA. CC.
- Without a change in the operational approach of fishers and the industry, the proper implementation of the landing obligation will not be possible. It is important for them to understand the benefits resulting from the implementation of the landing obligation. **Accurate reporting is vital to understanding the impact of the landing obligation and the efforts undertaken to comply with it. It is in fishers' best interest to accurately record such catches** in order to continue benefitting from the current level of exemptions and flexibility mechanisms. **Spain should make increased efforts to ensure better reporting of such catches.**
- Spain's efforts to improve selectivity of gear are a positive step to comply with the landing obligation and avoid choke species. However, it should carefully consider and work towards the **introduction of more effective relevant technical and policy measures which could contribute to improving selectivity and reducing unwanted catches.**
- It is paramount to increase **transparency on data concerning the implementation of the landing obligation to ensure its control and improvement.** According to the Commission's annual reports on the landing obligation for 2017 and 2018, generally Spain has provided limited quantitative information regarding control of the landing obligation, making it difficult to assess compliance. In this context, **Spain's failure to comply with the provisions under the Aarhus Convention regarding access to environmental information must also be highlighted. Spanish authorities have to date failed to provide an answer to the request filed by ClientEarth in April 2019** regarding the implementation of the landing obligation in 2017, 2018 and 2019, despite having a one-month deadline to answer, according to the legislation in force.

The above recommendations show that there is a need for significant improvement in the implementation of the landing obligation and its control mechanisms. Contributing to these objectives is an endeavour in which all relevant stakeholders must participate.



Endnotes

- 1 The authors would like to thank Àlex Bartolí and Javier López of Oceana for their contributions in the elaboration of this report.
- 2 Britain, Denmark and Ireland. Lutchman I., C. Grieve, des Clers S., De Santo E., Towards a Reform of the Common Fisheries Policy in 2012 – a CFP Health Check, IEEP, London, 2009, p.12.
- 3 Regulation 2141/70 laying down a common structural policy for the fishing industry (OJ L 236, 27.10.1970) and Regulation 2142/70 about a common organization of the market in fishery products (OJ L 236, 27.10.1970).
- 4 Council Regulation (EEC) No 170/83 of 25 January 1983 establishing a Community system for the consumption and management of fishery resources, (OJ L 24, 27.01.1983).
- 5 Council Regulation (EEC) No 3760/92 of 20 December 1992 establishing a Community system for fisheries and aquaculture, (OJ L 389, 31.12.1992).
- 6 Regulation (EC) No 2371/2002 of December 20, on the conservation and sustainable exploitation of fisheries resources under the Common Fisheries Policy, (OJ L 358, 31.12.2002).
- 7 The legislative packet includes Regulation (EU) 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy (OJ L 354, 28.12.2013); Regulation (EU) 1379/2013 of the European Parliament and of the Council of 11 December 2013 on the common organization of the markets in the fisheries and aquaculture products sector (OJ L 354, 28.12.2013) and Regulation (EU) 508/2014 of the European Parliament and of the Council of 15 May 2014 on the European Maritime and Fisheries Fund (OJ L 149, 25.05.2014). Regulation 1380/2013 and 1379/2013 were later amended by the so-called Omnibus Regulation (Regulation (EU) 2015/812), whose purpose was to align existing technical measures with the requirements of the new discard policy. It also introduced modifications to the landing obligation.
- 8 Art. 15, Regulation 1380/2013 (CFP Regulation).
- 9 European Commission, Communication from the Commission to the European Parliament and the Council on the State of play of the Common Fisheries Policy and Consultation on the Fishing Opportunities for 2020, 7.6.2019, COM (2019) 274 final.
- 10 Recital 26, CFP Regulation.
- 11 Uhlmann S., Ulrich C., Kennelly S., The European Landing Obligation: Reducing Discards in Complex, Multi-Species and Multi-Jurisdictional Fisheries, 2019, Springer Open. Available at: <https://link.springer.com/content/pdf/10.1007%2F978-3-030-03308-8.pdf>
- 12 The highest possible annual catch that can be sustained over time, by keeping the stock at the level producing maximum growth. Source: WWF, Common Fisheries Policy Reform: Getting MSY Right, October 2011.
- 13 Regulation 1380/2013.
- 14 The *de minimis* exemption allows to discard a certain percentage of the total annual catch of species subject to the landing obligation without being counted against the allocated quota when scientific evidence determines that increasing selectivity is very difficult or to avoid the disproportionate costs of managing such unwanted catches.
- 15 Art. 15(4), CFP Regulation, as amended by Art. 9(a) of Regulation (EU) 2015/812.
- 16 Advisory Councils provide the Commission and Member States with recommendations on matters of fisheries management. They are composed of representatives from the industry and other relevant stakeholders.
- 17 The STECF, which was established by the Commission in 1993 is formed by highly qualified scientific personnel and assists the Commission in developing the CFP policy.
- 18 More information available at: <https://stecf.jrc.ec.europa.eu/reports/discards>
- 19 These plans are used as a management tool for fish stocks and fisheries at EU level. Each multiannual plan contains a maximum sustainable yield target and other rules to ensure the sustainable exploitation of fish stocks.
- 20 Magazine Oceano, Cinco meses de la obligación de desembarque, Segundo Trimestre 2019.
- 21 Art. 15(8) and (9), CFP Regulation.
- 22 Article 90 (1), para. c) of Council Regulation (EC) 1224/2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy (OJ L 343, 22.12.2009), amended by Article 7 (14) of Regulation (EU) 2015/812 of the European Parliament and of the Council of 20 May 2015 (OJ L 133, of 29.05.2015).
- 23 Spain is a highly decentralized state. Sovereignty is vested in the nation as a whole. However, the nation has, in variable degrees, devolved power to the communities, which, in turn, exercise their right to selfgovernment within the limits set forth in the Spanish Constitution and their Statutes of Autonomy.
- 24 CEPESCA, Informe del Sector Pesquero Español 2019. Available online at: <http://cepesca.es/wpcontent/uploads/2019/06/INFORME-SECTOR-PESQUERO-ESPAN%CC%83OL-2019.pdf>
- 25 The information contained in this section of the report refers mainly to Spain's implementation of the landing obligation in 2017 and 2018 and has been obtained from the Annual Reports sent by Spain to the Commission on the Landing Obligation as well as from the Evaluation by the Commission of Member States' Annual Reports on the Landing Obligation for those years.
- 26 Order APA/514/2019, (BOE N. 112, 10.05.2019).
- 27 Proyecto de Real Decreto por el que se regula la comercialización de los productos pesqueros sujetos a obligación de desembarque.
- 28 Available online at: https://www.mapa.gob.es/es/pesca/legislacion/tripticonwwfinal_tcm30-500188.pdf
- 29 Available online at: https://www.mapa.gob.es/es/pesca/legislacion/tripticoswwfinal_tcm30-500189.pdf
- 30 Available online at: https://www.mapa.gob.es/es/pesca/legislacion/tripticomediterraneo_final_tcm30-500186.pdf
- 31 The International Council for the Exploration of the Sea (ICES) defines "choke species" as "species with a low quota that can cause a vessel to stop fishing even if they still have quota for other species". The obligation to land all catches may lead to a vessel having to remain in port, if during its activity, it has caught fish for which it did not have quota. This is especially the case in mixed fisheries.
- 32 The obligation to use this specific fishing gear applies in the Northwest Coast of Scotland and North Ireland as well as the Irish Sea, West of Ireland, Porcupine Bank, Eastern and Western English Channel, Bristol Channel, Celtic Sea North and South and Southwest of Ireland – East and West.
- 33 Commission Staff Working Document, Impact Assessment accompanying the document Proposal for a Regulation of the European Parliament and the Council amending 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 controls, (COM(2018) 368 final). In the report sent by Spain to the Commission for the landing obligation in 2017, this problem is also identified.
- 34 Art. 15(11), CFP Regulation.
- 35 Art. 4, MO of April 2019.
- 36 Hoefnagel E., de Vos B., Buisman E., Quota swapping, relative stability and transparency, 2015.
- 37 Uhlmann S., Ulrich C., Kennelly S., The European Landing Obligation: Reducing Discards in Complex, Multi-Species and Multi-Jurisdictional Fisheries, 2019, Springer Open.

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